San Juan Resource Management Plan

PROPOSED RESOURCE MANAGEMENT PLAN
FINAL ENVIRONMENTAL IMPACT STATEMENT
VOLUME 2

September 1987

U.S. Department of the Interior
Bureau of Land Management
San Juan Resource Area, Moab District

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FOR THE PROPOSED SAN JUAN RESOURCE MANAGEMENT PLAN

MOAB DISTRICT

UTAH

VOLUME 2 OF 2 VOLUMES

Comment Letters and Responses

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INTRODUCTION TO VOLUME 2

OVERVIEW

Volume 2 of the San Juan Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) contains copies of the public and agency comments received on the draft and the Bureau of Land Management's (BLM's) responses to those comments. For ease of reference, the commentors are listed in this section.

PUBLIC AND AGENCY COMMENTS RECEIVED

The comments have been grouped into five categories: those submitted by special interest groups, industry, federal agencies (other than the BLM), state and local government agencies, academic agencies, and individuals. The comments are presented in the order listed. Where more than one letter was received from one commentor, they were numbered in the order received.

LIST OF COMMENTORS

Special Interest Groups

1 Earth First!
2 National Parks and Conservation Association
3 National Wildlife Federation
4 The Nature Conservancy
5 Rocky Mountain Oil and Gas Association
6 Sierra Club, Cache Group
7 Sierra Club, Weminuche Group
8 Sierra Club, Utah Chapter
9 Southern Utah Wilderness Alliance
10 Utah Native Plant Society
11 Utah Nature Study Society
12 Utah Professional Archaeological Council
13 Utah Wilderness Association
14 Wasatch Mountain Club

Industry

15 AMOCO Production Company
16 Celsius Energy Company
17 Colorado Outward Bound School
18 Marathon Oil Company
19 National Outdoor Leadership School
20 Permits West, Inc.

Federal Government Agencies

21 Advisory Council On Historic Preservation
22 Environmental Protection Agency, Region VIII

U.S. Department of Agriculture

23 Forest Service, Manti-LaSal NF

U.S. Department of the Interior

24 Bureau of Indian Affairs, Navajo Area Office
25 Bureau of Reclamation, Upper Colorado Regional Office
26 Bureau of Reclamation, Upper Colorado Regional Office
27 Fish and Wildlife Service, Ecological Services
28 National Park Service, Rocky Mountain Regional Office
29 Office of Surface Mining, Reclamation and Enforcement

State and Local Government Agencies

30 State of Utah, Office of the Governor
31 State of Utah, Office of the Governor
32 San Juan County Commission

Academic Agencies

33 Northern Arizona University, Archaeology Laboratory
34 Northern Arizona University, Archaeology Laboratory
35 University of Arizona, Arizona State Museum
36 University of Colorado, Mesa Verde Regional Research Center

Individuals

37 Daryl Anderst
38 Jim Aton
39 F.A. Barnes
40 Elliot Bernshaw
41 Jay Bickford
42 Fred Blackburn
43 James G. Bock
44 David Boles
45 Carol S. Bosserman
46 Susan Bridges
47 Mrs. Gale Burak
48 Richard Campanella
49 Joseph V. Chiareth
50 Kris Cnick
51 Doug Chinn
52 Nina Cnurchman
53 Meredith Cox
54 Kirk Cunningham
55 Theresa M. Donahue
56 Llyn Doremus
57 James Dryer
58 Leo M. Eisel
59 Kevin Emmerich
60 Steve Erickson
61 Harlan Feder
62 Dorothea Fox
63 John Fox
64 Jim Granam
65 Douglas J. Green
66 Rodney Greeno
67 Rodney Greeno
68 Scott Groene
69 Ed Grumbine
70 Michael E. Holweger
71 Erik R. Hvoslef
72 Kathleen Johnson
73 Wayne King
74 Kim Koenig
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102 Scott T. Smith
103 Douglas Stark
104 Jocelyn C. Stoudt
105 John R. Swanson
106 Donald R. Thompson
107 Nicholas Van Pelt
108 John Veranth
109 Marty Walter
110 David W. Willey
111 J. Dennis Willigan
112 Henry G. Wright

PUBLIC COMMENT PERIOD

The San Juan draft RMP/EIS was printed in May 1986 and distributed to the public through a mass mailing. The draft was subject to a 5-month public review and comment period.

The BLM printed a Notice of Availability in the Federal Register on June 6, 1986, which released the draft for a 90-day public review and comment period to end September 5, 1986. This date was also printed in the draft. The EPA printed its Notice of Availability for the draft in the Federal Register on June 20, 1986, which marked the official start of the 90-day public comment

period. Because of the discrepancy in dates, the comment period was automatically extended to September 19, 1986. Based on several requests for an extension of time, the BLM published a Notice of Extension of the comment period in the Federal Register on August 22, 1986, which extended the comment period to November 3, 1986. The total time available to the public to comment on the draft was from June 6 to November 3, or 150 days (5 months).

A public meeting was held in the SJRA office from 2 to 8 p.m. on July 16, 1986 to provide the public with the opportunity to discuss the draft with the RMP staff. The meeting was announced in the June 6 Federal Register notice and in the draft. The meeting was attended by @??@.

REQUESTS FOR EXTENSION OF TIME

During the original 90-day comment period, the BLM received 16 requests to extend the comment period. Of these, 4 were from special interest groups and 12 were from individuals. The reasons cited were the complexity of the document and the overlap with the public comment period on the statewide wilderness draft EIS. Based on these requests, the State Director extended the comment period for an additional 60 days. Of the groups requesting an extension, three later commented on the draft and one did not; of the individuals, five commented on the draft and seven did not.

Letters requesting an extension of time for the public comment period are listed below, but were not printed because they did not comment on the draft.

SPECIAL INTEREST GROUPS

National Parks and Conservation Association
Southern Utah Wilderness Alliance
Utah Wilderness Association
The Wilderness Society

INDIVIDUALS

Fred Blackburn
Valerie P. Conen
Daniel Hoffman
John Magyar
Miki and John Magyar
Ann Phillips
Mike Riley
Janet Ross
John W. Sanders
Owen Severance
Del Smith
Henry G. Wright

COMMENTS RECEIVED AFTER CLOSE OF COMMENT PERIOD

Several comment letters were received after the close of the 150-day public comment period, and were still being received as this proposed RMP and final EIS was prepared. These letters were read by the staff, but are not printed and were not analyzed; BLM did not prepare responses to them. If any late comments pointed out factual errors in the draft, the text was corrected. However, the comment from the Advisory Council on Historic Preservation, received after the close of the public comment period, has been included in the proposed RMP and final EIS because it fulfills the consultaion requirement of Section 106 of the National Historic Preservation Act of 1966 (see 36 CFR 800).

ANALYSIS OF COMMENTS RECEIVED

The following statistical analysis is presented in table A. At the end of the comment period, 143 parties had submitted comments. Letters were submitted by 103 respondents; additionally, one petition was received with 40 signatures (the cover letter was included with the 103 respondents because it has different content and a different signature). Of the 103 respondents, 14 (13 percent) were special interest groups; 6 (6 percent) were industries (4 were energy related and 2 were recreation related); 8 (8 percent) were federal agencies (excluding comments from other offices of the BLM); 2 (2 percent) were local government agencies (the State of Utah and San Juan County); 3 (3 percent) were academic agencies; and 70 (68 percent) were individuals. (An additional comment received from a federal agency after the close of the comment period was included in the proposed RMP and final EIS because it fulfills a regulatory review requirement.)

TABLE A

Breakdown of Commentors by Type, by Region

Locality of Origin	Groups[a]	Industry	Academic	Governments[b]	Individuals	Petition	Total	Percent	Locality of Origin
Salt Lake City, Utah	7	1	0	4	9	0	21	15	Salt Lake City, Utah
Logan, Utah	2	0	0	1	7	0	10	7	Logan, Utah
Southeast Utah	0	0	0	2	9	0	11	8	Southeast Utah
Southwest Utah	1	0	0	0	2	0	3	2	Southwest Utah
Denver, Colorado	1	2	0	3	8	0	14	10	Denver, Colorado
Boulder, Colorado	0	0	0	0	12	0	12	9	Boulder, Colorado
Fort Collins, Colorado	0	0	0	0	5	0	5	3	Fort Collins, Colorado
Southeast Colorado	0	0	0	0	1	0	1	1	Southeast Colorado
Central Colorado	0	0	0	0	5	0	5	3	Central Colorado
Southwest Colorado	1	0	1	0	6	11	19	13	Southwest Colorado
Arizona	1	0	2	0	0	19	22	16	Arizona
New Mexico	0	1	0	0	1	8	10	7	New Mexico
Wyoming	0	2	0	0	0	0	2	1	Wyoming
Midwest	0	0	0	0	3	2	5	3	Midwest
West Coast	0	0	0	0	2	0	2	1	West Coast
Washington, D.C.	1	0	0	0	0	0	1	1	Washington, D.C.
TOTALS	14	6	3	10	70	40	143	100	

[a]Special interest groups.

[b]Federal, state, and local governments.

Based on an analysis of postal zip codes of return addresses provided, the 143 commentors were regionally clustered in the Four-Corners area (southeastern Utah, southwestern Colorado, New Mexico and Arizona), the Wasatch Front (Salt Lake City and Logan areas), and the Colorado Front Range (Denver, Boulder, Fort Collins, and Pueblo). Of the total, 62 (43 percent) were from the Four-Corners area. Additionally, 31 (22 percent) were from the Wasatch Front and 29 (20 percent) were from the Colorado Front Range.

Of the 14 special interest groups, 9 (60 percent) were from the Wasatch Front. All three academic agencies were based in the Four-Corners area. Of the 70 individuals, 25 (36 percent) were from the Colorado Front Range area and an additional 6 (8 percent) were from east-central Colorado. A total of 16 (23 percent) were from each of the Wasatch Front and the Four-Corners area; only 2 individuals resided in the planning area, however. Of the 40 petitioners, 2 were from the Midwest (Illinois) and the remainder from the Four-Corners area.

PRINTED COMMENTS AND RESPONSES

The BLM's response is printed beside each comment page for ease of reference.

The comment responses also indicate where the text of the draft EIS has been changed in response to a comment received. The changes to the text are found in the final EIS portion of volume 1.

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COMMENT 1

Earth First!

BLM,

Earth First! requests that you manage all your lands in as undeveloped a state as possible. In accordance with the Earth First! Utah Wilderness Proposal, which we have submitted to the Utah BLM, we ask you to designate all suitable roadless areas in the San Juan Resource Area as Wilderness. In particular, we urge you to carefully protect the wild quality of BLM lands adjacent to National Park units in southern Utah. We also urge you to strictly protect the pristine qualities of those areas you designate as ACECs and ONAs.

Earth First!
John Davis

P.O. Box 5871 • Tucson, Arizona • 85703 • 602-622-1371

RESPONSE TO COMMENT 1 — EARTH FIRST!

[Comment page 1]

The comment is noted.

Regarding comments on wilderness designation, see the response to comment 13, Utah Wilderness Association, comment page 3.

Regarding protection of lands adjacent to National Park units, see the response to comment 2 from National Parks and Conservation Association.

Change to the FIS? No.

COMMENT 2

November 2, 1986

Ed Scherick, San Juan Resource Area Manager
Bureau of Land Management
PO Box 7
Monticello, Utah 84535

Dear Mr. Scherick,

The National Parks and Conservation Association submits the following comments on the May 1986 draft San Juan Resource Management Plan and Environmental Impact Statement. We appreciate BLM's earlier extension of the public comment period until November 3.

1. BLM has failed to adequately identify planning issues in the San Juan RMP.

NPCA objects to BLM's failure to include cultural resource management and consistency with National Park Service plans and policies as planning issues, and requests that BLM issue a revised draft which adequately addresses these issues as planning issues.

The cultural resources and national park resources located within the San Juan Resource Area are of national significance and the effect of BLM management actions on these resources is of national concern.

Both cultural resource management and consistency with national park plans meet the criteria outlined in the San Juan RMP for identification of planning issues (P.1-1) (presents major land-use conflict which can be reasonably resolved in alternative ways, can be mapped, is timely) and those criteria outlined in BLM's Manual at Section 1616.13.

Furthermore, BLM's planning regulations specifically require that the identification of planning issues must comply with the scoping process required by 40 CFR Sec. 1501.7. (CEQ regulations). And that provision, in turn, expressly incorporates the requirement of 40 CFR Sec. 1508.25 which requires that the EIS consider alternatives involving "other reasonable courses of actions." 40 CFR Sec. 1508.25(b)(2). In light of the admitted extensiveness of cultural resources in the planning area, and the acknowledged severity of damage and loss occurring under all of the proposal management alternatives, BLM's failure to treat cultural resource protection as a primary management issue is unreasonable. Similarly, in light of the close relationship of key BLM lands to the scenic, cultural, wildlife and recreational

National Parks and Conservation Association
1701 Eighteenth Street, N.W., Washington, D.C. 20009
Telephone (202) 265-2717

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 1]

Identification of Planning Issues

Planning issues for this RMP effort were formulated in compliance with the NEPA scoping process at 40 CFR 1501.7, regulations at 43 CFR 1610.4-1, and BLM manual section 1616.1. Concerns raised by the public during the scoping process were evaluated to determine whether they met the criteria for a planning issue (draft page 1-1). Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded (see revisions to draft page 1-6).

Consistency with NPS plans was not identified by any party (including NPS) for consideration as a planning issue during scoping or while the draft was being prepared, although the NPS suggested coordination of management of Glen Canyon NRA (draft page 1-6), as mentioned in the comment. Concerns that did not qualify as planning issues are documented on draft page 1-6.

By definition (BLM manual section 1616.13 D.), a "planning issue" is more limiting than an "issue" under the ambit of 40 CFR 1501.7; in accordance with section (a)(3) of that regulation, the RMP/EIS discusses why certain topics raised by the public (such as cultural resource management or coordination of management within Glen Canyon NRA) were not carried as planning issues.

values of adjacent National Park lands, it is unreasonable for BLM to disregard management consistency as a planning issue.

The BLM Manual specifically notes that "the information provided from public participation activities is a primary source of material from which planning issues are identified and selected." The Manual instructs BLM to consider the "relative significance"--or level and degree of public concern--in determining what will be planning issues. The BLM itself notes in the SJRMP that "management and protection of archeological and historic resources has been identified as a concern by the public, academic institutions, the BLM and other federal, state and local government agencies."

Moreover, the San Juan/San Miguel RMP for the San Juan/San Miguel Resource Area in southwest Colorado--an area with similar cultural resources and cultural resource protection conflicts--recognizes cultural resource management as a planning issue.

The issue of consistency with national park plans and policies has also been raised repeatedly by the National Park Service and by national and state organizations as well. In a March 26, 1985 letter to Ed Sherrick, Area Manager, SJRA, the Superintendent of Glen Canyon NRA (John Lancaster) specifically requested that the BLM identify the BLM's role on NPS lands within the SJRA as an additional issue for planning.

Similarly, NPCA responded to BLM's preplanning analysis with a specific request:

> That BLM revise its identification of the planning issues to include issues addressing the conflicts between mineral development and the scenic, recreational, aesthetic and cultural values of the area, particularly as those conflicts may affect Canyonlands National Park.

Letter dated 2 February 1985 from NPCA attorney William J. Lockhart to Roland Robison and Gene Nodine, BLM.

Furthermore, that letter specifically requested a statement of the basis for your conclusions that the above planning issue, and other similar issues listed on pages 13 and 14 of your preplanning analysis could be eliminated or disregarded on the theory that they are "governed by specific laws" or "otherwise not discretionary with the area manager." No such statement has ever been supplied.

NPCA is also disturbed that the BLM failed to address potential resource allocation decisions related to the testing and siting of a nuclear waste disposal site in Davis or Lavender Canyons. NPCA's letter of February 2, 1985 NPCA requested that

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[Comment page 2]

Coordination with other agencies is required under 43 CFR 1610.3-1. Coordination with the NPS, including consistency review of plans prepared by that agency, is documented in draft chapter 5 (see also the MSA; consistency with plans of other agencies is documented for each management program discussed in part II).

The impacts of testing for, or construction of, a nuclear waste repository were not considered in the draft (page 2-10). BLM has received no specific proposals for these types of projects. To avoid pointless speculation, under NEPA and the CEQ guidelines, a proposal must exist before NEPA documentation can be done (40 CFR 1502.3).

The planning criteria used for development of the RMP state that the RMP/EIS will not consider or provide for the designation of specific parcels of public lands for special withdrawals, private Congressional bills, or Congressional withdrawals. Siting of a nuclear waste repository and related facilities would be such an action. The planning criteria provide for consideration of these types of actions individually upon proper application; an RMP amendment will be prepared if necessary (draft page 1-10).

The planning criteria were finalized in 1985 after a public review period (draft page 5-9). No comments were received which suggested changing the wording of this criterion.

Under the provisions of the Nuclear Waste Policy Act of 1972 (draft appendix C), a Congressional bill would be required for construction of a nuclear waste repository. Site selection for further testing is under the purview of the President and would entail a special withdrawal. If either of these actions occurred, an RMP amendment and accompanying NEPA documentation would be prepared at that time, as stated in the planning criteria. It is premature to address a topic in the RMP/EIS that has not yet been proposed or defined: no site in the SJRA was identified for further testing [DOE, 1986].

Even if a proposal for testing and siting of a nucluear waste repository had been received by BLM prior to preparation of this RMP/EIS, this topic would not qualify as a planning issue (see earlier discussion).

BLM revise its identification of planning issues to include issues affecting the use of public lands for possible development of a nuclear waste repository and the potential conflicts between that development and scenic, recreational, aesthetic and cultural values, particularly those of Canyonlands National Park.

Earlier repeated requests by NPCA to the BLM to address the nuclear waste issue under the FLPMA planning provisions were answered by the Moab District Manager on 14 August 1984 assuring that:

> Moab District BLM will complete a plan amendment in compliance with 43 C.F.R., Part 1600, at the time the Davis and Lavender Canyon sites are nominated as suitable for site characterization.

There is no legal basis for that response. The sites were under active DOE consideration, which has now led to a further crucial step. In DOE's May 1986 Environmental Assessment "nominating" the Davis Canyon site for formal consideration as a repository, DOE finds the Davis and Lavender Canyon site suitable for site characterization.

BLM continues to refuse however to address the nuclear waste siting and testing issues in the SJRMP. BLM incorrectly states that "The BLM has no control over this process." (Meaning the nuclear waste site selection process.) This is not true. The fact is that BLM may be asked to grant a withdrawal of lands for repository development, as well as rights of way and other authorities for roads and testing activities.

2. BLM has failed to adequate provide for consistency between the SJRMP and NPS plans and policies.

The SJRA abuts or surrounds four NPS units--Canyonlands National Park, Glen Canyon National Recreation Area, Natural Bridges National Monument and Hovenweep National Monument. These areas are managed pursuant to the 1916 Organic Act which requires that NPS units be managed so as to "conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

In 1978, Congress amended the Organic Act to reaffirm the high standards of the Act and to clarify that the nonimpairment standard applies to all units of the National Park System.

> Congress declares that the national park system, which began with (the) establishment of Yellowstone National

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[Comment page 3]

Consistency Between BLM and NPS

The NPS Organic Act, as amended, states that NPS is to "promote and regulate the use of the federal areas known as national parks, monuments, and reservations hereinafter specified...[so as to] leave them unimpaired for the enjoyment of future generations" [16 USC 1]. This law does not address the administration of public lands, whether in proximity to an NPS unit or not; it does not require the Secretary to leave public lands unimpaired to preserve park values. To the contrary, Congress provided that public lands are to be managed for multiple use and sustained yield, whether in proximity to an NPS unit or not (draft page 1-9).

Park in 1872, has since grown to include superlative natural, historic and recreation areas in every major region of the United States . . . that it is in the purpose of this Act to include all such areas in the System and to clarify the authorities applicable to the System . . .

The 1978 amendments also reemphasize the Secretary's responsibility to assure than management decisions and actions do not impair park values. Section 1a of the amended Organic Act states:

The authorization of activities shall be construed and the protection, management and adminstration of these areas shall be conducted in light of the high public values and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established.

The Organic Act and its amendments, as well as the specific enabling acts of each park unit, establish the standards under which potential inconsistencies between national park plans and policies and the SJRMP should be evaluated and resolved.

Management actions of SJRA lands clearly have the potential to significantly affect--and possibly impair--national park resources and values. The BLM has failed in the draft SJRMP however to:

> adequately acknowledge the interrelationship between national park service resources and SJRA resources;

> to assess individually or cumulatively potential impacts to national park resources and values from alternative and proposed BLM management practices;

> to identify areas of potential conflict between NPS plans and policies and alternative and proposed BLM management practices;

> to identify actions to resolve these potential conflicts.

These types of analyses and planning actions are clearly essential to meet the requirements of the Organic Act as well as the consistency requirements of FLPMA and BLM planning regulations.

FLPMA and BLM planning regulations are explicit in requiring the BLM to strive for consistency between BLM resource management plans and other approved resource related plans or programs of

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[Comment page 4]

The RMP team identified elements of the human environment that would be affected by the alternatives assessed, and the resulting impacts. Impacts identified as occurring on NPS-administered lands as a result of the RMP alternatives were discussed in the draft (page 4-11, for example). BLM planners are under no obligation to meet the requirements of the NPS Organic Act, just as NPS planners need not meet the requirements of FLPMA.

other federal agencies, and, where inconsistencies are identified, to identify and adopt actions to resolve inconsistencies if at all possible.

FLPMA requires that the Secretary "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 . . . " FLPMA Sec. 202(c)(a), 43 USC Sec. 1712(c)(9)

BLM planning regulations elaborate on this requirement, at 43 CFR Sec.1610.3-2(a):

> Guidance and resource management plans and amendments to the MFP shall be consistent with officially approved or adopted resource related plans and the policies and programs contained therein, of other Federal agencies . . .

Similarly, BLM planning regulations require that guidance provided by the Director and State Director for the preparation of a RMP shall:

> (1) Ensure that it is as consistent as possible with existing officially adopted and approved resource related plans, policies or programs of other federal agencies . . .
>
> (2) Identify areas where the proposed guidance is inconsistent with such policies, plan or programs and provide reasons why the inconsistencies exist and cannot be remedied; and
>
> (3) Notify the other federal agencies . . . with whom consistency is not achieved and indicate any appropriate methods, procedures, actions and/or programs which the State Director believes may lead to resolution of such inconsistencies.

[1610.3-1 (c)(2)]

BLM planning regulations reinforce the BLM's obligation to seek the affirmative resolution of inconsistencies identified by other federal agencies between BLM RMPs and other officially approved resource related plans. The regulations say:

> Should they [other federal agencies] notify the District or Area Manager, in writing, of what they believe to be specific inconsistencies between the BLM resource management plan and their officially approved and adopted resource related plans, the resource

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[Comment page 5]

Under 40 CFR 1502.16 and 43 CFR 1610.3, BLM is required to document whether the proposed RMP would be consistent with the plans of other federal agencies; this was done in chapter 5 of the draft. BLM is not obligated to attempt to resolve inconsistencies with the plans of other agencies if the purposes of public land management (such as multiple use) would be compromised by doing so (43 CFR 1610.3-2).

management plan documentation shall show how those inconsistencies were addressed and, if possible, resolved.

43 CFR Sec. 1610.3-1(e).

Despite these provisions potential inconsistencies identified by the NPS in written comments during the preparation of the draft SJRMP are not addressed or documented in the draft RMP.

NPCA refers BLM to the 9/23/83 letter from the NPS Assistant Regional Director of Planning and Resource Preservation to the SJRA Manager regarding proposed planning issues. In this letter the NPS recommends that the BLM adopt "sensitive resource criteria" similar to that developed in the draft Tar Sand Triangle EIS to avoid conflicts between the protection of park resources and BLM management actions. Sensitive resource criteria recommended include the designation of no surface occupancy for sites/areas eligible for nomination to the national historic register, the prohibition of intrusive structures or activities that can be seen from Canyonlands National Park, no surface occupancy or waste disposal in the surface drainages or the perennial drainages of the Colorado River or its tributaries, no surface occupancy or operational use of overlooks or access to overlooks in Glen Canyon.

NPCA also refers the BLM to the letters of 3/15/85 from NPS Regional Director to Utah BLM State Director, 3/26/85 from Superintendent John Lancaster to SJRA Manager Ed Sherrick, and 8/2/85 from Glen Canyon NRA Superintendent John Lancaster to SJRA Manager Ed Sherrick. In these letters the NPS requests the BLM to:

> recognize the NPS as a cooperating agency throughout the BLM resource management process;

> recognize BLM's role on NPS administered lands and grazing in the NRA as a planning issue;

> coordinate closely with the NPS in developing criteria for "estimation of effects;"

> include a table comparing management objectives of the BLM and the NPS in order to determine potential inconsistencies in management actions and facilitate NPS determination of potential impacts to NPS resources.

These specific requests are neither documented or addressed in the draft SJRMP.

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[Comment page 6]

This comment references "potential inconsistencies" raised by NPS during preparation of the RMP/EIS. BLM and NPS have had many discussions to coordinate mutual agency concerns. Interagency memorandums and staff reports regarding management of public lands near NPS units are on file in the SJRA and MDO. Concerns raised by NPS were addressed in the draft where relevant. Comments submitted by NPS upon review of the draft are printed in volume 2 of the proposed RMP and final EIS (see comment 28 from the National Park Service, Rocky Mountain Regional Office and the response).

BLM properly identified some key problem areas in its "criteria for problem identification," specifically:

> existing resource management practices conflict with management plans, policies and guidance of another federal surface management agency; (SJRMP at P.1-9)

> documented public controversy regarding management of a specific resource value indicates a management concern. (SJRMP at P.1-9)

However, BLM gave no meaningful application to those problem criteria, and fails to identify potential conflicts with NPS plans and policies in the draft SJRMP.

Similarly, BLM again properly includes some key concerns under "criteria for estimation of effects" of each alternative:

> the impact of management actions upon adjacent federal, private or Indian lands; (SJRMP at P.1-10) and

> the formal land use plans of state and local governments and other federal agencies. (SJRMP at P.1-10)

Again however, BLM provided no meaningful analysis of the potential effects on park resources, or of the consistency of proposed management actions with NPS plans or policies. Consistency with NPS plans is only addressed in Chapter 5 where it is addressed in such a vague and summary fashion that it is impossible to determine if BLM's preferred alternative--or any other alternative--is truly consistent or inconsistent with NPS plans and policies. No analysis addresses potential inconsistencies; and no attempt is made to analyze how inconsistencies might be resolved.

For example, Chapter 5 under "Canyonlands" notes that "management of adjacent public lands would vary by RMP/EIS alternative and may or may not be consistent with NPS ORV designations." (SJRMP at P.5-5)

Similarly, under "Glen Canyon," the draft SJRMP notes with respect to ORV use, utility lines and mineral uses, that "management of public lands would vary by RMP/EIS alternative and may or may not be consistent with NPS management. (SJRMP at P.5-6)

No further explanation is provided.

Elsewhere in Chapter 5, inconsistencies between NPS plans and policies are indicated. For example, BLM's statement for Canyonlands and Glen Canyon that alternatives geared to maintaining P or SPNM ROS classes would be consistent with NPS

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[Comment page 7]

The planning criteria went through a formal public participation process (draft page 5-9) and incorporate the concerns raised by interested parties, including NPS. Consistency with plans of other agencies and past public controversy are documented for each management program discussed in part II of the MSA. Significant conflicts were carried forward into the draft (page 1-6; chapters 3 and 5). Impacts upon adjacent federal, private, or Indian lands, if identified, were noted in the draft (page 4-11, for example).

management is unsubstantiated and in NPCA's analysis, very likely untrue.

First, the special conditions for managing ROS classes for BLM's preferred alternative E (appendix A) only call for maintaining "most" P class areas and "most" SPNM class areas "where possible." No explanation is provided of what the terms "most" and "where possible" mean in terms of on-the-ground management. This wording could clearly allow for inconsistencies between plans.

Second, maintenance of P and SPNM ROS class areas is not necessarily sufficient to provide consistency with national park service plans. It appears that the drilling of an oil and gas well for example could still occur within designated ROS class P areas (as long as the land was reclaimed to its earlier visual appearance). The drilling of an oil and gas well in close proximity to Canyonlands could impair park values through noise and visual intrusion. Furthermore, the SJRMP offers no analysis of the impacts of development of producing wells if oil or gas should be discovered by exploratory drilling. Finally, vast areas of land adjacent to Canyonlands National Park for example--and integral to the park's protection--are categorized as SPM on Figure 3-16 which allows for actions which could conflict with protection of park resources.

BLM's conclusion that no RMP/EIS alternatives would be inconsistent with the management of Glen Canyon NRA development and cultural zones because the development and cultural zones identified in NRA plans are small is also unsubstantiated and probably untrue. The significance of cultural resources within a cultural zone or their vulnerability to impacts from activities on adjacent lands is not necessarily affected by size.

BLM's conclusion that any of the alternatives in the SJRMP/EIS would be consistent with the NPS proposed plan for Natural Bridges National Monument also fails to address important actual or potential conflicts.

Natural Bridges National Monument was established to protect three outstanding natural bridges in the White Canyon system and the exceptional archeological sites within the canyon system and on the mesa tops. The NPS Statement of Management for Natural Bridges recommends that most lands within the Monument be designated as a national archeological district.

The NPS has noted that the cultural sites located outside the Monument are scientifically related to sites within the Monument and that their protection is important to the understanding of sites within the Monument.

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[Comment page 8]

The draft states (pages A-24 and A-25) that all P and SPNM areas are to be managed under the special conditions listed, except the areas at Cross and Squaw Canyons (draft figure 3-16). "Where possible" is defined as "to the extent possible without curtailing valid rights" (draft page A-25).

BLM believes that alternatives C and E, which would maintain the P and SPNM ROS class areas adjacent to NPS units, would be consistent with NPS management of the values within NPS units.

Under alternatives C and E, oil and gas wells could not be drilled, nor could production facilities be constructed, in P class areas, which would be leased with no-surface-occupancy stipulations (draft figures S-2 and S-4). Areas in SPM class would be managed much as they are now (alternative A); there would be no measurable impact (change), either beneficial or adverse, to park values.

The only cultural resource zone in Glen Canyon NRA that abuts public land in SJRA is the corridor along the Hole-in-the-Rock Trail (draft page 5-6). This is a National Register site, and management would be virtually identical on both sides of the park boundary. Development zones in Glen Canyon NRA that abut public land in SJRA are the highway rights-of-way along U-95 and U-263 (now U-276) (draft pages 5 and 6); again, management would be virtually identical on adjacent public land. The text of the draft has been clarified to reflect this (see revisions to draft page 5-6).

BLM is not required to bring the RMP into consistency with a proposed plan prepared by another agency (such as the proposed plan for Natural Bridges NM). BLM would manage significant cultural resource sites on public lands as stated in the draft (page 2-6 and table 2-7) regardless of their proximity to NPS units. Neither BLM nor NPS has authority to designate lands as a national archaeologic district.

Figures 2.12-15 show that all alternatives include potential land treatments in the vicinity of Natural Bridges National Monument which would presumably involve chaining or other manipulations recognized by the SJRMP itself as damaging to cultural resources. These proposed land treatments could also affect scenic values of the Monument.

The BLM granted the NPS the right of way along the approach road (U-275) to preserve the scenic values of the area in the approach to the Monument. Land treatments proposed along U-275 could degrade those scenic values.

Finally, Chapter 5 illustrates BLM's failure to provide consistency with NPS plans and policies for Hovenweep National Monument. While alternative D does include a proposed ACEC designation of lands within a NPCA-proposed "protection zone" around Hovenweep, this ACEC proposal is not recommended under BLM's preferred alternative E. Rather, alternative E includes a proposed potential land treatment next to Hovenweep which has a high potential to disturb the cultural resources and historic scene that NPS planning seeks to protect.

BLM's failure to provide consistency with NPS plans and policies, and to provide the analysis necessary to assess potential inconsistencies must be corrected in the final SJRMP. To provide a meaningful analysis of the consistencies between the SJRMP and NPS plans and policies, consistency must be addressed under all relevant parts of the plan, including:

> Planning issues, Chapter 1;

> Management Guidance Common to All Alternatives and Objectives for Project Management, Chapter 2;

> Affected Environment, Chapter 3;

> Environmental Consequences, Chapter 4.

The interrelationship between NPS and BLM resources should be specifically identified and analyzed under Chapter 3; and the potential affect of proposed BLM activities on NPS resources should be identified and analyzed in Chapter 4.

The SJRMP should also include more detailed information concerning the NPS mandate and policies, including a summary of the ORganic Act and its amendments, specific park enabling acts, and NPS management plans for the Parks.

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[Comment page 9]

As the comment notes, all EIS alternatives (except D) consider potential land treatments in the vicinity of Natural Bridges NM. Congress did not direct that public lands be left unimpaired to preserve park values. BLM would not initiate any actions in the 400-foot-wide Natural Bridges NM access corridor, which is managed by NPS. Localized adverse impacts to cultural or visual resources on public lands would be mitigated as indicated in the draft (pages 2-6 and 2-7, appendixes A and G).

BLM has worked closely with NPS for several years regarding management of lands adjacent to Hovenweep NM. As a result of this coordination, the proposed RMP includes the lands adjacent to Hovenweep as a proposed ACEC (see the revisions to the draft summary, chapters 2, 3, 4, and 5, and appendixes A, H and I).

BLM is confident that NPS resources, management, mandates and policies are adequately covered in the draft RMP/EIS.

3. Other specific illustrations of failure to address inconsistencies between BLM planning and NPS resources and values.

Specific examples of BLM's failure to identify potential inconsistencies between NPS plans and policies and the SJRMP include:

Thresholds of Significance for Environmental Impacts

The draft SJRMP criteria for "estimation of effects" (P.1-10) includes "impact of management actions upon adjacent federal, private or Indian lands" and "formal land use plans of state and local governments and other federal agencies." Nevertheless, the "thresholds of significance for environmental impacts" (Table 4-1) fails to address impacts to park resources as a threshold of significance.

Cultural Resources

Archeological investigations indicate that cultural resources located on SJRA lands are integrally related to understanding and interpreting those cultural resources located within Canyonlands, Hovenweep, Natural Bridges and Glen Canyon. (See NPS comments on the draft SJRMP)

There are designated archeological districts in Canyonlands National Park and Hovenweep National Monument and areas within Natural Bridges and Glen Canyon have been nominated or found eligible for national register district designation. The draft SJRMP fails however to recognize or analyze the interrelationship between NPS cultural resources and SJRA cultural resources.

Furthermore, the draft SJRMP fails to recognize or address the special protection of the rich cultural values adjacent to Hovenweep National Monument provided by BLM's San Juan/San Miguel Resource Management Plan and EIS (Final, December 1984). That plan designates an "Anasazi Culture Multiple Use ACEC," which recognizes the need for protection of the rich cultural values adjacent to Hovenweep. Consistency requirements should mandate that comparable lands and resources in the SJRA receive designation and protection as ACECs. Yet the SJRMP does not address that need, or offer any explanation for this apparent disregard of consistency requirements.

Visual Resource Management

Visitor enjoyment of the scenic resources of Canyonlands, Natural Bridges and Glen Canyon and of the historic scene at Hovenweep is integrally linked to the protection of visual resources in the SJRA. The legislative history of Canyonlands

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[Comment page 10]

Specific Inconsistencies Between BLM and NPS

Thresholds of Significance. As stated on draft page 4-2, table 4-1 indicates thresholds of change believed to be significant to specific environmental indicators (see also draft page 3-1). Indicators regarding allocation of a specific resource, such as mineral leases, are tied to the SJRA because BLM does not allocate resources on other lands (such as NPS units). Indicators regarding dispersed resource values, such as water quality or visual resources, are not tied to the SJRA and would be used to measure significant impacts whether occurring on public lands or not.

Cultural Resources. BLM recognizes the need to protect cultural resources. The policy and procedures for managing cultural resources are discussed on draft page 2-6 (see also tables 2-2 and 2-6, as revised). BLM manages cultural resource sites on public lands regardless of their proximity to NPS units.

The RMP team was aware of the management stipulations imposed in southwestern Colorado by the San Juan/San Miguel RMP (draft page 5-7). Special designations alone do not guarantee a particular level of management. A comparison of the base data and the management actions allowed under the San Juan/San Miguel RMP with the preferred alternative of the draft does not necessarily show that southwestern Colorado has either a richer cultural resource or more stringent management prescriptions for cultural resources. However, as noted above, the proposed RMP includes a proposed ACEC in the vicinity of Hovenweep NM.

Visual Resource Management. Localized adverse impacts to visual resources on public lands would be mitigated as indicated in the draft (page 2-7 and appendixes A and G). However, BLM has reassessed the scenic resources on public lands adjacent to NPS units, and has proposed additional ACECs to protect scenic values in the proposed plan (see revisions to the draft summary, chapters 2, 3, 4, and appendixes A, H and I). These are discussed below.

National Park, for example, specifically recognized this relationship. (See NPCA scenic ACEC nomination for areas adjacent to Canyonlands.)

The draft SJRMP however fails to discuss this interrelationship or to identify potential conflicts between proposed management actions (e.g., land treatments, ORV use, oil and gas development) and visitor enjoyment of park scenic or historic scene resources.

Land Treatments

All alternatives show potential land treatments in the vicinity of Natural Bridges National Monument and alternatives B, C & E show potential land treatments adjacent to Hovenweep National Monument. (The land treatment next to Hovenweep is in the "protection zone" identified by the NPS in Hovenweep planning documents.)

Land treatments in park "viewshed" areas could affect visitor enjoyment of the parks. Land treatments could also harm cultural resources on BLM lands that are important to the understanding and interpretation of cultural resources within the parks.

The draft SJRMP however provides no analysis of how the proposed land treatments could affect park resources and fails to address the potential inconsistency between Hovenweep planning documents and the proposed land treatment in the proposed protection zone, including related cultural resources.

ORV Use

While BLM's preferred alternative E closes an area adjacent to Hovenweep to ORV use, it appears to leave other areas adjacent to national park units open to ORV use. (Meaningful public comment on the draft SJRMP is seriously handicapped by a lack of a map of proposed ORV use areas.) No analysis is provided however of how allowing ORV use in these areas may affect park resources. Potential impacts that are not mentioned or analyzed include noise and visual intrusion, and ORV trespass into Park areas. (Park boundaries are not always fenced or even consistently marked.) Chapter 5 simply notes that ORV categories proposed in the draft SJRMP "may or may not be consistent" with park plans, thus abandoning any attempt to address consistency requirements.

Oil and Gas Development

It is difficult to assess the potential effects of oil and gas exploration and development because the oil and gas

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[Comment page 11]

Land Treatments. Localized adverse impacts to cultural or visual resources on public lands due to land treatments would be mitigated as indicated in the draft (pages 2-6 and 2-7, appendixes A and G). The proposed RMP includes the lands adjacent to Hovenweep NM as a proposed ACEC; land treatments would be allowed only where cultural resources would not be adversely affected (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I).

ORV Use. ORV designations under the preferred alternative were based largely on existing ROS classes. ROS classes were established throughout SJRA under the ROS criteria (draft figure 3-16, table 3-10, and appendix F); proximity of lands to NPS units is not a criterion. As noted above, environmental indicators were analyzed in the draft where an impact was projected to occur, including impacts on NPS lands. The NPS did not identify "ORV trespass" onto NPS units as a concern during preparation of the draft EIS. Alternative ORV use designations are listed in draft table 2-8 and can be derived from table S-1 and figures S-1 through S-4.

Planning regulations require BLM to determine whether the final RMP is consistent with plans of other agencies; the draft extended this to the alternatives. The intent of draft chapter 5 was not to examine the management prescriptions under each alternative for consistency with all other agencies, but rather to identify major inconsistencies, if any, to aid in the decisionmaking process. Some actions, such as ORV designations, vary considerably under the different alternatives, and the draft did not attempt to consider all possible permutations. No major inconsistencies were projected under any alternative.

categories for each alternative are not mapped. Maps should be provided. Furthermore, no analysis is offered that would explain the consequences to Park resources and experience that would result from the various management prescriptions. In particular, BLM fails to explain what constraints on impacting activities will or can be imposed under the specific leasing and operating stipulations applicable to each oil and gas category or management prescription. Nor does it analyze whether those constraints are adequate to assure consistency with protection of Park resources, visitor experience and management plans.

Figure 3-1 shows, Category 1 (Open with Standard Stipulations) areas adjacent to Canyonlands National Park, Natural Bridges and Glen Canyon. Yet the draft SJRMP provides no analysis of how oil and gas exploration and development in those areas could affect national park resources. Potential impacts that are not mentioned or analyzed include noise and visual intrusions as well as damage to cultural resources important to the understanding of NPS cultural resources. The draft SJRMP also fails to identify actions to resolve the potential inconsistency between park protection and oil and gas development on adjacent sensitive lands.

Riparian Areas

The SJRA includes numerous stream channels, including those with sensitive soils, which drain into national park areas. No analysis is provided however about how BLM management of these channels could affect national park resources downstream.

Grazing

According to the Glen Canyon NRA conflicts between livestock use and recreation currently exist in some NRA areas, and there is potential in other areas, especially those near NPS "development zones."

The draft SJRMP fails to recognize or analyze existing or potential recreation-livestock use conflicts. Neither does the plan identify actions which could help resolve these conflicts.

Air Quality

The draft SJRMP completely fails to address the air quality and visibility impacts on scenic areas adjacent to the Parks that may result from location of emitting resources on BLM lands. Yet siting of such resources on BLM lands within park viewsheds, or in locations where emissions may affect Park viewsheds, could significantly affect park resources and values.

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[Comment page 12]

Oil and Gas Development. Current oil and gas leasing categories, used for alternative A, are mapped in figure 3-1 (see also draft page 3-1). Oil and gas category restrictions for all other alternatives would be as shown on the generalized land-use maps, draft figures S-1 through S-4. Constraints on oil and gas exploration and development activities are discussed in appendix A of the draft.

The draft assesses the impacts of maintaining the existing categories in chapter 4 under alternative A; impacts to affected resource values on NPS units were discussed where identified (draft page 4-11, for example).

This draft discusses only components of the environment that would be significantly affected; environmental components that would not be affected (such as noise levels) were not discussed (draft page 3-1). Impacts to visual or cultural resources resulting from oil and gas operations were discussed in chapter 4 if predicted to occur.

Riparian Areas. The analysis of impacts to surface water quality in chapter 4 includes the effects on water quality downstream from SJRA, including NPS units (pages 4-12, 4-19, and 4-20, for example). The impacts to riparian/aquatic habitats in SJRA are discussed only for public lands because the management actions proposed would occur only on public lands (for example, draft pages 3-49 and 4-15).

Grazing. BLM is not aware of any existing conflicts between livestock grazing and recreational use in Glen Canyon NRA; BLM is aware of conflicts between grazing management and NPS management of Glen Canyon NRA (draft page 5-8 and MSA page 4322-36). Adjustments to grazing because of future conflicts with recreation in Glen Canyon NRA could be made within the authority of BLM-NPS agreements on grazing within the NRA (draft pages 3-53 and 5-6).

Air Quality. Impacts to air quality within NPS units were discussed in the draft (pages 3-28, 4-10, and 4-11, for example).

The significance of visibility and scenic values for Canyonlands National Park has been explicitly determined by the Secretary of Interior. Pursuant to 42 USC Sec. 7491, the Secretary has determined that Canyonlands is among the federal Class I areas "where visibility is an important value." 40 CFR Sec. 81.400 and 81.430.

The management obligation to protect that visibility value is heightened by the visibility provisions of the Utah Clean Air Implementation Plan, which imposes specific responsibility on federal land managers to make determinations about the impacts on visibility that may result from any proposals for facilities that may become new sources of air pollution emissions. Furthermore, the Secretary's identification of Canyonlands as a Class I area where visibility is an important value imposes clear responsibility on BLM, as an adjacent federal land manager, to assure that its management plans and prescriptions include provisions for protection against visibility impairment that might result from facilities locate on BLM lands.

The draft SJRMP does not address this significant management problem.

4. Request for adequate consistency planning.

NPCA requests that the final SJRMP/EIS fully comply with the provisions for consistency in FLPMA and applicable planning regulations.

NPCA also specifically requests that the State Director issue guidance as authorized under CFR 1610.1 to the District and Area Managers on how to adequately fulfill consistency requirements in BLM planning, including specific guidance on the need to address the inadequacies discussed above. These inadequacies strongly suggest the need to invoke the specific provision of 43 CFR Sec. 1610.1(a)(3) which requires that:

> such guidance shall be reconsidered by the State Director at any time during the planning process that the State Director level guidance is found, through public involvement or other means, to be inappropriate when applied to a specific area being planned.

We recommend that this guidance require the RMP:

> identify any interrelationship between NPS and SJRA resources, including but not limited to scenic, scientific, cultural, natural and historic resources;

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 13]

Request for Adequate Consistency Planning

BLM is confident that the draft RMP/EIS complies fully with the requirements of FLPMA and the regulations at 43 CFR 1600.

Although the State Director has not issued a document designated as "formal written guidance" under the ambit of 43 CFR 1610.1, he has provided guidance to the RMP team throughout the planning process, and the RMP team has followed that guidance.

> identify consistency with national park plans and policies as a planning issue;

> provide a summary description of NPS plans and policies which provide management direction for the pertinent NPS units. Identify the NPS Organic Act nonimpairment and nonderogaton standards, 16 USC Sec. 1 and 1a-1, as the standards applicable to assessing and resolving potential impacts and inconsistencies.

> assess individually and cumulatively the potential impacts to national park resources from BLM proposed alternatives;

> specifically identify or require specific identification of potential conflicts;

> identify alternative actions or measures the BLM will take to resolve inconsistencies;

> provide reasons why inconsistencies are not resolved in the instances where they are not.

NPCA's request is consistent with the renewed emphasis recently placed on cooperation between federal agencies for land use planning by the Director of the NPS and the Chief of the US FOrest Service. This renewed emphasis is illustrated in the December 16, 1985 memo on NPS and USFS Land and Resource Planning Cooperation and Coordination. The memo notes:

> Building on past successes, and recognizing new opportunities, reenergized interagency coordination can be attained through collaborations in preparing planning policies and procedures, scheduling planning activities, sharing Forest and Park plans for review and comment, conducting joint public involvement activities where appropriate, participating in joint activity reviews and training sessions, and a host of other collaborative enterprises, including conflict anticipation, avoidance and resolution on a continuing basis.

It is NPCA's understanding that the NPS Director and BLM Director have expressed interest in developing similar guidance to NPS and BLM staff.

5. BLM fails to give priority to the designation and protection of Areas of Critical Environmental Concern.

FLPMA requires that BLM:

give priority to the designation and protection of areas of critical environmental concern (ACECs).

[Section 202 (c)(3)]

ACECs are defined as:

areas within the public lands, where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage t important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards."

[FLPMA, Section 103(a)]

These provisions--as well as BLM planning regulations, 1611.7-2 and the BLM Manual--obligate BLM to thoroughly inventory its resources to determine if there are areas which meet the ACEC criteria (relevance and importance).Furthermore, once that determination is affirmatively made for an area, BLM is obligated to consider it as a potential ACEC throughout the planning process.

NPCA understands these provisions to require BLM to consider all potential ACECs (that is, all areas meeting the relevance and importance criteria) in all alternatives, including the preferred alternative. The determination that an area has "relevance and importance" and hence meets the criteria for a potential ACEC is made in the inventory stage and should be not affected by the development of alternatives. (The only possible exception might arise where no special management attention is required because an alternative contemplates that the area will not be "developed or used" at all.)

As the BLM Manual notes, the purpose of the formulation of alternatives is to portray a mix of multiple uses and management actions which could resolve the planning issues and address management concerns. It is not to reassess resource and value determinations made in the inventory process. Hence, while it is appropriate for different management prescriptions to be considered for each potential ACEC under the plan alternatives, each potential ACEC identified during the inventory process should be considered n all plan alternatives, including the preferred alternative, because it has been determined that the area meets the criteria of an ACEC under FLPMA.

[Comment page 15]

Designation and Protection of ACECs

BLM is aware of the FLPMA requirement to give priority to the designation and protection of ACECs. Guidance for identifying and designating ACECs is given in BLM manual section 1617.8 (dated 4/6/84). BLM considered the potential for designation of ACECs under every management program analyzed in part II of the MSA (see the MSA and manual section 1617.82 A.3.).

BLM does not agree that every area considered as a preliminary potential ACEC must be carried through the entire planning process. The MSA documents the findings of the RMP team. The BLM manual provides that the District Manager determines which of the areas discussed in the MSA should be classified as a potential ACEC in the draft RMP/EIS (manual section 1617.82 A.3.b.). The manual requires potential ACECs to be considered in at least one EIS alternative, not all alternatives (including the preferred alternative) as suggested in this comment (manual section 1617.82 B.1.). The manual does not require that all potential areas be designated as ACECs (manual section 1617.83).

On the basis of public comments received on the draft, including information provided by this commentor (discussed below), BLM has revised the proposed ACECs presented in the proposed RMP (see revisions to the summary, chapters 2, 3, and 4, and appendixes A, H and I).

Furthermore, once an area is recognized as meeting the ACEC criteria and is identified as a potential ACEC, it must be designated. Again, the basic identification of an area's relevance and importance in the inventory stage is not affected by the alternative formulation and the selection of a preferred alternative. Rather, the planning process should properly determine the management prescriptions appropriate to accomplish the protection of the ACEC special resources from "irreparable harm."

NPCA believes that BLM has improperly implemented the ACEC requirements of FLPMA and its implementing regulations by failing to consider areas determined to have relevant and important values as potential ACECs throughout all the draft SJRMP alternatives, including the preferred alternative. NPCA further believes that the BLM has violated the ACEC provisions of FLPMA and CFR by failing to designate and provide protection for areas identified as having important resources. In addition, NPCA believes BLM has failed to identify all important resources for potential ACEC designation.

NPCA requests that BLM issue a revised draft plan which properly considers potential ACECs throughout the planning process. This would require identification of potential ACECs under all alternatives, with management prescriptions adequately "protect and prevent irreparable damage" to the important resources identified in the ACEC inventory. While management prescriptions may differ from one alternative to the next to reflect the threats arising from different management emphasis, all management prescriptions must meet the FLPMA requirement of protecting important ACEC resources and preventing irreparable harm to those resources.

NPCA further requests that the State Director issue guidance that BLM's determination of importance and relevance give proper weight to adjacent federal land designations, especially national parks and wilderness. NPCA recommends that the resources of an area be considered relevant and important if they are integral to the protection or enjoyment of the resources and values of a national park or monument, or a wilderness area.

NOMINATIONS

NPCA submits the following ACEC nominations consistent with the requirements of BLM Manual 1617.8(B). These nominations are based on the values described below, most of which are acknowledged or inventoried by the SJRMP or the related MSA. Many of the nominations duplicate or overlap areas recommended at ACECs in one or more of the planning alternatives proposed by the SJRMP, and are thereby required to be considered throughout the planning process. (See above analysis.) Should the BLM not concur with these recommendations, we request a written explanation detailing BLM's reasons for not identifying the potential areas as ACECs and/or for failing to designate the following areas as ACECs.

Canyonlands scenic and natural ACEC

NPCA nominates those areas visible to visitors in Canyonlands National Park within the basin to the east and south of Canyonlands National Park as an ACEC to protect important scenic and natural resources. (See attached map.) Further analysis and mapping is necessary to specifically determine the boundaries of this ACEC. The boundary should be based on the visibility of the area from important backcountry viewing locations and developed frontcountry viewpoints in all districts of Canyonlands National Park.

The importance of this area is established not only by its own outstanding scenic qualities, but also by its interrelationship to the scenic resources of Canyonlands National Park. Canyonlands National Park was set aside to preserve "superlative, scenic, scientific and archeological features for the inspiration, benefit and use of the public." 78 Stat. 934. The legislative history of Canyonlands recognized features both within and outside the National Park as essential to the park's integrity and visitor experience. House Report No. 1823, 88th Congress, 2nd Session says:

> the total assemblage of features and their visual aspect is unique. Nowhere else is there a comparable opportunity to view a colorful, exciting, geologically significant wilderness from above, and then get down into its midst--and still not lose the atmosphere of remote wilderness . . . Scenery alone makes this physiographic unit of national significance and warrant the establishment of a national park within it . . . Archeological, historical, and biological values buttress the significance.

Similarly, Senate Report No. 381, 88th Congress, 1st Session, referred to Canyonlands as a "vast areas of scenic

[Comment page 17]

ACEC Nominations. BLM has considered all areas listed in the comment as ACEC nominations and analyzed them against manual requirements to see if they qualify for further consideration. The final EIS documents the disposition of each nomination (see revisions to draft appendix H for a complete rationale for each nomination).

Canyonlands Scenic and Natural ACEC. Not all of the area nominated in this comment has been considered as a proposed ACEC, but several portions of the large area nominated have been considered as potential ACECs.

Within the area nominated, the draft has been revised to consider the Beef Basin area as a potential ACEC for natural, cultural, and scenic values under alternative D. (Commentor here mentions only scenic and natural values; the Beef Basin area was considered for ACEC potential largely because of cultural resources. See response below concerning cultural values.) The lower Indian Creek canyon and the Butler Wash area are considered as potential ACECs for scenic values under alternative E. (See revisions to the summary, chapters 2, 3, and 4, and appendixes A, H and I of the draft.)

Under guidance in BLM manual 8410, Visual Resource Inventory, an area must be (1) scenic quality A and (2) unique or very rare within its physiographic province in order to be identified as a candidate potential ACEC for scenic values. As the comment notes, in the draft the Lockhart Basin area was the only part of commentor's nomination found to meet these two criteria; it was considered as a potential ACEC under alternatives C and D.

Upon review, BLM re-evaluated the scenic values within the area nominated by commentor. Within the Lockhart Basin potential ACEC, BLM has included the lower Indian Creek canyon in the proposed RMP as a proposed ACEC for scenic values. The area around Butler Wash has been revised to scenic quality A and therefore now meets the manual criteria for a potential ACEC based on scenic qualities; it is included in the proposed RMP as a proposed ACEC.

No other part of the area nominated in this comment was found to meet the manual requirements for consideration as an ACEC for scenic values.

The comment mentions natural values within the nominated area, but does not identify them or provide a rationale concerning them. The comment recommends designation of the nominated area as an ONA on the basis of natural and recreational values; BLM has dropped this designation in favor of the ACEC designation. An ACEC cannot be designated on the basis of recreational values alone (43 CFR 1610.7-2(a)(1)).

wonders and recreational opportunities unduplicated elsewhere in the American Continent or in the world." Both the Senate and *House Reports* specifically mentioned areas outside the proposed park boundary, and within NPCA's proposed ACEC, notably the Six Shooter Peaks, as features which Congress expected to be "landmarks for centuries to come."

The Canyonlands basin is also important because regional and national tourist view this area, both from Canyonlands National Park, the park entrance road, and BLM's Needles and Canyonlands Overlooks. Most visitors perceive this area as within the national park.

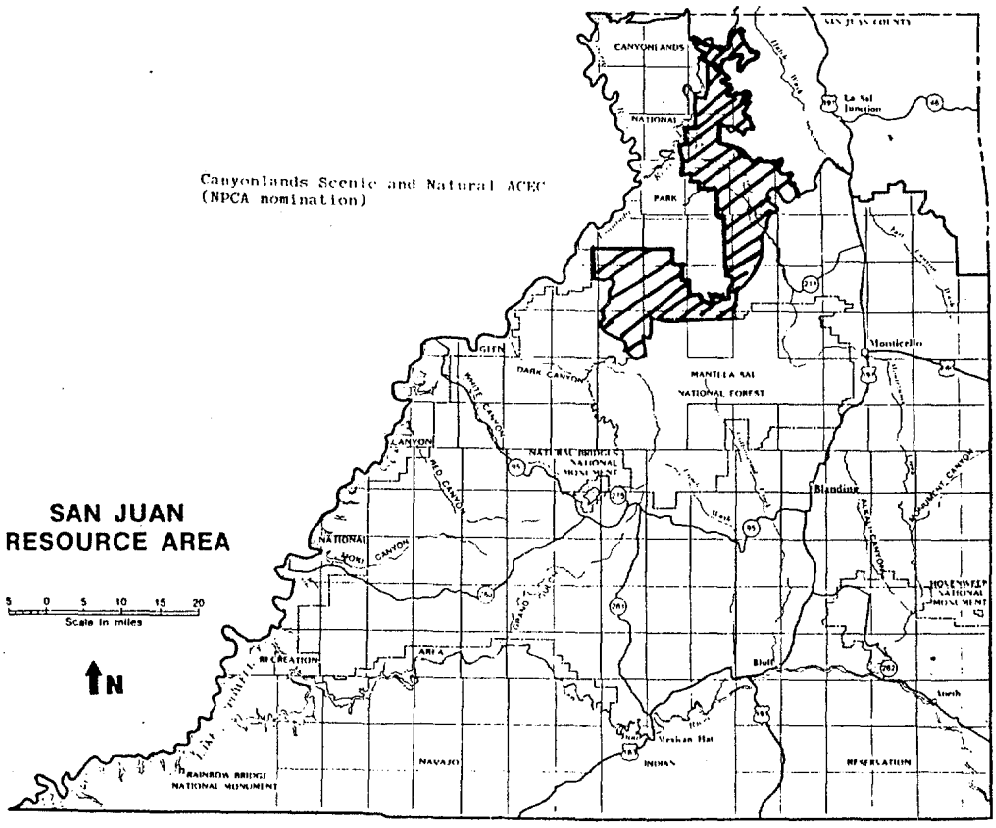
The national significance of this area is further evidenced in the outpouring of objections from across the nation to the consideration of this area for the siting, or even testing, of a nuclear waste repository. Many objections were based on the area's outstanding scenic qualities.

The significance of the scenic and visibility values of the area is also emphasized by the Secretary of Interior's specific designation of the Park as an area where visibility is an important value. 40 CFR Sec. 81.400 and 81.430. (See discussion of "Air Quality,' supra.)

BLM has recognized at least a portion of this area (Lockhart Basin) as important because it has been inventoried under the VRM system and found to be scenic quality A and unique or very rare within its physiographic province. (See Lockhart Basin ACEC description, draft SJRMP A-67)

Relevance exists because special management is needed to protect scenic values. The area is used for grazing and recreation and has been used for exploring oil and gas and hardrock mining in the past. Portions of it are identified as having high development value for uranium and oil and gas.

NPCA also recommends this area for ONA designation because of its outstanding natural features and high recreation values and use.


Canyonlands Scenic and Natural ACEC
(NPCA nomination)
SAN JUAN
RESOURCE AREA
Scale in miles
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CANYONLANDS
NATIONAL
PARK
La Sal Junction
Monticello
MANTILLA SAL
NATIONAL FOREST
DARK CANYON
WHITE CANYON
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Blanding
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HOVENWEEP
NATIONAL
MONUMENT
RECREATION
AREA
Bluff
Mexican Hat
NAVAJO
INDIAN
RESERVATION
RAINBOW BRIDGE
NATIONAL MONUMENT

Canyonlands Cultural Resources ACEC

NPCA nominates lands east and south of Canyonlands National Park for ACEC designation to protect important cultural resources. Further analysis is necessary to specifically determine the boundaries of this unit but it clearly should include the concentration of archeological sites in Indian Creek, Davis and Lavender Canyons, and the Beef Basin-Dark Canyon complex. Further analysis should include an inventory to identify the significance of cultural resources, especially as they may relate to the understanding and interpretation of cultural resources within Canyonlands National Park.

The North Abajo section of this area includes unique and sensitive rock art sites, at least one archeoastronomy site and represents a transition zone between the Anasazi culture to the south and the Fremont culture from the North.

The Fable Valley section of this area is important because of the wealth of undisturbed Pueblo habitation sites which, according to the Management Situation Analysis (MSA) make the area of national significance. As discussed above, the significance of those resources requires their recognition as an ACEC through all planning alternatives.

The Beef Basin section of this area is important because of the unique and accessible towers in Ruin Park. Furthermore, Beef Basin and Fable Valley are recommended for nomination to the National Register in the draft SJRMP under alternative C in recognition of their national significance.

Cultural resources in the entire area are important because the NPS believes that the protection of these areas is critical to protecting and understanding cultural resources within Canyonlands National Park. Recent archeological investigations indicate that the Beef Basin cultural resources are integrally related to the Salt Creek Archeological District cultural resources. A similar interrelationship is believe to exist between archeological resources in the Salt Creek Archeological District and cultural resources in the Canyonlands basin east of the park boundary.

This area is relevant because special management is essential to protect irreplaceable and vulnerable cultural resources from damage from increasing recreational use, pot-hunting, and energy exploration and development.

This area overlaps NPCA's nominated Canyonlands scenic ACEC.

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[Comment page 19]

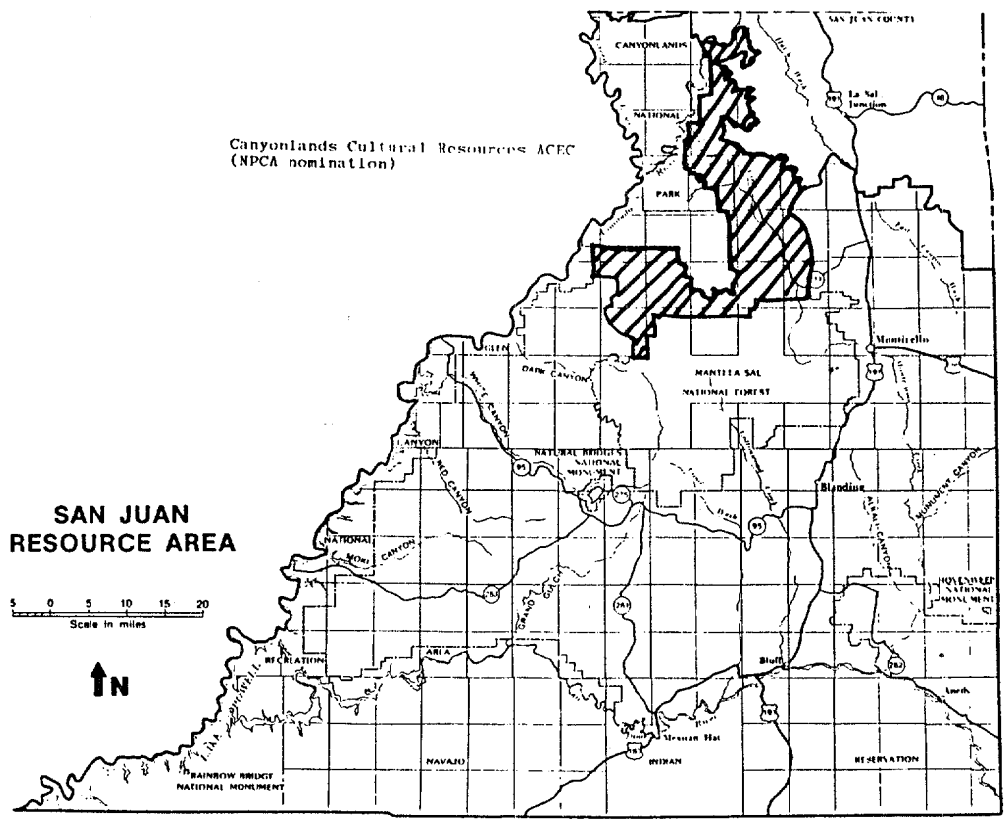
Canyonlands Cultural Resources ACEC. Not all of the area nominated in this comment has been considered as a proposed ACEC, but several portions of the large area nominated have been considered as potential ACECs.

Within the area nominated, the draft has been revised to consider the Beef Basin area as a potential ACEC for natural, cultural, and scenic values under alternative D. (The comment here mentions only cultural values; see response above concerning scenic values. The lower Indian Creek Canyon and the Butler Wash area, also within the area nominated by commentor, are considered as potential ACECs for scenic values under alternative E.)

In the draft, the North Abajo area, part of this nomination, was considered as a potential ACEC for cultural values under alternatives C and D, with the smaller Shay Canyon area considered under alternative E. Fable Valley is part of the Dark Canyon potential ACEC considered under alternative E.

In the draft, the central part of the Beef Basin area was considered as a potential archaeologic district under alternatives C and D (draft figures 2-9 and 2-10). The draft has been revised to consider the Beef Basin area (which is the southwestern portion of the area nominated by commentor) as a potential ACEC for cultural values under alternative D. (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.)

Outside of the North Abajo and Beef Basin areas, no other portion of the area nominated by commentor was found to have potential for ACEC designation based on cultural resources. This comment's rationale for areas other than North Abajo and Beef Basin rests on protection of values on public lands to protect values within NPS units. As stated above, Congress did not direct that public lands be managed to preserve park values.


Canyonlands Cultural Resources ACEC
(NPCA nomination)
SAN JUAN
RESOURCE AREA
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CANYONLANDS
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Monticello
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Mexican Hat
NAVAJO
INDIAN
RESERVATION
RAINBOW BRIDGE
NATIONAL MONUMENT
RECREATION
AREA

Natural Bridges Scenic and Cultural ACEC

NPCA nominates an ACEC to protect important scenic and cultural resources adjacent to Natural Bridges National Monument. Further analysis is needed to specifically determine the boundaries of this area. The study area should include, at a minimum, Harmony Flat and the lands between the Monument and the National Forest boundary, including Woodenshoe Buttes, the Toe and Deer Canyon. A viewshed analysis is necessary to identify those lands visible in this area from major visitor viewing areas (including the park road); and additional cultural resource inventories are necessary to determine the location and significance of cultural resources in this area, especially as they relate to cultural resources within Natural Bridges National Monument.

Natural Bridges National Monument was established to preserve and protect three outstanding natural bridges in the White Canyon system and the exceptional archeological sites within the canyon system and on the mesa tops.

The "viewshed lands" visible from Natural Bridges are important because their protection is significant to visitor enjoyment of Natural Bridges National Monument. Viewing the bridges and their scenic backdrops is the major visitor activity at Natural Bridges.

The cultural resources in this area are important because they are scientifically related to sites within the Monument.

The cultural and scenic resources are relevant because special management actions are required to protect them from irreparable harm from other proposed land uses including land treatments.

Hovenweep Scenic and Cultural ACEC

NPCA supports BLM nomination of a 2000 acre ACEC surrounding the Square Tower unit of Hovenweep National Monument as an ACEC to protect cultural and scenic values.

As BLM notes, this area is important because it contains cultural resources important to the understanding and interpretation of cultural resources within Hovenweep. According to the October 1985, Hovenweep EA for the GMP, the reason behind the construction of the Hovenweep tower may lie within cultural resources located in this area. Also, the area is believe to contain the remains of agricultural activities that may have

[Comment page 20]

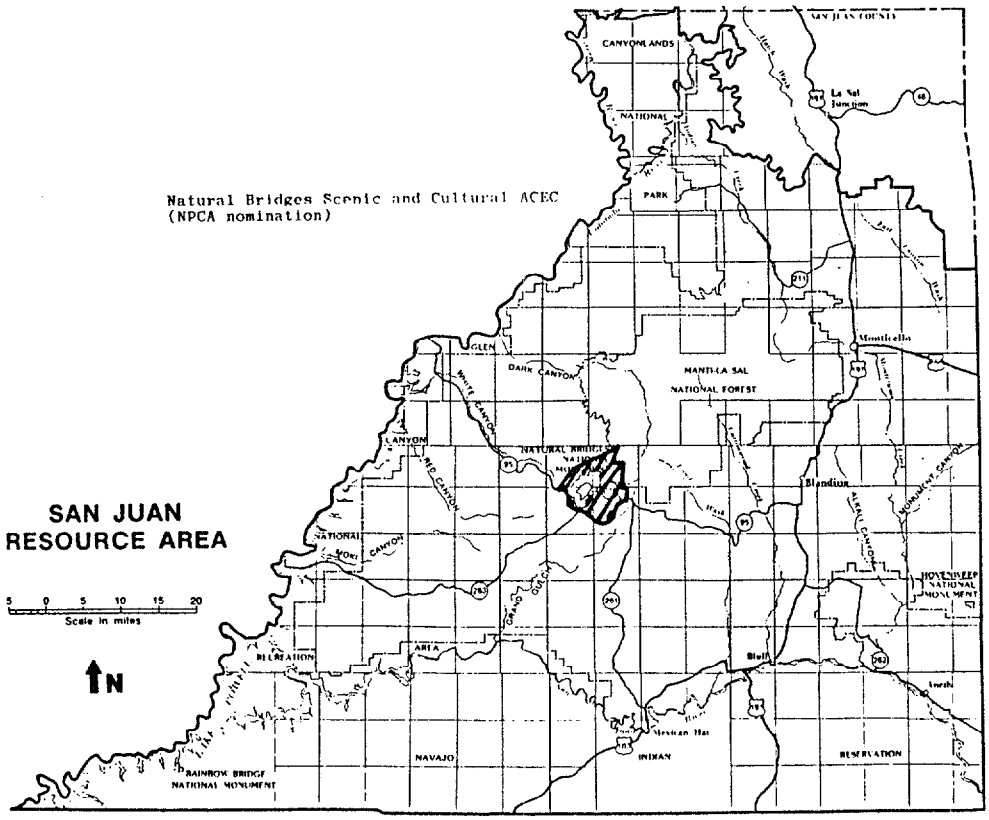
Natural Bridges Scenic and Cultural ACEC. Not all of the area nominated in this comment has been considered as a proposed ACEC, but a portion of the area nominated has been considered as a potential ACEC.

The comment nominates the area around the Natural Bridges NM to protect scenic and cultural values, but does not identify the cultural resources at risk. The viewsheds identified as being at risk are the lands visible from the NM. As stated earlier, Congress did not direct that public lands be managed to preserve park values.

BLM manuals establish the criteria for consideration of an ACEC based on scenic values. The only part of the area nominated that was found to meet the criteria for scenic values was the corridor along highway U-95 (see the response to comment 9, Southern Utah Wilderness Alliance). The remainder of the area nominated by commentor does not meet the criteria.

The comment does not identify any specific cultural resources outside of the NM as being at risk. BLM's review did not identify cultural values in the area to be in need of special protection; therefore, the area nominated was not found to have potential for ACEC designation based on cultural resources.

Hovenweep Scenic and Cultural ACEC. The area nominated by commentor has been included in the proposed RMP as a proposed ACEC, in response to negotiations between BLM and NPS (see the revisions to draft chapter 5). The 1500-acre proposed ACEC is the area requested by NPS, and is slightly different from the 2,000 acres shown as a potential ACEC in draft alternative D. The BLM-NPS agreement covers lands managed under the San Juan/San Miguel RMP as well, and will act to ensure consistency across the state line. (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.)


Natural Bridges Scenic and Cultural ACEC
(NPCA nomination)
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NATIONAL FOREST
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RAINBOW BRIDGE
NATIONAL MONUMENT
HOVENWEEP
NATIONAL
MONUMENT

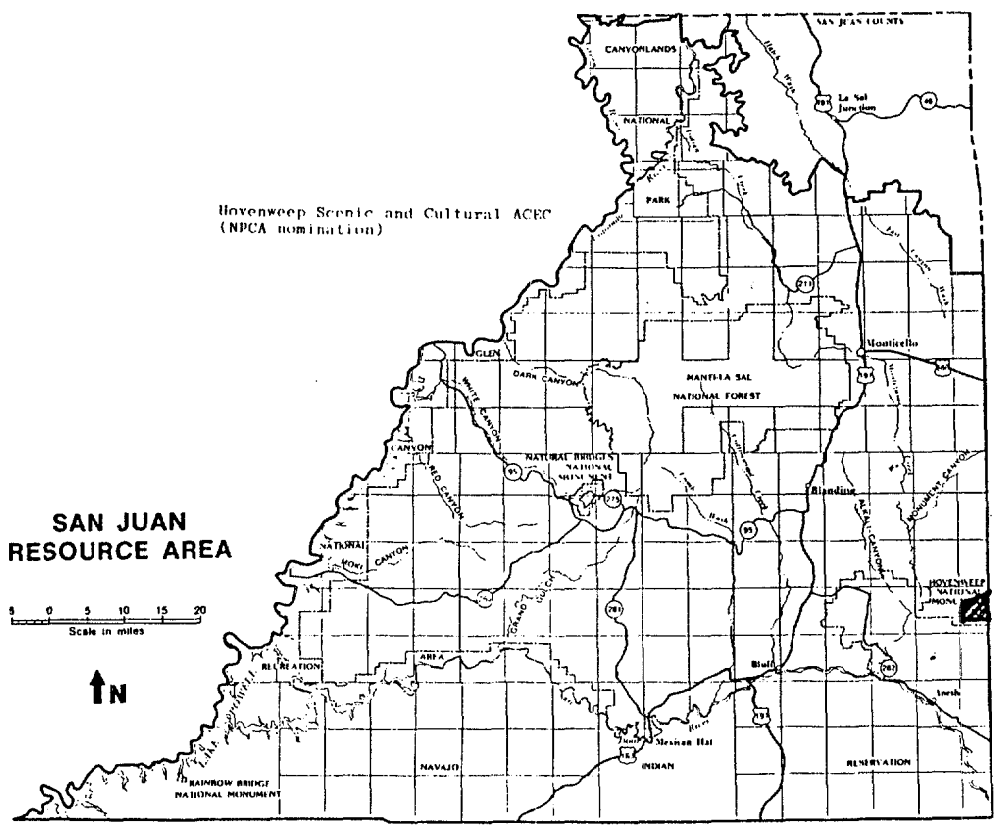
supported the Hovenweep culture.

This area is also important as part of Hovenweep's "historic scene." The area is essentially undisturbed by any noticeable signs of man and provides a compatible setting for visitors viewing Hovenweep's historic scene.

Furthermore, the importance of designating this ACEC is emphasized by the comparable ACEC proposed by the BLM's San Juan/San Miguel RMP and EIS (Final, Dec. 1984) That Plan proposes an "Anasazi Culture Multiple Use ACEC" which recognizes the special need for protection of the rich archeological values adjacent to Hovenweep. Similar concerns require similar protection within the SJRA, particularly in light of the obligation to assure consistency with the plans of other federal agencies. Those consistency requirements mandate a detailed explanation of this significant inconsistency.

This area is relevant because it needs special management attention to assure that its "historic scene" values and cultural resources are not harmed by energy exploration and development.

Grazing practices also need to be reviewed for this area. Grazing can adversely affect cultural resources. BLM needs to provide an analysis if current or proposed grazing activities in this area are harming cultural resource.


Hovenweep Scenic and Cultural ACEC
(NPCA nomination)
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MANTI-LA SAL
NATIONAL FOREST
NATURAL BRIDGES
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MONUMENT
Monticello
Blanding
Bluff
Mexican Hat
La Sal
Junction
HOVENWEEP
NATIONAL
MONUMENT

Glen Canyon NRA Scenic, Natural, Cultural and Wildlife ACEC

NPCA nominates all lands within Glen Canyon NRA that are located within the SJRA as an ACEC to protect scenic, natural, wildlife and cultural values. The management objective of this ACEC would be to assure that BLM administration of grazing and minerals is fully consistent with the protection of the scenic, scientific, recreation and historic values for which Glen Canyon NRA was established.

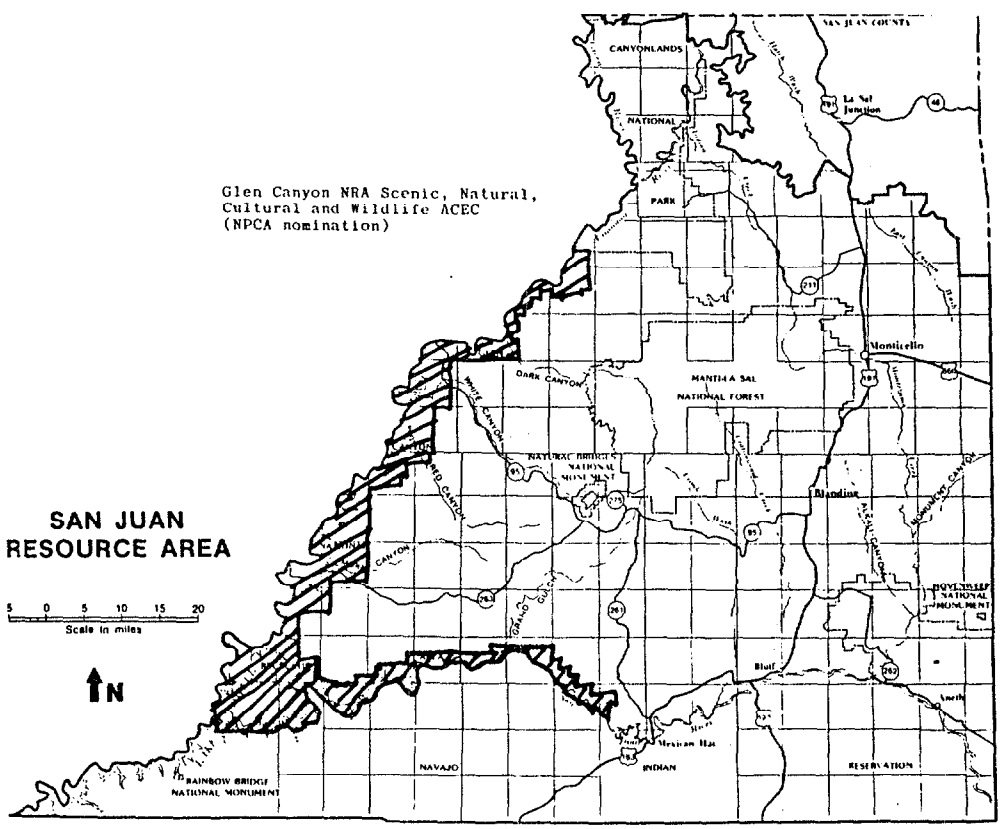
Although Glen Canyon NRA is a unit of the NPS and managed under the authority of the NPS Organic Act and Glen Canyon's enabling legislation, the BLM has certain administrative responsibilities for grazing and minerals in the area. Relevance exists because of the potential conflicts between management of grazing and minerals and protection of the values for which the NRA was established.

The area's importance has been recognized by Congress when it established the NRA. Natural values in certain portions of the NRA have been given additional recognition through NPS zoning and wilderness recommendations reflected in the NRA's general management plan.

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 22]

Glen Canyon NRA Scenic, Natural, Cultural and Wildlife ACEC. BLM has no authority to consider or implement special designations upon land managed by NPS. BLM's management responsibilities in Glen Canyon NRA are limited, and do not fall within the purview of an ACEC designation (see revisions to draft pages 1-6 and 5-6).


Glen Canyon NRA Scenic, Natural, Cultural and Wildlife ACEC (NPCA nomination)
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Scale in miles
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ALKALI CANYON
BOYNTON
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MONUMENT
Bluff
Mexican Hat
NAVAJO
INDIAN
RESERVATION
RAINBOW BRIDGE
NATIONAL MONUMENT

Cedar Mesa ACEC

NPCA nominates the proposed Cedar Mesa Archeological District (349,640 acres) for ACEC designation to protect important cultural, natural and scenic values. The boundary of this area should be consistent with the area identified by the BLM in the draft SJRMP under alternatives C & D as the proposed Cedar Mesa Archeological District.

This area is important because of its nationally significant cultural resources, and outstanding natural and scenic resources.

BLM itself has proposed nomination of this area as a National Register District under alternatives C & D of the draft SJRMP. The area is significant because of the wealth of undisturbed BLM and Pueblo sites, as well as rock art panels. The area includes the Grand Gulch Archeological District and the Grand Gulch Primitive Area, already recognized for their national significance.

The area is also important because of its outstanding natural and scenic values which have attracted national attention. It includes Slickhorn Canyon, Fish Creek, Road Canyon and Mule Canyon WSAs as well as additional lands recommended by the Utah Wilderness Coalition (a coalition of national, regional and state organizations) for wilderness designation. It also includes Comb Ridge, a remarkable natural geologic phenomena and landmark. Natural and scenic values in this area are prized and promoted by several national outdoor skills organizations, including the National Outdoor Leadership School and Colorado Outward Bound.

Relevance exists because special management measures are necessary to provide continued protection to the cultural, scenic and natural values of this area. Proposed land treatments, energy exploration and development and recreational use present potential conflicts with resource protection. Cultural resources in this area are particularly vulnerable to pot-hunting and increasing recreational use.

BLM nominates a portion of this area--Grand Gulch--as an ACEC. NPCA requests BLM to provide reasons why the larger Cedar Mesa area was not also nominated.

NPCA also supports ONA designation for this area.

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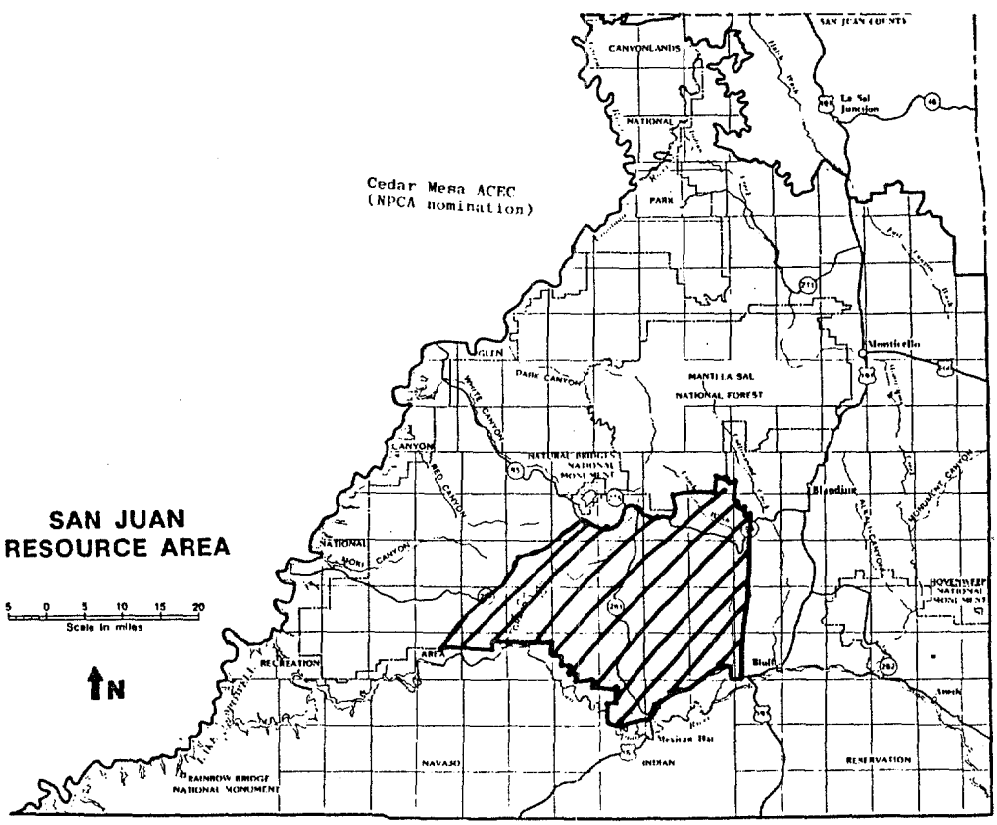
[Comment page 23]

Cedar Mesa ACEC. BLM agrees with commentor's suggestion and has considered this area as a potential ACEC in the final EIS. The entire Cedar Mesa SRMA is considered for ACEC potential under alternative D, and a modified area is considered under alternative E. (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.)

BLM has dropped the ONA designation in favor of the ACEC designation. An ACEC cannot be designated on the basis of recreational values alone (43 CFR 1610.7-2(a)(1)).


Cedar Mesa ACEC
(NPCA nomination)
SAN JUAN
RESOURCE AREA
Scale in miles
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NATIONAL BRIDGES
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NAVAJO
INDIAN
RESERVATION
RAINBOW BRIDGE
NATIONAL MONUMENT

Alkali Ridge

NPCA supports BLM's nomination of a 170,320 acre Alkali Ridge ACEC to protect important cultural resources.

As the draft SJRMP notes, the cultural resources of this areas are important because of the presence of Basketmaker and Pueblo sites, often reaching densities of 200 sites per square mile. And as the draft SJRMP notes, protection of cultural resources found here is relevant because they are irreplaceable and extremely vulnerable. Oil and gas exploration and development, vandalism (pot-hunting), road construction and maintenance and vegetation manipulation activities have threatened cultural resources in this area in the past.

NPCA questions BLM's recommendation in the preferred alternative to reduce the 170,320 acre ACEC to a 35,890 acre ACEC. BLM offers no rational grounds for limiting the ACEC to the smaller area, and fails to explain why the larger area does not meet the ACEC requirements.

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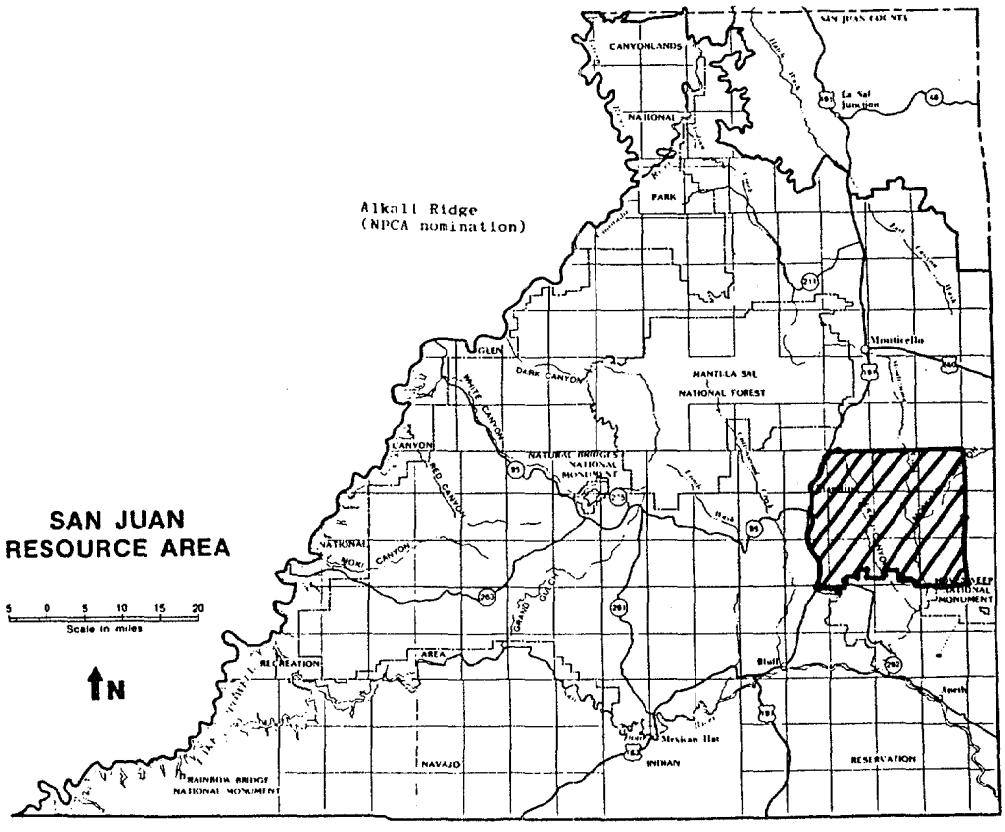
RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 24]

Alkali Ridge. BLM has revised draft appendix H to clarify the rationale for selecting the smaller area for the proposed Alkali Ridge ACEC.


Alkali Ridge
(NPCA nomination)
SAN JUAN
RESOURCE AREA
Scale in miles
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CANYONLANDS
NATIONAL
PARK
GLEN
CANYON
NATIONAL
RECREATION
AREA
NATURAL BRIDGES
NATIONAL
MONUMENT
MANTI-LA SAL
NATIONAL FOREST
Monticello
Blanding
Bluff
Mexican Hat
INDIAN
RESERVATION
NAVAJO
RAINBOW BRIDGE
NATIONAL MONUMENT
DARK CANYON
WHITE CANYON
RED CANYON
GRAND GULCH
La Sal Junction

White Canyon ACEC

NPCA nominates the White Canyon complex as an ACEC to protect important cultural, scenic and natural values. Further study will be needed to specifically determine boundaries, but the study area should include those lands north of Utah highway 95 and south of the Dark Canyon Plateau and the Manti-La Sal National Forest. This area includes Cheesebox, Gravel, Long and Fortnaker Canyons.

The scenic resources in this area are important because they are viewed and highly valued by regional and national tourists travelling along Utah highway 95. The scenic value of this area was recognized in the late 1970s in the U-95 Corridor Study prepared in 1976. The "Study Findings" on pp.5-6 state:

> Preservation of the visual corridor is a vital issue in consideration of any use, management of development scheme for the area. Picturesque views of a natural canyonlands landscape are continuous along the highways. Visual elements within the corridor and the vistas beyond are threatened if uncontrolled or ill-planned development encroaches.

The high public value of the area's scenic and natural qualities is also recognized by the proposed wilderness designation for the area by the Utah Wilderness Coalition--a coalition of national, regional, and state organizations. The area has also received national recognition for its outstanding scenic and natural qualities by outdoor skills organizations, including the National Outdoor Leadership School and Colorado Outward Bound.

Information on the cultural resources of this area is limited because of limited inventory. What is known is that existing sites are important because they are largely undisturbed. Additional inventory is necessary to determine and protect cultural resource values.

The area meets the relevance criteria because special management is needed to protect its cultural and scenic and natural resources. The Highway Corridor Study notes this need.

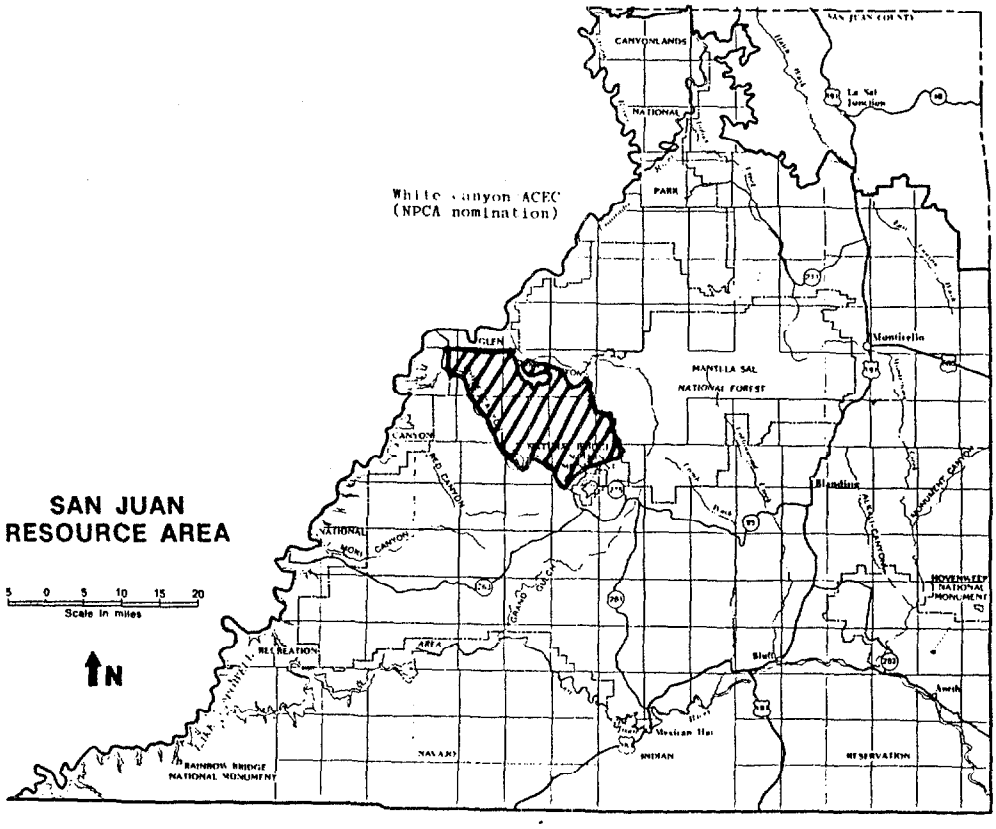
NPCA also supports an ONA designation for this area.

[Comment page 25]

White Canyon ACEC. BLM agrees with commentor's suggestion and has considered this area as a potential ACEC in the proposed RMP and final EIS (although the area does not qualify on the basis of cultural values). The White Canyon area assessed under alternative D in the proposed RMP and final EIS is larger than the area nominated in the comment, to accommodate other public comments (see the responses to comment 6, from the Sierra Club, Cache Group and comment 9, from the Southern Utah Wilderness Alliance). A smaller area is included in the proposed RMP as part of the Scenic Highway Corridor proposed ACEC along U-95. (See revisions to the summary, chapters 2, 3, and 4, and appendixes A, H and I of the draft.)

The comment nominates the area in part to protect cultural values, but does not identify specific values as important (and instead states values are unknown). BLM's review of the area nominated did not identify cultural values present to be in need of special protection beyond that stated in appendix A of the draft; therefore, the area nominated was not found to have potential for ACEC designation based on cultural resources.

BLM has dropped the ONA designation in favor of the ACEC designation. An ACEC cannot be designated on the basis of recreational values alone (43 CFR 1610.7-2(a)(1)).


SAN JUAN
RESOURCE AREA
5 0 5 10 15 20
Scale in miles
N
White Canyon ACEC
(NPCA nomination)
CANYONLANDS
NATIONAL
PARK
La Sal
Junction
Monticello
MANTILA SAL
NATIONAL FOREST
GLEN
CANYON
NATIONAL
MONU
CANYON
Blanding
HOVENWEEP
NATIONAL
MONUMENT
RECREATION
Bluff
Aneth
Mexican Hat
NAVAJO
INDIAN
RESERVATION
RAINBOW BRIDGE
NATIONAL MONUMENT

Moki-Red Canyons ACEC

NPCA nominates the area between and including Moki and Red Canyons as an ACEC to protect important cultural resources. (See map.) Further study and inventory is necessary to specifically determine the appropriate boundary for this area, but the study area should include the upper ends of Red, Cedar, Forgotten and Moki Canyons and North Gulch and upper Lake Canyon.

Cultural resources are important in this area because they are significant to the understanding and interpretation of cultural resources in Glen Canyon that have been irreplaceably destroyed by Lake Powell. Cultural resources in this area are important to understanding and interpreting data from pre-inundation studies and inventories completed in the lower ends of these canyons. NPCA understands that cultural resources in the NRA portions of Lake and Moki canyons have been found eligible for National Historic Register designation. Additional inventory is needed to determine the significance and interrelationship of cultural resource in the upper ends of these canyons to those in the NRA.

Relevance exists because cultural resources are vulnerable to damage from recreational and energy exploration.

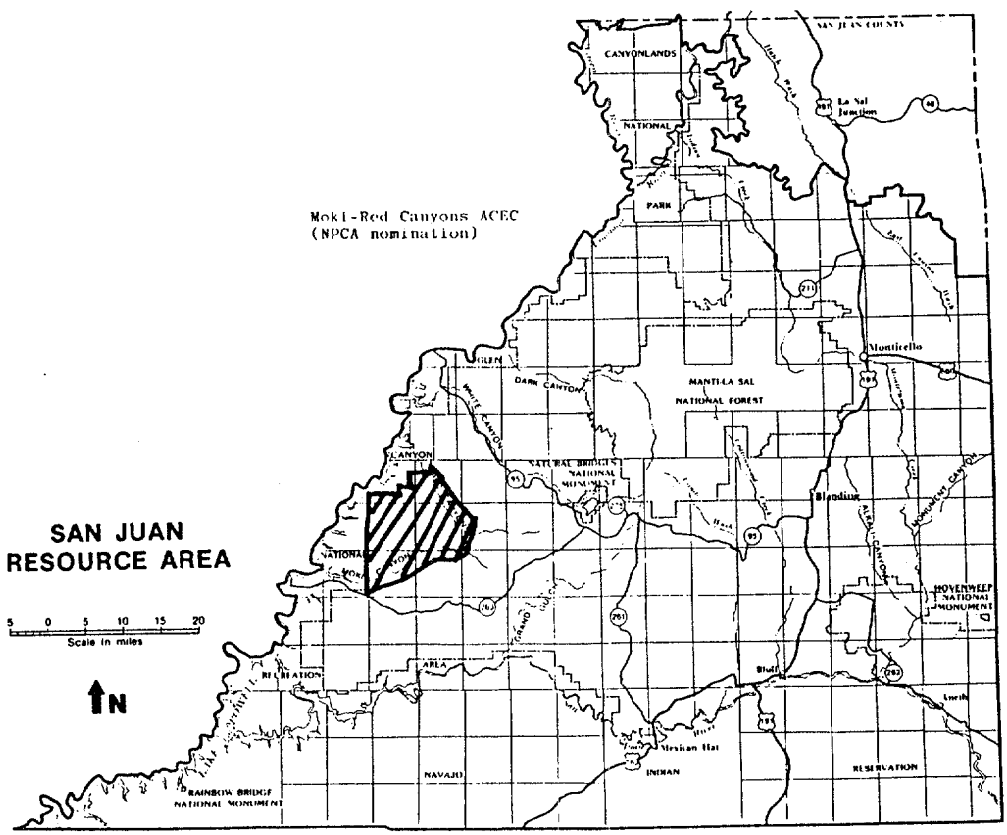
RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 26]

Moki-Red Canyons. This area has been considered for ACEC potential in the final EIS under alternative D, based on the rationale supplied by another commentor (see the response to comment 6, Sierra Club, Cache Group).

This comment nominates the area to protect cultural values. The cultural resources identified in the comment as being important are those in Glen Canyon NRA; important sites on public lands are not identified. As stated above, Congress did not direct that public lands be managed to preserve park values.

BLM's review of the area nominated did not identify cultural values present to be in need of special protection beyond that stated in appendix A of the draft; therefore, the area nominated was not found to have potential for ACEC designation based on cultural resources.


Moki-Red Canyons ACEC
(NPCA nomination)
SAN JUAN
RESOURCE AREA
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Scale in miles
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CANYONLANDS
NATIONAL
PARK
SAN JUAN COUNTY
La Sal
Junction
Monticello
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NATIONAL FOREST
DARK CANYON
WHITE CANYON
NATURAL BRIDGES
NATIONAL
MONUMENT
Blanding
ALTAR CANYON
MONUMENT CANYON
HOVENWEEP
NATIONAL
MONUMENT
Bluff
Mexican Hat
INDIAN
RESERVATION
NAVAJO
RAINBOW BRIDGE
NATIONAL MONUMENT
RECREATION
AREA

Dark Canyon and Middle Point ACEC

NPCA supports BLM's nomination of the Dark Canyon and Middle Point areas as ACECs to protect important scenic resources. We recommend that cultural resources also be included in the ACEC important resources which designation for special management.

As the draft SJRMP notes, this area is important because of its outstanding natural and scenic values which have already been recognized as significant under a Primitive Area designation. The area provides relatively rare recreational values in a pristine setting. The area is experiencing increased visitation from both private and commercial groups and has attracted national attention from the visiting public.

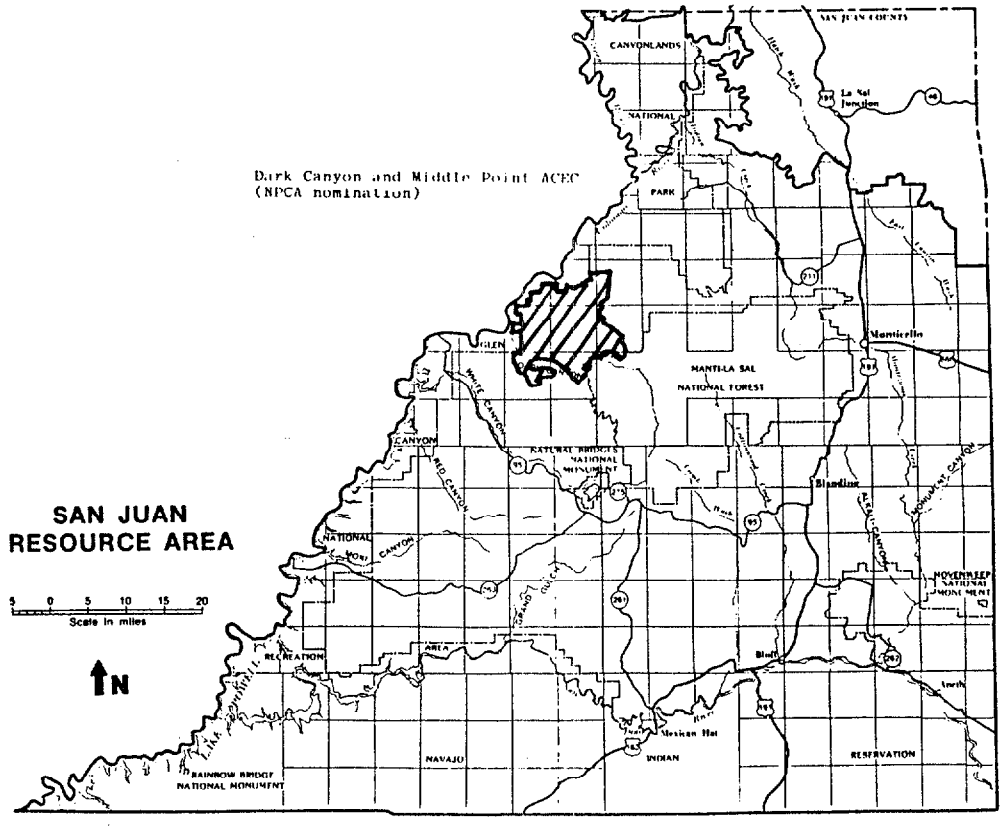
In view of its admitted scenic and cultural values, NPCA questions why BLM excludes the Middle Point Area in its ACEC recommendation under its preferred alternative.

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 27]

Dark Canyon and Middle Point ACEC. BLM appreciates the support of ACEC designation for the Dark Canyon Primitive Area. However, cultural values in the primitive area were not used to support the ACEC proposal; the ACEC was proposed based on natural values that lead to primitive recreation opportunities. BLM did not identify cultural values present to be in need of special protection beyond that stated in appendix A of the draft.

The comment does not provide rationale to support consideration of Middle Point as a potential ACEC. As stated above, BLM did not identify cultural values on Middle Point as needing special protection. To qualify for ACEC designation on the basis of scenic values, an area must have class A scenic quality; Middle Point has class C scenic quality. Therefore, Middle Point does not qualify as an ACEC for either scenic or cultural values.


Dark Canyon and Middle Point ACEC
(NPCA nomination)
SAN JUAN
RESOURCE AREA
5 0 5 10 15 20
Scale in miles
N
CANYONLANDS
NATIONAL
PARK
GLEN
CANYON
NATIONAL
RECREATION
AREA
NATURAL BRIDGES
NATIONAL
MONUMENT
MANTI-LA SAL
NATIONAL FOREST
Monticello
Blanding
Bluff
Mexican Hat
NAVAJO
INDIAN
RESERVATION
RAINBOW BRIDGE
NATIONAL MONUMENT
NOVEMBER
NATIONAL
MONUMENT

Recommended Management Prescriptions for ACECs

In order to assure adequate protection from irreparable harm of the important scenic, cultural, natural, and wildlife values identified in NPCA's ACEC nominations, we recommend the following management prescriptions. NCPA strongly recommends that the above listed ACECs and ONAs be:

> closed to oil and gas leasing, or, at a minimum, open to leasing with provisions to prevent surface occupancy. This is especially critical for "scenic" ACECs and ONAs.

> designated as limiting ORV use to designated roads,except in cultural ACECs where some roads may need to be closed to discourage vandalism and pot-hunting.

> withdrawn from mineral entry or at a minimum,BLM should require a Plan of Operations for any surface disturbing action that demonstrates there will be no harm to the important cultural resources or natural values.

> available for livestock use only if such use will not harm the values for which the ACEC or ONA was established.

> excluded from land treatments, range improvements and vegetative manipulations unless it is demonstrated that ACEC/ONA values won't be harmed.

> excluded from private and commercial use of woodland products.

> managed as Visual Resource Management (VRM) Class I areas, with only those projects that meet Class I objectives allowed. This provision should be applied to "scenic" and "natural" ACECs and ONAs.

NPCA believes that it is necessary to develop site specific activity plans for each ACEC to identify special management prescriptions for each area. We found no reference to preparation of these plans in the draft SJRMP.

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[Comment page 28]

Recommended Management Prescriptions for ACECs. BLM has prepared management prescriptions for potential ACECs that would be needed to protect the values identified as being at risk (see draft appendixes A and I, as revised). IBLA has directed that the level of management imposed on an area should be the minimum level needed (76 IBLA 395 (1983)).

Management prescriptions are developed for an ACEC on a case-by-case basis; one exception is the regulatory requirement that a plan of operations be filed for use of mining claims within an ACEC, except for casual use (43 CFR 3809.1-4; draft page A-75).

BLM manual section 1617.82 C. provides that alternative multiple-use management precriptions be presented in the RMP/EIS for each potential ACEC analyzed; these conditions would be carried into the RMP for each ACEC designated. Because of this specific detail, activity plans may not be required for each ACEC designated. The draft provides for the development of activity plans where needed (draft page A-29; see also, for example, draft page 2-6).

6. BLM has failed to adequately address cultural resource management in the draft SJRMP.

The MSA accompanying the draft SJRMP notes that "archeologically, the SJRA is one of the richest locales under BLM management," with approximately "10,000 recorded sites on the public lands." The plan also says that archeologists "estimate that the SJRA may hold as many as 200,000 archeological sites," but acknowledges that a mere 5 percent of the public land has been intensively inventoried.

The MSA admits that "the rates of disturbance and destruction of cultural resources appear to be accelerating" because of "impacts primarily from energy exploration and development, recreational use and pot-hunting." (MSA pages 4331-1 to 2)

The draft SJRMP further admits that "Protection of cultural resources in inadequate to ensure their availability for all proposed uses now and in the future . . . and the ability of the SJRA to provide adequate protection is limited by insufficient staffing and funding." It is particularly alarming that every alternative considered in the draft SJRMP shows significant continuing damage to archeological sites from illegal excavation, illegal surface collection, inadvertent damage during project development or rehabitation, recreation related site trampling and grazing. BLM's preferred alternative E represents little more than a meaningless gesture towards cultural resource management, reportedly allowing more than 15,000 sites to be damaged. Even BLM's most protective alternative D would allow BLM's own "Threshold for Significant Environmental Impact" to be exceeded for cultural resources. The threshold is "untreated disturbance to or loss of a cultural property."

Despite BLM's admission of the accelerating disturbance and destruction of cultural resources and the insufficiency of existing cultural resource management programs, BLM fails to recognize cultural resources as a Planning Issue.

BLM's explanation is that the need for protection of these resources is established by law and is beyond the discretion of BLM field office personnel. BLM cites no legal basis for the position it asserts. Nor can it establish that management practices or plans are irrelevant to practical protection of these cultural resources. BLM simply makes no effort to address the possibility of management alternatives designed for cultural resource protection. Yet both the appropriateness and feasibility of management designed to protect culturally-rich areas has been demonstrated by the adoption of the plans for an "Anasazi Culture Multiple Use ACEC," as proposed by the San Juan/San Miguel RMP (December 1984). That RMP for the San Juan/San Miguel Planning Area--an area in close geographic

[Comment page 29]

Adequacy of Cultural Resource Management in the Draft RMP/EIS

BLM recognizes the need to protect cultural resources (see the response to comment page 10). The preferred alternative provides several special designations for cultural resources (see revisions to draft table 2-2, page 2-20, and table 2-6, page 2-60, and appendix A). Special designations alone do not guarantee a particular level of management. BLM is confident that the management prescriptions presented for cultural resources are adequate.

proximity and with similar cultural resource management issues--includes cultural resources as a planning issue. The management objective under this issue was defined as the need to "determine management direction for important cultural sites and areas," Under "Needed Decisions," the Colorado RMP directs:

> identify cultural sites that will be developed, protected or stabilized and interpreted for public use and research;

> determine special designation or management guidelines for cultural sites.

The planning criteria also recognized the need to consider "the need for protection not afforded under existing laws."

NPCA suggests that the approach taken by the San Juan/San Miguel RA in Colorado provides a useful example of a proper and responsible approach to planning for cultural resource management. Also, NPCA points out that developing a cultural resource plan in this manner would allow BLM to highlight the serious need for additional funding for cultural resource management in the SJRA.

Of particular concern is BLM's admission of its extremely limited inventory base for cultural resources in the SJRA. Despite the area's wealth of cultural resources and the threats to the welfare of these resources, BLM notes that it has only intensively inventoried 5 percent of the public lands.

Despite the gross inadequacy of the available information about cultural resources and the admitted seriousness of the impacts to those resources, the SJRMP fails to address the importance of that serious deficiency in its resource inventory. Yet reliance upon that data is crucial to determining the environment to be addressed and the environmental impacts of the various management alternatives.

In lieu of adequate data, BLM relies on gross estimates of approximately 40 cultural sites per square mile, with some unexplained variations "where site densities are known to be higher or lower." (SJRMP, Appendix Y, page A-195)

Similar basic information gaps arise in analyzing the potential damaging impacts that may result from proposed management actions. BLM offers a completely unexplained estimate that "most management actions" will result in a damage ratio of 1 to 10 (one site damaged out of ten sites present) but varying to ratios of 1 to 20 or 1 to 1000 where management may result in "less intense" surface disturbance.

None of these estimation techniques, or the resulting estimates, comply with the applicable NEPA regulations. Where

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 30]

The RMP team reviewed the San Juan/San Miguel RMP (draft page 5-7). A comparison of the management actions allowed under the San Juan/San Miguel RMP and the preferred alternative of this draft does not neccessarily show that southwestern Colorado has a more appropriate program of cultural resources management, as stated in the comment. The draft identified proposals that are analogous to the San Juan/San Miguel RMP decisions cited in this comment (draft page 2-6, tables 2-2, 2-5, and 2-6, and Appendixes A, H, and I).

BLM provided for the collection of additional cultural resource inventory data (draft page 2-6) and acknowledged that a data gap for cultural resources exists (MSA pages 4331-16 and 4331-27). The estimate of 40 sites per square mile was based on the inventory data available; the draft did not represent estimates as substitutes for actual inventory data. The suggestion that the RMP be delayed until the entire SJRA is inventoried for cultural data is infeasible, because this could take decades. BLM believes that estimating data and impacts is acceptable and complies with NEPA. BLM is confident that the draft RMP/EIS complies with CEQ requirements for disclosing incomplete data and estimating impacts; the "worst case analysis" requirement has been rescinded by CEQ (40 CFR 1502.22, as amended May 27, 1986).

basic information necessary to environmental analysis is "incomplete" or "unavoidable," CEQ regulations require either a "worst case" analysis under former section 40 CFR Sec. 1502.22, or a substantial explanation of the basis for estimates pursuant to the amended version of that regulation, available at 51 Federal Register, page 15618 (April 25, 1986).

To properly address cultural resource management in the SJRMP NPCA recommends that BLM take the following actions:

> Issue a revised draft RMP/EIS which recognizes cultural resource protection as a planning issue.

> Using proper estimation techniques and preliminary inventories, identify and protect areas with potential cultural values until intensive inventories and evaluations are completed.

> On the basis of these inventories, develop management categories, ACECs and restrictive stipulations as necessary to protect cultural resources from energy exploration and development, ORV use, land treatments, vegetative manipulations, recreational use, etc.

> Adequately monitor for trend and condition changes.

> Increase patrols and surveillance of prevent pot-hunting.

> Increase evaluation and nomination of districts and sites for National Register Nomination.

7. Alternative E does not represent a balance of land uses and resource protection.

Although BLM represents alternative E as a balance of land uses and resource protection (P4-61), closer scrutiny of this alternative reveals that it continues to favor grazing, oil and gas development, and minerals management while providing only minimal protection to natural, scenic and wilderness resources.

This is particularly notable in BLM's failure to propose areas for ACEC and ONA designation in alternatives C & D. Meanwhile, in that alternative,even though recommended, S-13 notes that alternative E will continue mineral uses at about the current level and increase stock forage. Similarly, the draft SJRMP (P.2-16) notes that conflicts with mineral production and other resource conflicts will be resolved to allow for existing levels of livestock use.

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 31]

The fact that BLM did not identify cultural resource management as a planning issue is discussed in the response to comment pages 1 and 2 under identification of planning issues. BLM does not agree that a revised draft should be issued to consider cultural resource management. BLM believes that the draft, as revised in the proposed RMP and final EIS, adequately considers cultural resource management, including the points mentioned in the comment.

Balance of Land Uses and Resource Protection Represented in Alternative E

The comment states that the preferred alternative favors grazing, oil and gas development, and minerals management at the expense of natural, scenic, and wilderness resources. Review of draft table 2-10 shows that, for livestock grazing, there would be a loss of both area and income. For oil and gas development and minerals management, the analysis shows no significant economic change, and a loss in the area available for development with standard conditions (draft table 2-7). The analysis shows a gain in the area suitable for primitive recreation, a gain in the area within VRM class I, and a gain in economic benefits from recreation. The draft states that except for livestock uses (where no conflicts with recreation were identified), all surface-disturbing uses would defer to management for primitive recreation opportunities (draft pages S-4 and 2-16 and appendix A). The goal statement for the preferred alternative has been changed to reflect revisions made in proposed management (see revisions to the draft summary and page 2-15).

As stated above, the ONA designation, considered in alternatives C and D, has been dropped in favor of the ACEC designation; an ACEC cannot be designated on the basis of recreation values alone.

8. The draft SJRMP is difficult to understand and discourages public comment as a result.

While NPCA appreciates the fact that producing a land use plan for a 1.8 million acre area is difficult and unavoidably complex, the draft SJRMP is nonetheless difficult or impossible for the general public to understand. As a result, it discourages public comment.

Some examples:

> Basic inventory data was contained in the Management Situation Analysis (MSA) and meaningful review and comment on the RMP required review of the MSA. BLM's public comment announcement did not make this clear however, and even if people did try and get copies of the MSA they were not available. (NPCA requested a copy in late June and reportedly was sent the last one available for public distribution.)

> There are no oil and gas category maps for alternatives A, B, C & D. It is impossible to compare or comments on oil and gas leasing alternatives without maps.

> There are no ORV management maps, making it impossible to compare or comment on ORV management under various alternatives. It appears that proposed ROS categories and ORV management is inconsistent but it is impossible to tell for sure.

> BLM used acronyms like C&MU classification and R&PP leases without explaining what they mean.

> At 2-5 the draft SJRMP says that forest lands will be assigned to 1 of 4 categories and that the RMP will describe management objectives used to determine that assignment. NPCA could find no management objectives so described.

> The draft SJRMP fails to explain the four cultural resource management categories identified in the Plan. The plan sends the reader to the glossary for explanation but explanation doesn't exist in the glossary.

> There is no map of lands proposed for disposal under various alternatives making it very difficult to comment on disposal proposals.

9. General Comments

Budgeting: NPCA requests that the final RMP show how available budgeting levels could affect implementation of the plan. What activities will be given priority?

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 32]

Difficulty in Understanding the EIS

BLM appreciates that the draft RMP/EIS is a complex document covering a complex area. A review of comments received indicates that not all reviewers agree that the document was difficult to understand.

BLM does not agree that the the complexity of the document discouraged public comment. As can be seen in the list of commentors, the draft generated well over 100 comments within the comment period, three to four times as many comments as have been received on other draft RMPs prepared in Utah.

The BLM planning process dictates preparation of the MSA separately to document inventory results and provide a base for the draft (draft page I-5 and 43 CFR 1610.4-4); there is no provision to circulate the MSA for public review (BLM manual section 1616.4).

Oil and gas categories and ORV designations under the various alternatives follow the generalized land-use management maps in the summary (draft figures S-1 through S-4). Refer also to the response to comment pages 11 and 12. All acronyms used in the text are in the list of acronyms on page B-15 of the draft.

The four general categories for forest management are listed on page 2-5; the management objectives for forest management are listed on page 2-55; the management prescriptions for forest management are listed on page 2-66. The management prescriptions tie back to the categories, but are more specific.

The intent of the next comment is unclear to BLM. The draft does not use four cultural resource management categories; it does reference seven cultural resource uses (draft page 2-6), which are defined in the glossary and explained in detail in the MSA (pages 4331-7 and 4331-8). This system has since been changed (see revisions to draft page 2-6 and glossary).

The lands proposed for disposal under the different alternatives were not mapped due to the scale of maps used and the small parcels involved. A complete legal description was given in draft appendix Q, and the tracts can be picked out in figure I-5 (draft page I-15).

General Comments.

Budgeting. BLM cannot forecast budget levels during the ten years of plan implementation, and therefore cannot comply with the request to show how available budgeting levels could affect RMP implementation. The RMP alternatives were developed under the assumption that funding would be provided to implement RMP decisions (draft page 1-2).

ORV Management: The Plan appears to leave lands open to ORV use unless an area is specifically designated as limited or closed. NPCA believes that this is poor stewardship of public resources. ORV use can damage cultural sites, vegetation, scenic resources, etc. A proper approach to ORV management is to designate the planning area limited to existing roads and trails, and then close roads as necessary to protect resources. Open areas should be limited to specifically defined areas designated for recreational ORV use, such as was done in certain sand dune areas.

ROS Categories: NPCA understands that ROS categories can be established on the basis of manageability as well as existing conditions. We request that either SPM areas be provided increased protection against disturbance (adopt the management prescriptions identified for SPNM areas) or reconsidered for designated as SPNM on the basis of manageability. For example, primitive dirt roads in the Canyonlands basin result in most of the basin being designated SPM and excluded from protective stipulations provided for P and SPNM. Similarly NCPA questions the identification of lands in Davis and Lavender Canyons as RN.

Wildlife: The Plan notes that state wildlife goals will not be met under BLM's preferred alternative E. In compliance with its consistency obligations, BLM should provide a compelling reason for not meeting these goals or change management actions so they can be met.

Air Quality: BLM notes that it has identified existing primitive areas as areas to be managed to protect pristine air quality conditions and other air quality related values. NPCA requests that BLM also protect air quality and air quality related values in the Canyonlands basin lands. (See NPCA scenic Canyonlands ACEC surrounding Canyonlands. NPCA makes the same request for lands surrounding Natural Bridge National Monument (See NPCA scenic Natural Bridge ACEC)

10. Specific Comments on the draft SJRMP

Page 2-3: NPCA questions the designation of the entire SJRA as open to petrified wood collection. This may create additional threat to cultural resources because it could encourage vehicle use in fragile areas.

Table 2-5: This table repeatedly refers to protection of "certain" recreational and primitive recreational opportunities. What does this mean? Which areas are protected and which are not?

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 33]

ORV Management. The draft RMP/EIS applied the least restriction neccessary to resolve resource conflicts. Accordingly, lands would be designated as open to ORV use unless there was a documented resource conflict. On lands not designated as open, ORV use would be limited unless closing the area to ORV use was the only way to resolve the conflict.

ROS Categories. Upon review, BLM has revised inventory data for the roads in Davis and Lavender Canyons, and has changed these road corridors from ROS class R to class SPM (see revisions to draft table 3-11). ROS classes are based on the criteria in draft table 3-10 (see also draft appendix F).

Wildlife. FLPMA's consistency provisions do not obligate BLM to attempt to meet UDWR's prior stable numbers (see the RMP/EIS glossary). These numbers are estimates of maximum wildlife carrying capacity and do not represent a state land-use management plan. These populations could be achieved only under optimal natural conditions (such as weather or health) and if all other management conflicts were resolved in favor of wildlife (such as in draft alternative C).

Air Quality. Canyonlands NP is designated as class I air quality; public lands in SJRA (and Natural Bridges NM) are designated as class II air quality (draft page 3-28). BLM is obligated to maintain these levels, but not to attempt to attain a higher level of protection at the expense of other resource uses and values. BLM is confident that the preferred alternative would adequately protect air quality throughout the SJRA.

Specific Comments on the Draft RMP/EIS

Page 2-3. The wording regarding petrified wood collection has been changed in response to agency review; public lands do not need to be designated as open for petrified wood collection, only designated as closed where the resource is threatened (see revisions to page 2-3 of the draft). No such area was identified within SJRA. BLM does not agree that collection of petrified wood would threaten cultural resources.

Table 2-5. As discussed above, the ROS P and SPNM class areas that would be protected are defined on draft page 2-16 and in appendix A, draft page A-24.

Table 2-9: The table repeatedly refers to protection of SPNM classes "where possible." What does this mean? Which areas are protected and which are not?

Page 2-11: Recreational site development in the Canyonlands basin should be coordinated with the NPS to assure that it is compatible with NPS plans and policies and the protection of Canyonlands National Park values. Any additional recreational development in the basin should be limited to relatively small scale primitive campground development to assure that Canyonlands values are not impaired. Recreational development should also be consistent with carrying capacity studies underway in Canyonlands National Park. The location must be sensitively selected to assure not visual or noise intrusions on the park.

Page 2-47: NPCA objects to propose land treatments shown on Figure 2-15 within the 2000 acre protection zone identified by the NPS next to Hovenweep National Monument. What precisely is proposed? How will it affect cultural resources and Hovenweep's historic scene?

Page 2-47: NPCA questions the need and impact of land treatments identified on Figure 2-15 alternative E for the Cedar Mesa area. What is the purpose of these treatments? What will be done? How could they affect cultural resources and natural qualities? They overlap areas recommended for ONA and National Register designation under other alternatives.

Page 2-49: The Plan needs to give additional detail about how SRMAs would be managed. Increasing recreation in Beef Basin for example has been stated as a potential threat to cultural resources.

Page 2-74: The important cultural resources of Beef Basin should be recognized by limiting ORV use to existing roads and possibly closing some roads.

Page 3-38: NPCA requests that BLM consider setting additional areas off limits to forest wood harvesting. Appropriate areas include viewshed lands from Natural Bridges and other areas with high cultural values.

Page 3-52: Why don't oil and gas leasing categories coincided exactly with habitat areas if the oil and gas leasing categories along the San Juan River were intended to protect bald eagle habitat? Why isn't this problem corrected through the SJRMP?

Page 3-59: NPCA questions the purpose and impact of land manipulations and vegetative treatments in Harts Draw, Hurrah Pass, and Indian Creek allotments. NPCA has proposed these areas for protection as a scenic ACEC next to Canyonlands. What specifically is planned? How will it affect scenic values?

RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 34]

Table 2-9. The protection of SPNM class areas "where possible" is defined in draft appendix A.

Page 2-11. Recreation site development is addressed in activity planning, not in an RMP. The NEPA process gives interested parties the opportunity to comment on proposed developments at that time (draft pages 2-1, A-1, and A-29).

Page 2-47. Resource management within the resource protection zone, which NPS identified around Hovenweep NM, has been revised. Under the preferred alternative, the area is proposed as the Hovenweep ACEC. (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.) Land treatments would be allowed only if cultural and visual resources could be protected (see revisions to draft appendix I).

Page 2-47. The potential land treatment areas shown in the draft are physically suitable areas, not proposed projects. The draft is revised to clarify this, and to indicate that priority would be given to maintaining existing land treatments (see revisions to draft pages 2-6 and 2-68). Land treatments are done to increase livestock forage production to meet or maintain active preference levels. The method of treatment would be determined when a specific project was proposed. NEPA documentation at that time would assess impacts to other resources (draft pages 2-1, A-1, and A-29). Under the proposed RMP, the special conditions for Cedar Mesa proposed ACEC would have to be met.

Page 2-49. Details of SRMA management would be determined at the activity plan stage, not in the RMP. Under the proposed plan, SRMA management would have to meet the objectives and special conditions identified in the RMP for maintaining ROS classes.

Page 2-74. BLM did not identify a current conflict between ORV use and cultural resources in Beef Basin; therefore, limiting ORV use to protect cultural resources is not warranted. If RMP monitoring indicates a conflict in the future, the ORV designation could be changed (draft appendix B).

Page 3-38. Woodland products could be harvested only in designated areas, to be identified during project planning (draft page 2-5). NEPA documentation at that time will identify impacts to other resources and apply appropriate mitigation (draft pages 2-1, A-1, and A-29).

Page 3-52. The current oil and gas leasing categories along the San Juan River were mapped along an old river channel, and part of the eagle habitat was not protected as intended (the existing channel and eagle habitat are in a different place). The special conditions imposed under the preferred alternative would correct this problem (draft figure S-4 and page A-25).

Page 3-59. The draft proposes no land treatments for Hurrah Pass and Indian Creek allotments. Draft table 3-7 shows livestock manipulation techniques (grazing systems and range improvements) for these areas (draft appendix U). Proposed land treatments in the Hart Draw allotment would increase livestock forage; impacts to other resources (including scenic values) would be assessed later (see discussion of page 2-47, above).

Page 4-3: Critical threshholds defined here appear to be largely arbitrary. Why is a 25 percentage difference chosen as the threshold?

Page 4-7: This page notes that the acreage assigned to each of the oil and gas categories will not change. But the SJRMP says in A-99 that existing categories will be re-evaluated under the draft SJRMP to see if all concerns and conflicts are still valid. Are oil and gas categories reconsidered in this RMP or not? They are not effectively reviewed because there is no map, making public comment impossible.

Page 4-15: Why can't BLM amend seasonal conditions currently attached to existing oil and gas leases to protect deer winter range?

Page A-128: NPCA opposes the disposal of lands identified under alternative B (T 32 S R 19 E, Section 2, Lots 1,2, S1/2 NE 1/4) for disposal.

Page A-13-27: What is the basis for a 250 foot buffer around cultural sites? Why this size and not larger?

* * * *

In addition to the foregoing comments and requests concerning the draft San Juan Resource Management Plan, NPCA adopts and incorporates by reference the comments submitted by the Southern Utah Wilderness Alliance.

NPCA appreciates your thorough consideration of these comments.

Sincerely,

Terri Martin

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RESPONSE TO COMMENT 2 NATIONAL PARKS AND CONSERVATION ASSOCIATION

[Comment page 35]

Page 4-3. For most environmental indicators, the threshold of significant impact is not scientifically established. Where there is no standard, threshold levels were derived from consensus of the planning team. Refer to the response to comment page 10, Thresholds of Significance.

Page 4-7. The statement referenced in this comment refers to alternative A, current management. Under alternative A, oil and gas leasing categories would not change from the present situation. The other alternatives address different category applications and the impacts to oil and gas production from those changes. The current leasing categories are shown in draft figure 3-1. The category applications for other alternatives correlate exactly to figures S-1 through S-4. See the response to comment page 12, Oil and Gas Development.

Page 4-15. An oil and gas lease, once issued, is a legal contract between the Federal Government and the lessee. Lease amendments cannot be made without agreement of poth parties. Special lease conditions are established through BLM planning documents; the existing plan would have to be amended or changed prior to negotiating lease changes. The RMP now under preparation serves that purpose. However, lease conditions established through the new RMP would not apply to existing leases (draft page 2-1).

Page A-128. The comment opposing lands disposal is noted.

Page A-13, A-27. The 250-foot buffer was the maximum distance believed necessary to protect sites listed or eligible for listing on the National Register. It was determined by the RMP team archaeologist, based upon professional knowledge of the area and the types of direct and indirect impacts projected to occur.

For responses to the comments of the Southern Utah Wilderness Alliance, incorporated in this comment by reference, see the response to comment 9, Southern Utah Wilderness Alliance.

Change to the EIS? Yes.

COMMENT 3

Working for the Nature of Tomorrow

NATIONAL WILDLIFE FEDERATION

1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

COMMENTS OF THE

NATIONAL WILDLIFE FEDERATION

ON THE

DRAFT SAN JUAN RESOURCE MANAGMENT PLAN

AND ENVIRONMENTAL IMPACT STATEMENT

Submitted by

David Alberswerth, Director
Karl Gawell, Resource Specialist
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Public Lands & Energy Division
Resources Conservation Department

October 31, 1986

-1-

The National Wildlife Federation appreciates the opportunity to comment on the Draft San Juan Resource Management Plan/Environmental Impact Statement. The National Wildlife Federation is the nation's largest conservation/education organization, with 4.6 million members and supporters in 51 states and territories, including Utah. We have an abiding interest in the proper stewardship of our nation's public lands.

Our primary concerns about the draft San Juan RMP relate to the impacts on wildlife and the environment of proposed management proposals on the following eight issues: oil and gas leasing and development, livestock grazing, riparian/aquatic habitat management, ACEC's, threatened and endangered species management, withdrawal review, wilderness management, and coal and uranium development.

The Preferred Alternative (Alternative "E") is strongly slanted in favor of commodity exploitation, especially livestock grazing and energy development, rather than balanced stewardship of commodity exploitation activities with the protection of non-commodity values. This bias in favor of commercial exploitation is a violation of the

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 1]

BLM does not agree that the draft preferred alternative is strongly slanted toward commodity exploitation (see the response to comment 2, National Parks and Conservation, comment page 31). FLPMA requires public land management to be based on the principles of multiple use and sustained yield, unless otherwise specified by law (43 U.S.C. 1701(a)(7)).

Federal Land Policy and Management Act's (FLPMA) mandate that:

> ...the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use...[43 USC 1701(a)(8)]

Our specific comments follow.

Oil and Gas Leasing and Development

Under the Preferred Alternative, the entire Resource Area is open to oil and gas exploration and development activities, an increase of 10% of the current acreage open to oil and gas activities (p. 4-62). The bias in favor of oil and gas development could not be more blatant.

According to Chapter three of the draft EIS (Figure 3-1, p. 3-5), extensive oil and gas leasing is being allowed in prime wildlife areas (compare Fig. 3-1, p. 3-5 with Figs. 3-11 and 3-12, pp. 3-43 and 3-45). A large area characterized by sensitive soils and riparian/aquatic habitat is open to leasing, mostly without protective restrictions (compare

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[Comment page 2]

Oil and Gas Leasing Development

Not all of the SJRA is open to oil and gas exploration and development under the preferred alternative. Under the leasing category application proposed in the draft, no area would be closed to leasing, but 14 percent of SJRA would be closed to surface occupancy (lease exploration and development), compared to 15 percent under the current situation (as shown in draft table 2-7; acreages have been revised in the proposed RMP and final EIS).

This comment correctly notes that draft chapter 3 indicates conflicts between current leasing categories and other resource values; the draft analyzes alternative means of resolving those conflicts (draft summary and chapters 2 and 4). The draft also explains what specific mitigation requirements would be applied under each alternative to protect these areas (draft appendix A).

Fig. 3-1, p. 3-5 with Figs. 3-9 and 3-12, p. 3-31 and 3-45). Alkali Canyon, Monument Canyon, Red Canyon, Moki Canyon, and Cottonwood Creek are all identified as riparian/aquatic habitat areas (compare Fig. 3-1, p. 3-5 with Fig. 3-12, p. 3-45) and are all open to leasing with no provisions for the protection of riparian values. The Plan should examine and propose specific mitigation requirements for these areas.

Regarding the endangered bald eagle and leasing proposals discussed on pg. 3-52, the EIS states "...oil and gas leasing categories along the San Juan River were intended to protect 85,325 acres of bald eagle habitat but do not coincide exactly with habitat areas." The categories should be adjusted to coincide with eagle habitat to afford bald eagles in the resource area protection. Also, the EIS states that three endangered species of fish and one sensitive fish inhabit the San Juan River (p. 3-52). Yet the area is open to NSO leasing, as discussed infra, NSO stipulations are inappropriate.

Moreover, despite the draft plan's assertion that "The special conditions in category 1 could render some wells uneconomical to operate" (p. 4-62), the Acting Regional Solicitor for the Rocky Mountain Region has concluded that the Department "cannot use... [a no surface occupancy]

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[Comment page 3]

The draft preferred alternative (page A-20) provides that no surface occupancy could take place within a riparian area.

The draft notes that existing oil and gas leasing category application is insufficient to protect bald eagle habitat (page 3-52) and explores adjustments to correct this (in chapters 2 and 4). The current oil and gas leasing categories along the San Juan River were mapped along an old river channel, and part of the eagle habitat was not protected as intended (the existing channel and eagle habitat are in a different place). The special conditions imposed on oil and gas leasing under the proposed RMP would correct this problem (draft figure S-4 and page A-25). BLM is confident that the no-surface-occupancy stipulation is sufficient to protect the endangered fish.

Apparently questioning whether BLM can issue oil and gas leases with no-surface-occupancy stipulations, the comment quotes a Solicitor's Memorandum out of context. BLM is bound by laws and regulations, not by memorandums to the USGS. Mineral leasing is discretionary with the Secretary (30 U.S.C. 226); BLM is authorized under 43 CFR 3101.1-2 to apply special stipulations (includ- ing no surface occupancy) to oil and gas leases.

stipulation as an instrument to vitiate the inviolable right to drill given the lessee by the Mineral Leasing Act." (Memorandum from the U.S. Department of the Interior, Office of the Solicitor, Acting Regional Solicitor, Rocky Mountain Region, to John Matis, U.S., Geological Survey, October 10, 1980, p. 25.) If NSO stipulations do not adversely affect the lessee's "inviolable right to drill", how is it that the standard stipulations could "render some wells uneconomical to operate?" This assertion is unsupported, and in the face of the opinion of the Regional Solicitor appears to be an exaggeration of the impact of these restrictions.

In the Preferred Alternative E, there is no mention of provisions to protect bighorn sheep habitat in Mesa Tops, Red Canyon, Hoki Canyon, Dark Canyon, White Canyon, and Grand Gulch. There are only limited restrictions proposed in Alkali Canyon and Monument Canyon. It is stated (p. 4-66) that seasonal restrictions on oil and gas leases and combined hydrocarbon leases on 285,387 acres exist to protect the rutting season. But the location of these restrictions is not specified. Do these restrictions cover the above mentioned critical areas? Do they cover all types of development or just exploration and assessment? Also, there are no proposed restrictions other than NSOs and "limited surface use" mentioned for the San Juan River area

[Comment page 4]

Special lease conditions could render a potential well in a marginal location uneconomical to produce because the additional expenses incurred from complying with the lease terms could cut into the operator's profits. BLM believes this statement is a logical assertion, not an exaggeration.

Provisions to protect bighorn sheep crucial habitat apply to the area shown in draft figure S-4 and would apply to all surface-disturbing actions (draft appendix A, page A-21). BLM is not certain what this comment means by "Mesa Tops"; under alternative E, several provisions were imposed to protect bighorn sheep habitat on five specific mesa tops (draft table S-1, figure S-4, page 2-16, table 2-8, and page A-22). Grand Gulch falls outside the bighorn sheep crucial habitat (draft figure 3-11). The location of seasonal special conditions is stated in draft figure S-4 and on pages 2-58, 2-89, 3-41, and A-22. The extent of restriction is discussed in draft appendix A.

and other important riparian zones including Cottonwood Creek, Indian Creek, and Comb Wash (see, Fig. S-4, p. S-11 and p. 4-68). All riparian areas in the Resource Area should be placed off-limits to oil and gas leasing, exploration and development.

The document mis-applies seasonal restrictions. Seasonal restrictions may be appropriate for mitigating impacts from exploration and limited development activities. However, since seasonal restrictions may create serious safety hazard when applied to developed field operations they are of questionable use in mitigating the potential impacts of oil and gas operations. The Plan should identify and propose mitigating measures which will protect wildlife and other natural resources within the Resource Area from the impacts of field development and operations.

Effective means of protecting wildlife and important habitats are available, and necessary given the documented problems oil and gas exploration and development activities cause wildlife. In general, the Plan fails to meet its statutory obligations regarding the potential adverse impacts of oil and gas development. The Bureau should fulfill its obligations under FLPMA and ESA to protect wildlife and their habitats by carefully delineating areas

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 5]

Special conditions developed for riparian areas would allow no surface occupancy within actual riparian areas (draft page A-20); oil and gas lease exploration and development would not be allowed.

The comment does not explain what safety hazard could ensue from applying seasonal restrictions to oil and gas field operations. The RMP team wildlife biologist determined that seasonal stipulations would reduce stress on wildlife populations during critical periods of the year, and that yearlong special conditions were not warranted.

BLM is confident that the draft meets the statutory obligation to consider the potential adverse or beneficial impacts on wildlife habitats from oil and gas development under different scenarios. Alternative B assessed the impacts to wildlife that would result if no special conditions to favor wildlife were applied to oil and gas leasing; alternative C, impacts if public lands were managed to maximize wildlife populations; alternative D, impacts if large areas of crucial habitat were closed to leasing; and alternative E, impacts if the seasonal stipulations were applied (draft summary and chapter 2). The impact analysis indicates that wildlife would benefit under the preferred alternative (draft table 2-10 and chapter 4).

such as crucial winter habitats, calving areas, escape and critical cover areas, etc., for each specie, designating these habitats Areas of Critical Environmental Concern, and segregating them from mineral development. We recommend that this method of habitat protection be used in all management units where crucial winter, mating and parturation areas, riparian areas, and endangered species habitats have been identified in the plan. If the Bureau has not completed such an examination, then it simply should not allow further leasing in the Resource Area until it has met its statutory obligations.

The Bureau's broad reliance on NSO and site specific stipulations do not fulfill the Bureau's obligation under FLPMA and the Endangered Species Act to protect wildlife and their habitats. This is because the decision to terminate such stipulations is discretionary, can be accomplished without public notice and comment, and so can be used to circumvent the Bureau's obligations under NEPA, FLPMA, and the ESA to examine and mitigate potential adverse impacts of development, including cumulative impacts. Leasing in such areas using NSO's may in fact invite pressure from the oil and gas industry to seek significant changes in the Resource Area's management outside of the planning process.

[Comment page 6]

Crucial habitat areas were delineated in draft figures 3-11 and 3-12.

Wildlife habitats were examined (draft appendix H, page A-72) to determine ACEC potential, if any; no areas were found to meet ACEC criteria on the basis of habitat protection.

BLM is obligated to apply the least restrictive level of stipulations to oil and gas leases necessary to resolve resource conflicts (76 IBLA 395 (1983)). BLM does not agree that segregating wildlife habitats from mineral development would meet this requirement. BLM cannot simply close SJRA to further leasing pending habitat inventory, as suggested in this comment, without NEPA documentation. This RMP/EIS fulfills the NEPA requirement and does not indicate that a wholesale closure would be necessary.

BLM's reliance on lease stipulations, including no-surface-occupancy, fulfills the agency's obligation under FLPMA and NEPA to mitigate potential adverse impacts to other resources. An oil and gas lease, once issued, is a legal contract between the Federal Government and the lessee. Lease amendments, such as terminating a no-surface-occupancy stipulation as suggested in this comment, cannot be made without agreement of poth parties.

Quite simply, we are opposed to the use of NSO leasing. If resources -- such as critical habitat for Bighorn Sheep -- cannot tolerate development, then no leases should be issued for such lands unless the leases allow only directional drilling. Where directional drilling is not feasible, no leases should be issued. Any changes in the conditions on such leases should be accomplished only through Plan amendment. Otherwise, for the Bureau to assert that critical environmental resources such as wildlife and wildlife habitats can be protected via NSO stipulations is simply a shell game.

Furthermore, the record to date of the Bureau's ability and willingness to enforce stipulations raises serious questions about its ability to manage oil and gas development in the extensive areas opened to leasing by every alternative in the Draft Plan. No data is provided in the draft plan on the type of enforcement program proposed by the Bureau to assure that seasonal restrictions on oil and gas exploratory or other activities are complied with. Does the Bureau have adequate enforcement personnel in the San Juan Resource Area? Does it have funds available to provide for an effective enforcement program? Are the enforcement authorities of the Bureau adequate to ensure that effective action will be taken against lessees who violate the terms

[Comment page 7]

Lease conditons are established through BLM planning documents and cannot be changed outside the planning process, as stated in this comment. Before negotiating lease changes, BLM would have to amend the existing plan, which would require NEPA documentation. By accepting a no surface occupancy lease, an operator agrees not to use the surface of the leasehold. Accordingly, the minerals from that lease can be developed only by directional drilling from an area offlease.

The draft does not state that wildlife resources, such as bighorn sheep, cannot tolerate development; literature cited by BLM does not support this conclusion [King and Workman, 1983]. BLM observes that bighorn show poor tolerance for disturbance during critical periods (draft page 3-41); therefore, the seasonal stipulations proposed in the preferred alternative are believed adequate to protect these animals.

BLM does not agree that the agency has a poor record of enforcing lease stipulations. The draft assumes that funding and personnel will be sufficient to carry out plan decisions, including mineral lease stipulations (draft page 1-2).

Enforcement of lease conditions is part of BLM's ongoing Inspection and Enforcement program, and staffing and funding levels are believed adequate. The RMP provides broad land management decisions; provisions for specific enforcement operations do not fall within the ambit of an RMP.

of their leases? Are the penalties for non-compliance with lease stipulations adequate to deter violations? Nowhere in the Plan is it clear that the Bureau has, or intends to have, a vigorous policing program to assure compliance with the lease stipulations which it uses extensivly to avoid a careful examination of the potential impacts of oil and gas development.

Livestock Grazing

The reported 95% unsatisfactory range condition indicates that the rangelands of the San Juan Resource Area have been scandalously abused for a long time. And, incredibly, despite the fact that 95% of the SJRA rangelands are in unsatisfactory condition, the Preferred alternative proposes not only to continue business-as-usual in terms of numbers of AUMs permitted, but to increase the number of authorized AUMs in the resource area (p.A-193)! We agree with the Utah Division of Wildlife Resources that 95% unsatisfactory range condition is inexcusable, and that the BLM should make immediate, downward adjustments in both livestock use and preferrance.

According to the EIS, 452 miles of the reported 481 miles of riparian areas are in Category "I" allotments (pp. A-109 -

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 8]

Penalties for noncompliance with lease stipulations are based in law (30 U.S.C. 1701) and believed adequate to deter violations. The draft (pages 1-10 and 2-1 and appendix B) states that laws pertaining to public land management will be applied.

Livestock Grazing

The draft does not indicate that 95 percent of the rangeland in SJRA is in unsatisfactory condition, but rather that 95 percent of the area falls within grazing allotments classified as I category (draft page 3-54). Range condition is only one of several criteria that could lead to I category (draft appendix D). Unless based on conflicts with other resources, adjustments in livestock grazing preference could be made only after adequate monitoring, not immediately, as suggested in this comment (draft page 2-6). (Refer also to the responses to comments 30 and 31, State of Utah, Office of the Governor.)

A-120). Yet, livestock grazing is projected to remain at essentially current levels, even under alternative "D" (p. 2-15). Instead, immediate special attention should be devoted to implementing grazing systems or eliminating livestock grazing entirely from all riparian areas in order to restore all riparian ecosystems within the Resource Area to ecological health. If "grazing systems" are implemented instead of livestock removal, such grazing systems should have as their purpose the rapid restoration of healthy riparian ecosystems. Also, all "yearlong habitat", "crucial habitat", and "mesa tops" habitat for bighorn sheep are in category "I" allotments (Figs. 3-11 and 3-15, pp. 3-43 and 3-55). Grazing in these areas should be reduced or eliminated altogether to allow the natural vegetation to come back and improve sheep habitat.

According to the Preferred Alternative (p. 4-66), management to protect primitive and semiprimitive nonmotorized ROS classes will minimize disturbance on large tracts of land with bighorn sheep habitat, thus allowing the population to increase by 150 animals. What specific management actions will take place to accomplish this? What is the timeframe for reaching this goal? On the other hand, however, the EIS states (p. 4-66) that "livestock use would increase somewhat in the crucial habitat areas, which could increase

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[Comment page 9]

Livestock grazing is not projected to remain at current levels under alternative D. The draft indicated that under alternative D livestock grazing would be minimized over the majority of SJRA (page 2-15), that available forage would decrease by 33 percent (page 4-55), and that livestock would be excluded from riparian areas (page A-16).

As mentioned above, livestock adjustments could be made only after adequate monitoring, unless made to resolve conflicts with other resources (draft page 2-6). Under alternative E, grazing would be eliminated on five mesa tops to reduce potential grazing conflicts between bighorn sheep and cattle (draft page A-22). Restoration of riparian areas would be considered and provided for under AMPs developed at the activity plan level (draft page A-29 and appendix U).

Management actions to protect ROS classes are described in draft appendix A. The time frame for implementing RMP decisions is explained in appendix B.

competition for forage on winter range, possibly decreasing bighorn populations." Why is this counterproductive proposal necessary? Additionally, the EIS states (p. 4-67) that range project developments in crucial bighorn sheep habitat would occur "so as not to interfere with the sheep." However, the same paragraph states that "land treatments" would occur on 1000 acres of crucial rutting and lambing habitat causing a loss of habitat and a secondary loss of 10 animals. These actions negate the results of the protective management.

We support the exclusion of livestock from the five Mesa Tops critical sheep habitat areas as recommended on p. 4-66. However, the BLM plans to allow the harvest of woodland products in this area which according to the EIS would reduce the population by 10 sheep. Doesn't this defeat the purpose of excluding livestock?

In summary, despite the draft plan's claim that "The SJRA can produce forage sufficient to meet the demand for full active preference (79,098 AUMs)" (p. 3-57), the fact of the matter is that 95% of the range is in unsatisfactory condition under the present pressure of 55,000 AUMs. It is irrelevant that "grazing use in the SJRA is based on historical use" (p. 3-57). The condition of the range in

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[Comment page 10]

The statement on draft page 4-66 cited in this comment is not a proposal but a potential impact. Grazing use was not restricted throughout the entire crucial beghorn sheep habitat area under alternative E because no conflicts between bighorn and cattle now occur (draft page 3-58); the draft states that bighorn sheep loss from increased grazing use in crucial habitat areas is a possibility, but it was believed to be so remote that no loss numbers from this cause were projected. The text of the draft has been clarified on this point (see revisions to draft page 4-66).

Under alternative E, construction of range projects within crucial habitat areas would not interfere with the sheep because the seasonal restrictions would be imposed (draft page A-21); the draft has been clarified on this point (see revisions to draft page 4-67). Impacts to sheep populations from the construction of range improvements would be assessed in the NEPA document prepared at that time (draft page A-29).

The potential land treatments shown in the draft are not proposed projects but areas physically suitable for land treatments. The draft has been revised to clarify this (see revisions to draft page 2-6 and table 2-7). The draft has been revised to clarify that land treatments would not be considered on the five mesa tops (see revisions to draft figure 2-15). NEPA documentation done at the time a project was proposed would indicate impacts to other resources, including wildlife (draft pages 2-1, A-1, and A-29).

BLM appreciates this comment's support of grazing exclusions on the five mesa tops identified in the draft. Harvest of woodland products would be allowed only in designated areas (draft page 2-5); BLM does not plan to provide areas for harvest of woodland products on the mesa tops if an adverse impact to bighorn sheep populations would result (as determined in the NEPA documentation prepared at the time a project was proposed). The mesa tops are relatively isolated, and little, if any, wood product harvest is expected in this area. The adverse impact to sheep populations from harvest of woodland products was incorrectly stated; the draft has been revised accordingly (see revisions to draft page 4-67).

As stated earlier (see comment page 8), the draft does not indicate that 95 percent of the range is in unsatisfactory condition; changes in stocking levels because of range condition cannot be made prior to monitoring.

the San Juan Resource Area is such that immediate reductions in livestock numbers should be implemented.

Riparian/Aquatic Habitat Management

As in other resource areas, riparian zone/aquatic habitat management should be a high priority management concern of the BLM in the San Juan Resource Area. The scarcity, importance of, high demand for, and poor condition generally of this resource in the SJRA dictates the need for an aggressive restoration and management plan for all riparian ecosystems occuring in the SJRA. While less than 1 percent of the public lands in general (and in the SJRA) administered by the BLM are riparian areas, their use as habitat for wildlife is disproportionate to their occurance. According to the Utah Division of Wildlife Resources, riparian areas within the SJRA constitute 70 percent of its wildlife resources ("Utah Division of Wildlife Resources Comments on Draft San Juan Resource Management Plan and EIS," p. 6). Because BLM's riparian areas exist in the arid and semi-arid regions of the West, such as the SJRA, the water, food, and cover afforded by them are very important habitats for a wide variety of game and non-game avian, aquatic, and terrestrial species. And because of their association with surface and subsurface water, they are generally very responsive to restoration efforts.

[Comment page 11]

Riparian/Aquatic Habitat Management

BLM agrees that riparian areas require special management; the preferred alternative provides special conditions to protect riparian and aquatic areas (draft appendix A).

Unfortunately, there is no evidence in the draft San Juan RMP that the importance of riparian areas is recognized by the BLM. Has the BLM carried out any inventories of the extent and condition of the riparian areas under its management in the SJRA? If not, does it plan to do so? If so, what is the condition of riparian areas which have been surveyed? According to the Utah Division of Wildlife Resources, the 1500 acres of riparian areas identified in Figure 3-12 (p. 3045) "do not reflect that total resource in the SJRA." ("Utah Division of Wildlife Resources Comments on Draft San Juan Resource Management Plan and EIS," p. 4) Is the correct acreage figure 38,400 acres, as stated on p. A-73? As stated above, many of the riparian areas in the San Juan Resource Area are open to oil and gas development and occur in "I" Category grazing allotments. According to the EIS, there apparently are no existing or proposed habitat management plans for the following riparian areas: Alkali Canyon, Comb Wash, Cottonwood Creek, Monument Canyon, and the San Juan River (Fig. 3-13, p. 3-47). Why not?

We support the proposed livestock exclusions from the Upper Indian Creek riparian area (p. 4-68), and from 20 acres of Cajon Pond ACEC in the Preferred Alternative E. However, we urge the BLM to designate all riparian areas not included in

[Comment page 12]

The draft states that riparian areas are important for wildlife and preferred by livestock (draft page 3-49; see also MSA section 4350 Wildlife Habitat Management). Riparian areas are inventoried as part of on-going range studies (draft page 2-8). Approximately half of the riparian acreage in the SJRA has been rated as to ecological condition (draft appendix O); ratings were evenly split between early and mid-seral.

BLM did not receive the comments from UDWR cited here during the comment period for the draft San Juan RMP/EIS (see comments 30 and 31, State of Utah, and the responses, for a discussion of state agency concerns).

The riparian acreage figure on draft page A-73 reflects the figures used in the MSA (draft page A-61, A-73). The MSA used a riparian corridor of 660 feet (draft page A-73), and the draft used a corridor of 25 feet (draft page A-20). After reviewing public comments, the corridor width used in the proposed RMP and final EIS has been changed to 100 feet and the total acreage to 6,000 (see revisions to draft tables S-1, 2-7, 2-10, page 3-49, table 3-6, and chapter 4).

The RMP/EIS identifies areas where HMPs are needed to resolve existing conflicts. Riparian areas were not identified as requiring HMPs, but could be included at a later date if specific needs were identified through a plan amendment process (see draft appendix B).

BLM appreciates this support for livestock exclusions stated in the draft; however, in the proposed RMP, the proposed Cajon Pond ACEC has been absorbed into the proposed Hovenweep ACEC, and livestock exclusions are not a part of the management prescriptions. An interagency review of the upper Indian Creek drainage did not demonstrate the need for livestock exclusions to be made at this time (see revisions to draft page 5-2).

Wilderness Areas within the SJRA as Areas of Critical Environmental Concern, and exclude all livestock, mineral exploration and development activities, and recreational ORV use from them.

Areas of Critical Environmental Concern

According to FLPMA, the BLM is required to "give priority to the designation and protection of areas of critical environmental concern." (43 USC 1712 (c) (3)) ACECs are defined as :

> ...areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards. (43 USC 1702 (a))

The San Juan draft RMP's treatment of ACEC's is extremely confusing. It is virtually impossible to ascertain the reasoning behind decisions to designate or not designate certain areas as ACECs. It is also very difficult to ascertain what type of management prescriptions are proposed ACECs.

To the interested reader, the BLM's decision to analyze only 10 of the 23 potential ACECs identified in the San Juan

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 13]

BLM does not agree that all livestock, mineral, and recreational ORV use should be excluded from riparian areas. The comment does not show that riparian areas meet the criteria of relevance and importance for ACEC designation. Exclusion of livestock from all riparian areas would not be viable because livestock depend upon water for survival.

Areas of Critical Environmental Concern

The draft has been revised to explain the rationale for decisions either to carry prospective ACECs forward or to drop them from further consideration (see revisions to draft appendix H). In general, areas were proposed for ACEC designation where there was a professional consensus that special management was needed to protect relevant, important values at risk. (See also BLM manual section 1617.8.)

Resource Area (Table AH-1, pp. A-62-63) is shrouded in mystery. Of the ten considered, only part of the acreage in 5 of the potential ACECs is recommended for ACEC designation in the preferred alternative.

On p. A-70 the BLM identifies the potential ACEC, Indian Creek Drainage Basin (25,000 acres) as "...important because it provides one of the few trout stream habitats in the region." Yet this area was not considered as an ACEC in the EIS. The Montezuma Creek Drainage (165,000 acres), Comb Wash Sensitive Soils Area (6240 acres), Montezuma Creek/Alkali Canyon Sensitive Soils Area (87,450 acres), and Butler/Cottonwood/Recapture Creeks Sensitive Soils Area (41,050 acres) were identified as potential ACECs based on sensitive soils characteristics and the resulting potential natural hazards. However, none of these areas were recommended for ACEC designation (pp. A-70-71). The Desert Bighorn Sheep Habitat Area (329,000 acres), Dry Valley Antelope Habitat (34,000), Deer Winter Range (197,550 acres), and the Riparian/Aquatic Habitat (38,400 acres) areas all were identified as potential ACECs based on their value and impotance to wildlife, yet they were not recommended in the draft plan as ACECs (pp. A-72-74). With respect to the Dry Valley Antelope Habitat, not even the 12,960 acres identified as "crucial fawning habitat" was

[Comment page 14]

The Indian Creek drainage was considered as a preliminary potential ACEC because of downcutting of soils, not because it supports a trout fishery (draft page A-70).

The preliminary potential ACECs identified in the MSA to protect sensitive soils were not carried forward because application of either existing regulations or the special conditions identified in draft appendix A was believed sufficient to protect the special values and mitigate the natural hazard.

The preliminary potential ACECs identified in the MSA to protect crucial habitat for antelope and bighorn sheep were not carried forward because application of either existing regulations or the seasonal conditions identified in draft appendix A was believed sufficient to protect the animals (draft page A-72). These provisions were thought adequate to protect wildlife from oil and gas development and livestock grazing.

recommended for ACEC designation (p. A-72). The main reason given by the Bureau for the above deletions is that existing management practices are sufficient to protect the natural values in these areas (pp. A-70-74). The problem is that "existing management practices" are not adequate to protect these areas, particularly with regard to oil and gas development and livestock grazing.

We also have problems with the designations of the 5 ACECs in the preferred alternative (discussed in Appendix A, pp. A-23-26 and Appendix I, pp.A-75-88). All five ACECs encompass riparian areas, most of which is in unsatisfactory range condition (comparison of Fig. 3-14, p. 3-55 with Figs. 2-6, p. 2-29 and 3-12, p. 3-45). Yet the BLM proposes to allow the continuance of grazing in all of these areas, except the fenced portion of Cajon Pond ACEC and Dark Canyon ACEC. Also, ORV use is proposed in all of the ACECs except Dark Canyon. This jeopardizes important riparian habitat, and should not be allowed. According to Fig. 3-11, p. 3-43, Grand Gulch ACEC is located in yearlong bighorn sheep habitat, yet grazing and ORV use is proposed in this area. This endangers the sheep using this area. Additionally, NSO leasing will be allowed in all ACECs. As pointed out above NSO stipulations may not be effective as a mitigation measure. Finally, all designated ACEC's should be withdrawn

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 15]

While a comparison of draft figures 2-6 and 3-12 shows that the five potential ACECs under draft alternative E encompass riparian areas, figure 3-14 does not show that the riparian areas are in unsatisfactory range condition (see response to page 8 of this comment). Under draft alternative E, grazing would be excluded from the riparian areas shown in figure 3-12 within all of the potential ACECs except Alkali Ridge and part of Cajon Pond (draft appendix A). (The draft has been revised regarding the Cajon Pond and Grand Gulch ACECs.)

ORV use would be limited to existing roads and trails in riparian areas (draft table 2-8). BLM believes this is the maximum level of ORV management necessary to mitigate adverse impacts.

In the draft (page 3-58), no current conflicts were identified between grazing and bighorn sheep. Under draft alternative E, the potential Grand Gulch ACEC would have ORV use limited to specific roads and trails. No conflicts between ORV use and bighorn sheep were identified outside crucial habitat areas. BLM does not believe that present or projected land uses endanger bighorn sheep in Grand Gulch.

BLM is confident that no-surface-occupancy stipulations on oil and gas leasing would be sufficient to mitigate adverse impacts to surface resources (see response to page 6 of this comment). Withdrawal from mineral entry has been proposed in the preferred alternative where believed to be the minimum required to protect other surface values.

from mineral entry.

Threatened and Endangered Species Management

The draft EIS states that, "No management action will be permitted on public lands that would jeopardize the continued existence of plant or animal species listed as threatened or endangered, or officially proposed for listing" (p. 2-8). This is not good enough.

The Endangered Species Act imposes upon the BLM the mandatory duty to take affirmative action to assist in the recovery of endangered or threatened species to the point where the Act's protection is no longer necessary. This obligation is articulated in a number of sections of the law, the legislative history of the Act, and by the courts. For example:

> The Secretary [of the Interior] shall review other programs administered by him and utilize such programs in furtherance of the purposes of this [Act]. All other Federal agencies shall, in consultation with and with the assistance of the Secretary, utilize their authorities in furtherance of the purposes of this [Act] by carrying out programs for the conservation of endangered and threatened species... (16 USC 1536(a)(1) [emphasis added])
>
> All Federal departments and agencies shall seek to conserve endangered and threatened species and

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 16]

Threatened and Endangered Species Management

Upon review, BLM agrees with the this comment regarding the responsibility to cooperate with USFWS in preparing recovery plans for T/E species. The text of the draft has been revised accordingly (see revisions to draft page 2-8).

> shall utilize their authorities in furtherance of the purposes of this [Act]... (16 USC 1531(c)(1) [emphasis added])

The legislative history of the ESA clarifies the obligation of federal agencies to recover endangered species:

> The ultimate goal of the Endangered Species Act is to focus significant attention on listed species so that, in time, they can be returned to a healthy state and removed from the list. (House Rpt. No. 95-1625, 95th Cong., 2d Sess. 6, reprinted in [1978] 7 U.S. Code Cong. & Ad. News 9456 [emphasis added])

Furthermore, Congress amended the Act in 1978 to add Section 4(f), which reads in part:

> The Secretary... shall develop and implement plans (...referred to as "recovery plans') for the conservation and survival of endangered... and threatened species... (16 USC 1533(f))

To simply promise to not take any action that would further jeopardize the existence of threatened or endangered spcies is clearly not sufficient to meet the law's mandate. Instead, the Bureau should develop and implement recovery plans for all T/E species found within the San Juan Resource Area.

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 17]

It should be understood that the USFWS was given the authority and responsibility to write recovery plans with support from other agencies involved.

Withdrawal Review

This RMP is a classic example of the confusion and misapplication of law which has plagued the Department's Withdrawal Review Program. In Chapter Four (p. 4-71), the Preferred Alternative "E" states the Bureau's intention to execute withdrawals on all lands covered by C&MU classifications, as well as an additional 13,590 acres, in order to preserve the protections afforded these areas under the C&MU Act.[1] Yet in Chapter Two (p. 2-5), the EIS states that withdrawals and C&MU classifications are being reviewed and terminated as part of a separate "withdrawal review process mandated by FLPMA:"

> FLPMA requires the BLM to review agency withdrawals and C&MU classifications. This is done in response to schedules prepared by USO, or upon special BLM or agency request. SJRA will review other agency withdrawals (24,140 acres). After review, withdrawals found to be obsolete will be removed. New withdrawals will be processed upon request from the BLM or other federal agencies, but can be made only by the Secretary or by Congress.
>
> The C&MU classifications will remain in force until either the classification is lifted or the lands are formally withdrawn. Existing land

---

1 However, Table I-2, "Summary of Management Opportunities Identified," (p. I-7) indicates tht no "potential withdrawals or areas not to be withdrawn" are identified in the RMP.

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 18]

Withdrawal Review

Table I-2 indicates that potential withdrawals or areas not to be withdrawn would be identified through the RMP process and states that no opportunity was identified to resolve this situation administratively. The table does not indicate that no potential withdrawals are identified in the RMP, as stated in this comment.

This comment cites draft page 4-71 as stating the intention to execute withdrawals on C&MU classifications. Draft chapter 4 explains impacts that would occur from alternative management actions; different areas were considered for withdrawal under different alternatives. This comment then states that the draft, page 2-5, contains contradictory guidance regarding withdrawal review. BLM does not believe this section conflicts with alternative E; the first part of chapter 2 (cited in this comment) presents management common to all alternatives, including ongoing review programs, that would be conducted in addition to the other management actions described under each alternative (draft page 2-1).

> leases, which have been classified under the R&PP or the Small Tract Acts, will not be affected by the RMP.

In fact, according to the EIS, several recreation areas previously segregated from mining pursuant to C&MU classifications have already been opened in the San Juan Resource Area under the auspices of the "Withdrawal Review Program" (p. 3-87). The alleged authority for these actions is described as follows:

> In 1970 the majority of the public lands in San Juan County were classified under the authority of the Classification and Multiple Use (C&MU) Act. The classification segregated the lands from land and mineral entry which could result in disposal... Under the withdrawal review program enacted with the passage of the FLPMA in 1976, the C&MU classification was removed and most of the lands were opened to the public land laws. (p. 3-97)

This is a serious misstatement of the Bureau's legal obligations under FLPMA with respect to C&MU classifications. FLPMA did not enact a "withdrawal review program" wholly separate from the land use planning requirements of the Act. In fact, Section 202(d) of FLPMA, 43 U.S.C. Section 1712(d), specifically requires that existing land use classifications must be <u>reviewed</u> in the course of developing resource management plans, and can be terminated or modified <u>only</u> if such action would be consistent with the applicable RMP. Consequently, all

[Comment page 19]

Draft chapter 3 explains the current situation in the SJRA. The current situation regarding C&MU classifications is that they were reviewed after passage of FLPMA, and those found to be unnecessary at that time were removed (draft page 3-87; the comment incorrectly cites page 3-97). BLM is now using the RMP process to review the remaining classifications. Because the C&MU act has been repealed, existing classifications made under that act which are unneccessary must be revoked; those which are neccessary must be legitimized through an official withdrawal.

actions taken to date in the San Juan Resource Area to terminate classifications prior to their review within the context of the preparation of the San Juan RMP are improper. All lands for which C&MU classifications were terminated prior to preparation of the San Juan RMP should be identified in this EIS. Further, any existing activities on these lands which are inconsistent with the previous classifications should be identified in the EIS.

Reference in the EIS to the continuing "withdrawal review program" suggests that additional classifications will be terminated outside the context of the development of a land use plan for the SJRA.[2] Any such action is unlawful under FLPMA Section 202. Furthermore, under the Preferred Alternative, the applicable land use plan will recommend the continued segregation of these lands. Therefore, termination of the existing classifications will not be consistent with the provisions of the San Juan RMP.

In addition, the Bureau must comply with the Order entered by the Federal District Court of the District of Columbia on February 10, 1986, in CA No. 85-2238 as follows: the Bureau

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2 Only nine tracts in the Resource Area presently remain classified under the C&MU Act, and are closed to entry under the public land laws and mining laws.

RESPONSE TO COMMENT 3 NATIONAL WILDLIFE FEDERATION

[Comment page 20]

The draft states that under the continuing withdrawal review program, SJRA will continue to review the withdrawals made by other federal agencies (draft page 2-5); specifically DOE research withdrawal and FERC powersite withdrawals (draft page 3-87). These can be removed only at the request of the other agency involved, not through the BLM planning process. Accordingly, these are addressed through management common to all alternatives, not resolution through the plan alternatives.

BLM is aware of the Federal District Court Order referenced in this comment. This order applies to implementation of planning decisions, not to preparation of a plan. The RMP itself does not serve to revoke, terminate, or apply withdrawals; rather it identifies where these types of actions are recommended to take place.

may not revoke, terminate, or otherwise modify withdrawals; nor may it take any action inconsistent with the specific restrictions of a withdrawal or classification in effect on January 1, 1981, including but not limited to the issuance of leases, the sale, exchange, or disposal of land or interest in land, the granting of rights-of-way, or the approval of any plan of operations. This includes all those lands identified as having had their classifications terminated under the "Withdrawal Review Program" prior to their review under the San Juan resource managment planning process.

Wilderness Management

We recommend the following WSAs and ISAs be designated as wilderness: the Grand Gulch complex including Pine Canyon, Bullet Canyon, Slickhorn Canyon, and Sheiks Flat (105,520 acres), Indian Creek (6870 acres), Dark Canyon (62,040 acres), Mancos Mesa (51,440 acres), Cheesebox Canyon (15,410 acres), Road Canyon (52,420 acres), Fish Creek (46,440) and Butler Wash (22,030 acres). Wilderness management of Grand Gulch, Indian Creek, Dark Canyon, Mancos Mesa, and Cheesebox Canyon among other things will help assure the maintenance of healthy bighorn sheep habitat and populations in these areas. The remoteness and unroaded character of the other

[Comment page 21]

Wilderness Management

The determination as to whether a WSA or ISA is suitable for wilderness designation was not considered in the draft (page 1-10). Suitability of WSAs and ISAs in Utah for designation as wilderness was considered in the statewide wilderness EIS [BLM, 1986] (draft page 1-3).

WSAs, or their proximity to wilderness or defacto wilderness areas managed by other agencies, make them excellent candidates for inclusion in the Wilderness System.

Other Concerns

High uranium potential exists in the following riparian and T/E habitat and sensitive soils areas: Alkali Canyon, Comb Wash, Cottonwood Creek, and Monument Canyon. This conflict is not specificly addressed. (Fig. 3-7, p. 3-25.)

Coal fields in the SJRA coincide with riparian and sensitive soils areas in East Canyon Wash, Comb Wash, Cottonwood Creek, Alkali Canyon, and Monument Canyon (Fig. 3-4, p.3-15). Even though the BLM projects (pp. 3-10, 3-17, 4-8) that the potential is not great enough to attract any real interest, why not withdraw the land from coal leasing now? The coal potential is low, critical riparian habitat areas would be protected, and this would eliminate coal exploration which would harm habitat.

This concludes our comments on the draft San Juan RMP/EIS.

[Comment page 22]

Other Concerns

The RMP can impose only limited restrictions on mining activities (draft page 2-30). BLM operates under many laws pertaining to public resource management, and it is assumed that the RMP would be in accordance with all laws (draft page 1-10). Special conditions regarding riparian habitat and sensitive soils (draft appendix A) can be applied to mining operations performed under a plan of operations (draft page 2-3), so long as rights under the mining laws are not curtailed (draft pages 3-21, 4-10, 4-64, and A-1).

The areas mentioned in this comment do not constitute known T/E species habitat. T/E species will be managed in accordance with law (draft pages 2-8, 3-52, 4-13, 4-15, 4-66, and 4-67). Prior to starting a project, a site-specific clearance is conducted within the vicinity of known habitat to ensure the species is not adversely impacted.

Coal within SJRA cannot be leased prior to completion of an unsuitability study (draft page 2-2). BLM is obligated to apply the least restrictive level stipulations to mineral leases necessary to resolve resource conflicts (76 IBLA 395 (1983)). BLM has no data to support this comment's suggestion that withdrawing SJRA from coal leasing is necessary to protect riparian habitat and sensitive soils from the effects of coal exploration.

If coal exploration should occur before leases are issued, riparian habitats and sensitive soils would be protected under the special conditions presented in draft appendix A. Areas underlain by coal are coincidentally areas of high interest for oil and gas exploration; the impacts of coal exploration are considered to be insignificant in comparison.

Change to the EIS? Yes.

COMMENT 4

The Nature Conservancy

Utah Public Lands Protection Planning
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September 8, 1986

Mr. Ed Scherick
San Juan Resource Area Manager
USDI Bureau of Land Management
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Dear Mr. Scherick:

Thank you for this opportunity to comment on the Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) for the San Juan Resource Area (SJRA). I found this document to be very thorough, readable and well-written. I appreciate this chance to be involved in the planning that will guide the future direction of the Resource Area.

As a preface to my comments, let me explain briefly what The Nature Conservancy does. The Conservancy is a non-profit conservation organization dedicated to maintaining natural biological diversity. This means that we identify and seek protection for examples of the full array of ecosystems and species in the natural world. We focus our resources on those parts or "elements" of the natural world that are the most scarce: rare plant and animal species, rare communities, and undisturbed examples of common communities.

Conservancy scientists have summarized the best information available on the locations of Utah's rare species and communities. Based on this information, one of my responsibilities is to work with the Bureau of Land Management (BLM) to assure the maintenance of certain rare species and natural areas on public lands in Utah. One of the most important means of doing this is as a participant in the RMP process, because decisions that affect rare species and natural areas will be made through that process.

Therefore, my comments in the remainder of this letter will deal specifically with the Conservancy's two main topics of interest with regard to the SJRA Resource Management Plan: 1) Endangered, Threatened and Sensitive plant and animal species, and 2) protection of certain areas that have natural and scientific values.

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RESPONSE TO COMMENT 4

THE NATURE CONSERVANCY

[Comment page 1]

BLM appreciates this support for the draft.

Mr. Ed Scherick
September 8, 1986
p. 2

Endangered, Threatened and Sensitive Species

My comments concerning Endangered, Threatened and Sensitive species in the SJRA are divided into three major subtopics: 1) identity and locations, 2) policy, and 3) management and impacts.

Identity and Locations

The draft RMP/EIS lists five Sensitive plant species that occur in the SJRA (page 3-37). I would like to call your attention to several changes in this list that I believe should be incorporated in the final RMP/EIS.

Two species can probably be deleted from this list. *Astragalus monumentalis* and *Eriogonum clavellatum* are now within Category 3C (taxa no longer being considered for listing as Endangered or Threatened), as published in the September 27, 1985 *Federal Register*.

Two plants should be added to the list. *Echinocereus triglochidiatus* var. *inermis* (spineless hedgehog cactus) is an Endangered plant that was found to occur on Bridger Jack Mesa in 1984. *Dalea flavescens* var. *epica* (Hole-in-the-Rock prairie clover) is a Category 2 taxon that occurs on BLM-administered land in T39S R13E (SLM).

Three other rare plant species are located within the boundary of the SJRA, but so far are not known to occur on BLM-administered land. These are *Asclepias cutleri*, *Cymopterus beckii* and *Penstemon navahoa* (all Category 2). In addition, a newly-described species of milkvetch, *Astragalus piscatior* Barneby & Welsh (*Great Basin Naturalist* 45:551-552) occurs at several locations in Canyonlands National Park to the east of the Colorado River; it is too new to have been categorized by the U.S. Fish and Wildlife Service. I would recommend that you watch for these four plant species, particularly the *Asclepias* and *Astragalus*, when conducting clearances for certain site-specific projects.

Recommended actions concerning the Endangered and Sensitive plant species list for the SJRA are summarized in the table at the top of the next page.

The draft RMP/EIS lists six Endangered and one Sensitive animal species in or with potential habitat in the SJRA (page 3-52). The Nature Conservancy also considers these to be animals whose total numbers, distribution, or population trends raise concern for their long term survival in Utah. The four endemic fish species historically found in the San Juan River (two recently reported) are of especially high priority.

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RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 2]

Endangered, Threatened, and Sensitive Species

Identity and locations. Page 3-37. The text of the draft has been revised to accommodate the suggestion regarding plant species listings (see revisions to draft page 3-37).

Mr. Ed Scherick
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Recommended Actions, SJRA Endangered and Sensitive Plant Species List

Plant Taxon	FWS Status	Official SJRA List retain	delete	add	Watch List
Astragalus cronquistii	Category 2	x			
Erigeron kachinensis	Category 2	x			
Eriogonum humivagans	Category 2	x			
Astragalus monumentalis	Category 3C		x		
Eriogonum clavellatum	Category 3C		x		
Dalea flavescens var. epica	Category 2			x	
Echinocereus triglochidiatus var. inermis	Endangered			x	
Asclepias cutleri	Category 2				x
Astragalus piscatior	--				x
Cymopterus beckii	Category 2				x
Penstemon navahoa	Category 2				x

Policy

It is important that the RMP/EIS make specific mention of BLM policy concerning protection of Endangered, Threatened and Sensitive plants and animals in the SJRA. Such a statement appears in the section on Management Common to All Alternatives, on page 2-8:

"No management action will be permitted on public lands that would jeopardize the continued existence of plant or animal species listed as threatened or endangered, or officially proposed for listing."

I am concerned that this particular wording may not be comprehensive enough. The above statement applies protection only to species that are already listed or officially proposed for listing as T or E. As I understand BLM policy, the Bureau gives Sensitive species the same protection as T and E species, with Sensitive species being those that are officially proposed and those that are candidates for listing (i.e. USFWS Categories 1 and 2). There is a difference between being a candidate for listing (USFWS Categories 1 and 2) and being "officially proposed" for listing (listing package, Federal Register notice, etc.). The following wording would seem to be more in accord with BLM policy:

"No management action will be permitted on public lands that would jeopardize the continued existence of plant or animal species that are listed, are officially proposed for listing, or are candidates for listing as threatened or endangered."

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RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 3]

Policy. Page 2-8. The text of the draft has been revised to accommodate the suggestion regarding State listings of sensitive species (see revisions to draft page 2-8).

Mr. Ed Scherick
September 8, 1986
p. 4

Given the BLM's stated commitment to the continued existence of rare species, I attempted to assess how the alternative management plans (as outlined in the draft EIS) provide for protection of the Endangered and Sensitive plants and animals in the SJRA.

Management and Impacts

General management objectives show that Alternatives D and E would provide the best situations for rare species (i.e. population increases for both plants and animals, where opportunities exist) beyond the basic protection required by law and policy (page 2-58). On these grounds the Conservancy is willing to support Alternative E as the eventual Resource Management Plan. But it is necessary to look more closely at how this (and the other) Alternative(s) address the specific needs of the rare plant and animal species in the SJRA.

As stated at appropriate places in Chapter 4 of the draft RMP/EIS, impacts to sensitive and T/E plants are the same for all Alternatives. This statement of impacts is made under Alternative A, on page 4-13:

"It is assumed that habitats for T/E and sensitive plant species would be protected on a case-by-case basis as provided by law. Therefore there would be no impact to T/E [plant] species."

This assumption of no-impact seems to be based on two underlying assumptions. These underlying assumptions, with accompanying discussion, are as follows:

Assumption #1: The SJRA will periodically update and maintain the most current list of rare plant locations.

This will involve an ongoing program of inventories to determine and map the presence and extent of rare species populations and habitats. It would also involve contact with other institutions, such as The Nature Conservancy and Brigham Young University, that maintain rare plant data bases for Utah. I would urge that the SJRA follow through on conducting such inventories, as stated on page I-9 of the draft RMP/EIS.

Assumption #2: Potential adverse impacts to rare plants are associated with site-specific projects over which the BLM has control.

Case-by-case project clearances can be done, and adverse impact to rare plants avoided, for a number of resource uses over which the BLM has primary control. Such uses include geophysical exploration for oil and gas, permits to drill for oil and gas, extraction of mineral materials, alignment of transportation routes and utility lines, vegetation treatments (chainings/seedings), commercial forest product harvest, and

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RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 4]

Management and Impacts. BLM appreciates this support of the preferred alternative. As noted, data collection, inventories, and monitoring are ongoing. (See also the response to comment 27, from U.S. Fish and Wildlife Service, on this topic.) BLM has authority under the Endangered Species Act to protect threatened, endangered, and sensitive species from adverse impacts; the EIS cannot predict or assess impacts from unauthorized or illegal uses of public resources (draft page 1-10).

Although the RMP may indicate probable development in an area with threatened, endangered, or sensitive species, the draft indicates that specific actions that would jeopardize these species will be denied (draft page 2-8). Wording has been added to appendix Q to clarify that lands disposal of threatened, endangered, or sensitive species habitat would not occur unless the species would benefit (see revisions to draft page A-125).

disposal of public land. Implementation and monitoring of case-by-case rare plant protection appears to be provided for in Appendix B (page A-37).

However, certain resource uses controlled by the BLM do not require site-specific clearances. These are essentially "non-point", extensive activities; the most notable are domestic livestock grazing and ORV activity. Of these two, grazing would probably have the greater effect on rare plant species in the SJRA. Effects of grazing on rare plants are not necessarily negative. There are instances where grazing can assist survival of rare plants by reducing competition from vigorous, common native species. There are also instances where grazing is very harmful, especially if the species of concern is highly palatable.

There is a great need to monitor the effects of such "non-point" resource uses on the populations of rare plants in the SJRA. It is important to know the effects of such uses on rare plants, so that management actions can be adjusted to avoid adverse impact to these species. For example, there are several measures that can be taken to avoid adverse grazing impacts, if any are found, short of excluding grazing altogether. Also, if ORV use is found to be damaging rare plants, then ORV designations can be changed or emergency closures invoked.

Monitoring the effects of grazing or ORV use on rare plants may involve more than what is provided for on page A-37 of the draft RMP/EIS. It would involve establishing study plots at known rare plant locations so that trends in population parameters can be checked over time.

Perhaps this type of monitoring could be conducted within the framework of Allotment Management Plans. To the best of our knowledge, allotments in the SJRA that contain rare plant species are as follows:

Allotment	Endangered/Sensitive Species	Category	AMP
Indian Creek	Echinocereus triglochidiatus var. inermis Erigeron kachinensis	I	Existing, not approved
Lake Canyon	Dalea flavescens var. epica	I	Existing, not operative
Perkins Brothers	Astragalus cronquistii	I	None
Texas-Muley or Slickhorn	Erigeron kachinensis	I	None

[Eriogonum humivagans occurs in an isolated BLM tract toward the Colorado border, apparently unallotted but probably grazed.]

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RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 5]

The draft indicates that actions would not be permitted to occur that would jeopardize threatened, endangered, or sensitive species (see draft page 2-8, revised as noted above). BLM does have the authority to regulate the "non-point" sources of impacts noted in this comment. The RMP will make designations to limit or close areas to ORV use, if necessary for resource protection; additionally, emergency ORV closures can be made (draft appendix E). The RMP will also serve as a guide for activity level planning (such as AMPs) where specific uses (such as grazing) could be limited in an area if necessary for protection of threatened, endangered, or sensitive species.

Known locations of plants on the September 27, 1985 USFWS list referenced in this comment will be monitored regularly (draft appendix B). BLM appreciates this commentor's sharing information on known locations.

Mr. Ed Scherick
September 8, 1986
p. 6

According to Appendix U of the draft RMP/EIS, the above allotments would be scheduled to have AMP's revised or prepared under all Alternatives except A. Sensitive species maintenance could be included as an objective in these AMP's, and in AMP's prepared for other allotments that are found to contain rare plants.

Finally with regard to rare plant species, several known rare-plant locations are subject to potential impacts as identified in the draft RMP/EIS. These potential impacts are as follows:

* Dalea flavescens var. epica occurs within a favorable mineral materials area -- a potential investigation area with high to moderate favorability for development -- in T39S R13E (page 3-19).

* Astragalus cronquistii occurs near or in a potential investigation area for mineral materials with high to moderate favorability for development in T40S R20E (page 3-19). This location is also apparently within a major transportation and utility right-of-way (page 3-85).

* Eriogonum humivagans occurs in one of the isolated tracts toward the Colorado border that has been identified as suitable for disposal in Alternatives A, C, D and E (Appendix Q). This is documented in the "FWS 1983" reference cited on page B-19 of the draft RMP/EIS. This particular tract needs to be retained in public ownership.

The draft RMP/EIS treats the protection of Endangered/Sensitive animal habitat much the same way it treats protection of rare plants -- by assuming that rare animal habitat will be protected on a case-by-case basis as provided by law, so that there would be no adverse impact to these species (page 4-14).

This approach seems valid for protection of known bald eagle habitat. Further, Alternative E contains some more-specific measures that apply to bald eagle habitat:

* A modest increase in riparian/aquatic habitat would occur (pages 4-67, 68), although not all of this increase is in areas where eagles have been seen.

* Moderately restrictive management will be applied to areas with known eagle habitat, such as no surface occupancy along the San Juan River and limited surface use along portions of Cottonwood Wash and Montezuma Creek (page 5-11). I presume that the projected NSO area along the San Juan River does coincide with eagle habitat area, which is apparently not the case under current management (page 3-52).

(p. 7)

RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 6]

All surface-disturbing activities within the range of the known locations will be checked for the actual presence of the species prior to the approval (or onset) of the activity. AMPs or revisions prepared for these areas will consider known locations when planning for range project construction, modification of grazing, or other management measures. The AMPs may include study plots or other means to monitor population trends, or monitoring actions could take place outside of an AMP. The RMP is not intended to provide activity planning or recovery plans; however, BLM will work with other agencies as needed to determine if a recovery plan or special actions are required to protect any listed species. The text of the EIS has been revised to discuss coordination with the USFWS on recovery plans (see revisions to draft page 2-8). (See also response to comment 3, from the National Wildlife Federation, on this topic.)

BLM will manage threatened, endangered, or sensitive animal species as discussed above for plant species. BLM will work with other agencies as needed to inventory, manage, and where appropriate, provide recovery plans for threatened, endangered, or sensitive wildlife species.

This comment correctly assumes that, under the preferred alternative, the area along the San Juan River with no-surface-occupancy restrictions does coincide with bald eagle habitat in the area. The current oil and gas leasing categories along the San Juan were mapped along an old river channel, and part of the eagle habitat was not protected as intended. However, the revised restrictions would apply only to new leases; existing leases would continue under the original terms and conditions until they expire or terminate.

Mr. Ed Scherick
September 8, 1986
p. 7

It is difficult to gauge the effects of alternative management strategies on the endemic fish habitat in the San Juan River, particularly because the SJRA does not have sole control over what happens to this habitat. Apparently the trends of stabilized flow levels and increased water quality will continue, both of which are detrimental to the endemic fish (page 3-53). About all that can be recommended is that the SJRA cooperate with efforts to protect and recover these populations, and not contribute to their decline.

The Nature Conservancy is very concerned with the maintenance of rare plants and animals in the SJRA. Beyond my written comments in this part of the letter, the Conservancy is also willing to work actively with the San Juan Resource Area toward the goal of rare species conservation. Such cooperative work could include information-sharing and actual field assistance -- as you require and as our resources allow.

Natural Areas

The Conservancy's interest in protection of natural areas centers primarily on those sites with relict or near-relict vegetation. We are most interested in the proposed Bridger Jack Mesa and Lavender Mesa Research Natural Areas (RNA's). Although the other areas proposed for special designation have obvious cultural, recreational, wildlife and scenic values, my comments will not focus on them.

I strongly endorse the proposal to designate the Bridger Jack Mesa and Lavender Mesa RNA's as provided in Alternative E. It is to your credit that you recognize and seek to protect the values of these areas. They are excellent locations to study common woodland and shrubland communities that have never been grazed (Lavender) and that are recovering from light grazing (Bridger Jack). The RNA title seems to reflect the scientific basis for these special designations more accurately than the ACEC title (as in Alternative C).

The proposed management of these two mesas as outlined under Alternative E (pages A-21, A-77/78) provides comprehensive protection for them in addition to the RNA title. These measures are very important in order to maintain the integrity of these areas for long-term scientific research. I would like to comment on several of these management prescriptions:

* I would hope that surface disturbance from valid existing rights is minimal. The requirement to use local, native species for revegetation (page A-77) is good. Although exotic plant species do occur on Bridger Jack Mesa (e.g. local abundance of cheatgrass), they are not a major component of the flora. Additional, purposeful introduction of exotics would be detrimental.

(p. 8)

RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 7]

Natural Areas

BLM appreciates this support for designation of Bridger Jack and Lavender Mesas as RNAs. In the proposed RMP, because of a shift in BLM policy, the areas would be designated as ACECs rather than RNAs. (See revisions to draft table 2-7, page 2-68, and appendix H.) However, management goals would be the same as indicated in the draft for the RNAs identified under the preferred alternative.

Mr. Ed Scherick
September 8, 1986
p. 8

* It is good that exclusion from livestock use applies to grazing by pack animals used for access (page A-78). Pack stock grazing could have locally significant impact on Bridger Jack Mesa, especially if there is an increase in recreational as well as scientific use.

* Certain types of nutrient studies could be adversely affected if dead wood for campfires is unknowingly gathered from study plots. The chances of this happening are probably small. However, potential problems could be avoided by requiring fuel-burning stoves only. This requirement would also check the proliferation of fire rings, especially if recreational use increases.

* The previous two points allude to increased recreational use. The draft RMP/EIS mentions on page 4-47 that publicity (whether purposeful or not) following designation could increase public awareness and visitation of special designation areas. Because increased recreational use could be detrimental to the two RNA's, I would recommend that they not be widely publicized outside the scientific community. Though recreational use cannot be excluded, it would be unwise to encourage such use of the RNA tracts. It is good that the draft RMP/EIS allows for limiting recreational use through a permit system if such use is found to be causing adverse impacts (page A-21). Some type of monitoring system and criteria will have to be developed in order to implement this policy.

* The preparation of management plans for the two RNA's is called for on page A-35. Appendices A, H and I already provide a good framework for such plans. More specific requirements, such as the recreation monitoring system mentioned above, would not be hard to incorporate. The Nature Conservancy is willing to assist in developing or reviewing management plans for the Bridger Jack Mesa and Lavender Mesa RNA's after they are designated.

I would also like to comment on several other statements made about the proposed RNA's in the draft RMP/EIS.

The section on economic impacts to livestock operations under Alternative E (page 4-72) states that exclusion of grazing from relict study areas (the RNA's) contributes to a loss of AUM's. I believe that this statement is incorrect, as shown elsewhere in the draft RMP/EIS:

* Bridger Jack Mesa is presently ungrazed (page 2-79), and has not been grazed since 1957 except for trespass horse use in the winter of 1972-73 (page 3-38). Lavender Mesa is inaccessible to livestock.

* No mention is made of relict vegetation study areas in figuring AUM gains and losses for Alternative E on page A-193.

(p. 9)

RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 8]

The two ACECs will be monitored to see if the objectives of protective management are being met (see draft appendix B). If use of dead wood for campfires becomes a problem, a stipulation for use of fuel-burning stoves could be required. Recreational use of the two mesa tops is expected to remain slight (draft page 4-74). BLM agrees that a substantial increase in recreational use could be detrimental to protection of the relict plant communities; again, recreational use could be limited if continued monitoring indicates a need. BLM appreciates this offer to assist in development of activity plans for these areas.

Page 4-72. The statement that exclusion of grazing from relict study areas could cause an adverse impact to livestock grazing was incorrect and has been deleted from the draft text (see revisions to draft page 4-72). The ensuing economic analysis did not project a loss from not grazing Bridger Jack and Lavender Mesa tops.

I raise this point because the loss of AUM's can be a very sensitive issue, and this type of conflict should not be incorrectly associated with designation of these RNA's.

The section on impacts to oil and gas under Alternative E (page 4-62) states that no-surface-occupancy stipulations to protect RNA's would contribute to adverse impacts on oil and gas production. It is true that NSO restrictions would increase costs of exploration and production. However, it seems that the cost of access onto these mesa tops would also be fairly high. I am wondering if the statement on page 4-44 would apply to Bridger Jack and Lavender Mesas:

"The no surface occupancy stipulation would not affect exploration costs in areas where access is poor and special techniques such as directional drilling would be used regardless of management."

Because oil and gas leases are defined by land lines, almost all of the leases that cover the two mesas contain land below the mesa tops. In order to protect RNA values, it is only necessary to apply the NSO restriction to the mesa tops. Portions of leases below the mesa tops need not be so restricted.

Finally, I would like to call attention to a couple of omissions from Table 2-9:

1. On page 2-87, the two RNA's should appear under the heading of Limitations on Surface Disturbance for Alternative B. I believe that this is the intent of management prescriptions as outlined on pages A-7 and A-75/76.

2. On page 2-89, the requirement of native seed mixes in the RNA's should be included under the heading of Reclamation Following Surface Disturbance for Alternative B. This is called for in the management prescription on page A-76.

* * *

Overall, Alternative E is a good compromise that we support as a Resource Management Plan, with just four additional recommendations for the Proposed RMP/Final EIS:

1. Incorporate the recommended changes to the SJRA Endangered/Sensitive plant list as shown on the top of page 3 of this letter. This would include an unofficial "watch list" of four species that occur within the boundary of the SJRA, but so far have not been found on public land.

(p. 10)

[Comment page 9]

Page 4-62. This point is well taken regarding the application of stipulations to an irregular area, such as a mesa top. However, for ease of interpretation and management, stipulations or special conditions of use will be applied using land lines (aliquot parts). (See the map that accompanies this proposed RMP.) This occasionally results in restrictions on some additional lands, but the overall effect is negligible.

Table 2-9. The text of the EIS has been revised to accommodate the suggestions regarding treatment of the RNAs under Alternative B (see revisions to draft pages 2-87 and 2-88).

Alternative E

BLM appreciates this support of the preferred alternative. The text of the draft has been revised to include the species noted (see revisions to draft page 3-37).

Mr. Ed Scherick
September 8, 1986
p. 10

2. Revise the policy statement on rare species so that there is no doubt about its including taxa that are candidates for listing (USFWS Categories 1 and 2), as suggested on page 3 of this letter.

3. Monitor the effects of "non-point" resource use, particularly grazing and ORV use, on the rare plants in the SJRA. This could be done directly within the Endangered Species program, or within the framework of AMP's.

4. Consider the possibility of prohibiting the gathering of dead wood for campfires in the RNA's.

In conclusion, thank you for considering these comments in developing the SJRA Resource Management Plan. I have appreciated the interest and support that I received when visiting the Area Office in Monticello, and when talking with Area staff on other occasions. I look forward to continuing a good working relationship between The Nature Conservancy and the San Juan Resource Area.

Sincerely yours,

Joel S. Tuhy

Joel S. Tuhy
Utah Public Lands Coordinator

RESPONSE TO COMMENT 4 THE NATURE CONSERVANCY

[Comment page 10]

The text of the draft has been revised to include the suggested policy wording (see revisions to draft page 2-8).

Monitoring the effects of "non-point" activities would be a part of activity planning, as discussed earlier.

Prohibiting the gathering of dead wood within the Bridger Jack and Lavender Mesa ACECs may be considered in the future, if the need arises, as discussed above.

Change to the EIS? Yes.

COMMENT 5

Alice I. Frall
Lands Director

RECEIVED
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Rocky Mountain
Oil & Gas Association, Inc.

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303/534-8261

July 28, 1986

Mr. Ed Scherick
Area Manager
San Juan Resource Area
Bureau of Land Management
P. O. Box 7
Monticello, UT 84535

Dear Mr. Scherick:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I am writing to comment on the San Juan Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS). RMOGA is a trade association comprised of hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain west.

RMOGA would like to take this opportunity to compliment the San Juan Resource Area planning team on a comprehensive, well-compiled Draft. We appreciate the care in terms of documentation that has been afforded energy and mineral resources.

There are several points we would like to make regarding management decisions the BLM has made which affect subsurface resources and their associated uses.

First, it is our opinion that the unequivocal placement of primitive recreation lands in leasing Category 2 is unnecessary. The industry has proven on numerous occasions that oil and gas activities can be mitigated in such a way that adverse impacts on recreational uses would be negligible. We believe that these stipulations should be applied only on a case-by-case basis. Those areas with high potential for oil and gas should be required to meet performance standards rather than application of blanket no surface occupancy stipulations. It is entirely possible that an operator could conduct his activities in a manner which would be deemed acceptable. Since there is no apparent direction contained in the plan which specifies that these conditions could be waived under appropriate stipulations, we encourage the BLM to include such direction in the final plan and EIS.

RESPONSE TO COMMENT 5 ROCKY MOUNTAIN OIL AND GAS ASSOCIATION

[Comment page 1]

BLM recognizes that the oil and gas industry, as a whole, has demonstrated the ability to develop leases in a manner compatible with many recreational pursuits, and with related aesthetic values. However, the P ROS class is meant to provide a recreational setting that is an unmodified natural environment. It is BLM's judgment that drilling equipment, development activities, or possible production facilities would not be compatible with the P class.

Under the five alternatives presented, the draft analyzed the impacts to different environmental components that would be expected to occur under different levels of surface management. The difference between "no lease," "no surface occupancy," and lease development were discussed at length (see draft chapter 4 and appendix S). The adverse impacts (including economic) to a lessee which might result from loss of surface use represent a compromise between use of the surface and use of the subsurface and were believed to be slight.

July 28, 1986

Mr. Ed Scherick
Area Manager
San Juan Resource Area
Bureau of Land Management

page two

Second, while we support the elimination of "no lease" areas, this decision hardly represents a boon to the oil and gas industry because most of these newly leasable lands are placed in Category 2. We believe the BLM should make a concerted effort to grant access to those lands with significant potential for oil and gas. Oil and gas activities provide a major employment base as well as providing sorely needed revenues to state and local governments.

We take issue with the BLM's statement on Page 4-67, "Even with seasonal conditions, geophysical activities would disturb 3,495 acres of crucial habitat by (the year) 2000, resulting in a loss of 350 deer; oil and gas development activities would disturb an additional 1,470 acres, resulting in a loss of an additional 147 deer by 2000, for a total loss of about 497 deer". During a recent tour conducted by RMOGA for top level officials of the Forest Service, a seismic demonstration was performed. It was extremely interesting, and indeed enlightening, to observe a doe browsing within the immediate vicinity where the seismic shots were detonated. Since the deer did not even vacate the premises, there was a strong indication that there were no adverse impacts to the deer resulting from the seismic blasts. Furthermore, that the acreage needed for roads in and of itself would cause the direct deaths of 147 deer is absurd. Wildlife species have proven to be quite flexible in their habits, and the brief loss of minimal acreage due to new road building would hardly cause such an impact.

In conclusion, we support the adoption of Alternative B because it affords maximum opportunities to explore for and develop oil and gas resources. The BLM has indicated that much of the Resource Area has unknown potential for oil and gas, and Alternative B would provide the necessary access to explore these areas in order to determine the actual potential. It is possible that we could support Alternative E if the BLM were to incorporate more of the management goals relating to oil and gas included in Alternative B. However, at this time we find it impossible to support Alternative E because it unduly restricts oil and gas activities, and, in our opinion, requires major revisions.

Thank you for the opportunity to provide our comments. Please do not hesitate to contact me if you would like to discuss our comments in further detail.

Sincerely,

Alice I. Frell
Public Lands Director

AIF:cw

RESPONSE TO COMMENT 5 ROCKY MOUNTAIN OIL AND GAS ASSOCIATION

[Comment page 2]

The impact to wildlife from geophysical work, stated as a loss under alternative E (see draft page 4-67 and the analysis assumptions on page 4-61), would come from a change in the habitat, not a direct loss (death) caused by seismic activities. Even though geophysical work is temporary, BLM estimates that between 25 and 30 percent of geophysical trails have continuing year-round vehicular use, which would result in increased disturbance to deer and permanent habitat removal. Based on this comment, the wildlife impact numbers have been reviewed and revised (see revisions to draft chapter 4).

The objectives of alternative B, which the commentor prefers, specifically included maximizing the area available to oil and gas lease development. However, maximizing access to areas of unknown oil and gas potential would be counter to the objectives of the preferred alternative. Please also note that the completed RMP will be reviewed at periodic intervals (see draft appendix B); if the effect of limiting areas to no surface occupancy proves to have a greater impact than now projected, the oil and gas leasing categories could be adjusted in the future.

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Change to the EIS? Yes.

COMMENT 6

Sierra Club
Cache Group
Post Office Box 3580 • Logan, Utah 84321

November 1, 1986

Ed Scherick, Area Manager
San Juan Resource Area
U.S. Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

Subject: Draft Resource Management Plan EIS

Dear Mr. Scherick:

The Cache Group of the Utah Chapter of the Sierra Club is pleased to present the attached comments concerning the San Juan Resource Area Draft Management Plan Environmental Impact Statement. Our comments are based on our review of the draft document and numerous visits by our members to the San Juan Resource Area. This document represents the views of our 127 members in Cache and Rich counties, Utah.

This letter and the document should be entered as a part of the public record which closes on Nov. 3, 1986. When the final RMP is released, we would appreciate one copy.

Similarly, the Cache Group would like to receive other BLM documents related to land use issues in the San Juan Resource Area as they are made available.

Sincerely,

Rudy Lukez, chair

(w) 801/863-3702
(h) 801/753-5568

To explore, enjoy and protect our nation's swamps and meadows, rivers and mountains, deserts and prairies.

RESPONSE TO COMMENT 6

SIERRA CLUB, CACHE GROUP

[Comment cover letter]

BLM appreciates the group's review of the draft.

Written Response

from the

Cache Group
of the Utah Chapter of the Sierra Club

regarding the

Draft San Juan Resource Management Plan
from the U.S. Bureau of Land Management

presented

November 1, 1986

Cache Group Sierra Club
P.O. Box 3580
Logan, UT 84321

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Cache Group Sierra Club Comments on Draft San Juan RMP EIS 1986

Section 1.0
Introduction

In response to the Bureau of Land Management's San Juan Draft Resource Management Plan Environmental Impact Statement (RMP/EIS) as issued in May, 1986, the Cache Group of the Utah Chapter of the Sierra Club is presenting the following written comments.

This document represents the Cache Group's[1] official position and it is based on an extensive review of the draft RMP/EIS, information obtained during research on the recent BLM Statewide Wilderness Draft Environmental Impact Statement for Utah, and comments from Cache Group members concerning their experiences in the San Juan Resource Area.

Section 2.0
Summary

There is no specific alternative supported by the Cache Group. Our review of the five alternatives presented by the BLM concluded that none were acceptable to our organization. If one alternative must be chosen, then the Cache Group supports "Alternative D" instead of the BLM selected "Alternative E." A combination of "Alternative C" and "Alternative D" would be even better, but still not representative of our concerns.

Within the five alternatives, we support three goals in Alternative D, one goal in Alternative C and one goal in Alternative E as follows:

- preservation of natural succession of plant communities (Alternative D)
- protection of cultural resources beyond the law (Alternative D)
- increase areas available for primitive recreation (Alternative D)
- preservation of watershed values (Alternative C)
- protection of wildlife habitats (Alternative E)

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[1] For simplicity throughout the remainder of this document, "Cache Group" shall refer to "Cache Group of the Utah Chapter of the Sierra Club."

RESPONSE TO COMMENT 6 SIERRA CLUB, CACHE GROUP

[Comment page 1]

Section 2.0. BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

It should be recognized that the goals listed in this comment are not entirely compatible, and that the goals listed in the draft for the preferred alternative do not necessarily exclude the goals listed in this comment (draft page 2-15). For example, preservation of natural plant succession (under draft alternative D) is not necessarily compatible with preservation of watershed values (under alternative C). In the draft, protection of watershed values under alternative C is virtually identical to that under alternative E.

Section 3.0
Organizational Identification

The Cache Group is a part of the national Sierra Club organization and includes 127 members in Cache and Rich counties, Utah. Members of the Cache Group include, among others, students, public employees, hourly workers, teachers, scientists, engineers, lawyers, doctors, housewives, and retirees. Our membership rolls list native Utahns and people who have moved to Utah from throughout the United States. Together, we all share a common interest in this nation's environment and public lands.

Cache Group members have traveled extensively throughout Utah, and especially in the San Juan Resource Area. They have explored the BLM's large land holdings in southeastern Utah whenever possible. As a citizen's organization we often have studied and reviewed the BLM's many management plans for various tracts as they have become available.

No person in the Cache Group is paid to perform the many conservation tasks we choose to engage in. The information presented by these written comments represents countless hours of dedicated volunteer work.

Wilderness designation and preservation, along with other established public lands protection catagories including Areas of Critical Environmental Concern and Outstanding Natural Areas, is not driven by any self serving or profit oriented motive;rather, out goal is to protect the land for its own sake. From that protection will come other uses that will benefit the entire nation. These uses include recreation for outdoor enthusiasts, habitat for wildlife, watersheds for communities, rivers for fish, rangeland for agriculture and natural scenic beauty for all Americans. This is a true multiple use of this nation's public lands.

Section 4.0
Areas of Critical Environmental Concern

The Cache Group urges the BLM to establish additional Areas of Critical Environmental Concern (ACEC) as defined by the 1976 Federal Land Policy and Management Act.

Within our proposed ACECs, the Cache Group recommends the following protection and management criteria:

1. All ACECs would be closed to oil and gas leasing.

2. All ORV activity with ACECs would be restricted to exsisting roads except in culturally critical ACECs. This would help reduce and discourage pot hunting and vandalism.

3. Withdraw the ACEC from mineral entry.

4. Allow livestock use within the ACEC only if original values can be protected, i.e. scenic, cultural, natural or wildlife.

5. Exclude ACEC from vegetation manipulations, land treatment and range improvements.

6. Managed the ACEC area under Class I Visual Resource Management criteria.

7. Exclude private and commercial woodland production within ACECs.

Specific ACEC proposals follow:

4.1 Canyonlands Basin.

An ACEC should be established for all BLM lands which are visible from either Canyonlands National Park, BLM's Needles Overlook or BLM's Canyonlands Overlook. This will protect:

(a) cultural values found in the basin
(b) the National Park boundary
(c) Hatch Point Cliffs
(d) Lockhart Basin
(e) an important archeoastronomy site
(f) numerous rock art sites

[Comment page 3]

Section 4.0. This comment's suggestions regarding management prescriptions for ACECs have been reviewed. The approach taken in the draft was to apply the least-limiting level of restriction neccessary to resolve resource conflicts, as directed by IBLA (76 IBLA 395 (1983)).

On the basis of this and other comments, the preferred alternative has been revised to propose ACEC designation for several areas mentioned in this comment; the other areas nominated in this comment have been analyzed in alternative D (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). See the response to comment 2 from National Parks and Conservation Association for a discussion of all areas suggested in this comment. In the proposed RMP, the Cajon Pond proposed ACEC (part of the draft preferred alternative) has been absorbed into the Hovenweep proposed ACEC. It is treated as a special emphasis area within the ACEC.

This comment mentions integral vistas important to area visitors as one rationale for proposing the Canyonlands Basin for designation as an ACEC. ACEC designations are not necessary for the protection of integral vistas. In a speech before the National Recreation and Park Association's 1985 Congress for Recreation and Parks, Secretary of the Interior Hodel stated that integral vista designation and protection measures should be handled by state governments, not by BLM. (A news release issued October 25, 1985 by the Office of the Secretary covered the text of that speech. See also 40 CFR 52, January 23, 1986; 51 Federal Register 3046.)

(g) integral vistas important to area visitors

4.2 Beef Basin.

All lands between Canyonlands National Park, Manti-La Sal National Forest and Dark Canyon Plateau which can be viewed from the National Park should be placed into an ACEC. This would include parts of Beef Basin, Dark Canyon Plateau, Cathedral Butte and Fable Valley. The scenic and cultural values are exceptional here.

4.3 Natural Bridges.

An ACEC adjoining Natural Bridges National Monument is important for continued visitor enjoyment. Natural Bridges is a very small park, and many who enjoy the broad vistas from the park do not realize that they are really viewing BLM lands. This is where the BLM has a responsibility to manage the neighboring tracts for the benefit of the park's visitors.

An ACEC here should include:

(1) Woodenshoe Butte
(2) The Toe
(3) Deer Canyon
(4) Harmony Flat

Most of the lands between the National Monument and the nearby Manti-La Sal National Forest qualify for ACEC designation.

4.4 Hovenweep.

A 2000 acre Hovenweep ACEC should be established by the BLM so that important cultural and scenic values can be protected. The National Park Service recommended this protection in its 1985 Hovenweep National Monument Management Plan. If the BLM finds that it cannot protect and manage this area through ACEC designation, then it should be transfered to the National Park Service since the area is integral to archeological sites in the monument.

4.5 Glen Canyon National Recreation Area.

All lands within the Glen Canyon National Recreation Area that are administered by the San Juan BLM office should be given ACEC status. This area has exceptional natural, scenic, cultural and wildlife values.

4.6 Cedar Mesa

The Cache Group supports ACEC designation based on the proposed archeological district in alternatives C and D. This ACEC should include:

(1) Grand Gulch
(2) Johns Canyon
(3) Slickhorn Canyon
(4) Fish and Owl Canyons
(5) Lime Canyon
(6) Road Canyon
(7) Mule Canyon
(8) Arch Canyon
(9) Comb Ridge

The above areas all contain significant and outstanding cultural, scenic and natural values. The draft plan supports this by noting that this area has a wealth of undisturbed Basketmaker and Pueblo sites. Without adequate protection, the entire area will be very vulnerable to pot hunting.

4.7 Alkali Ridge.

The Cache Group encourages the BLM to adopt the 170,320 acre Alkali Ridge ACEC as described in alternative D. It is unfortunate that the BLM chose to reduce this proposed ACEC's size to only 35,890 acres in alternative E.

If the larger ACEC is not established, then the important cultural artifacts found here, namely the Basketmaker and Pueblo indian village sites, will be subject to increased pressures from vanadalism, energy development and exploration, road construction and proposed vegetation manipulations.

4.8 White Canyon Complex.

The cultural and scenic values for the area from Utah state route 95 to Drak Canyon Plateau and Manti-La Sal National Forest should be protected through ACEC designation. This area should include:

(1) Cheesebox Canyon
(2) Gravel Canyon
(3) Long Canyon
(4) Fortknocker Canyon
(5) Jacob's Chair

4.9 Moki-Red Canyon Complex.

The cultural values of the lands in the Moki-Red Canyon area will best be protected through ACEC designation. Designated lands should include:

(1) Red Canyon
(2) Cedar Canyon
(3) Forgotten Canyon
(4) Moki Canyon
(5) North Gulch
(6) Lake Canyon

4.10 Dark Canyon and Middle Point.

A Dark Canyon/Middle Point ACEC would protect substantial scenic, cultural and natural values in this area. The Cache Group finds the BLM's proposed designation of Dark Canyon as an ACEC to be very encouraging, but Middle Point should be included as well.

As the BLM is probably aware, Dark Canyon and the surrounding area has been receiving significantly more and more recreational use each year. The primitive recreational values of this area far exceed any other planned and potential development concerns.

4.11 Cajon Pond.

The Cache Group supports a Cajon Pond ACEC with a minimum of 40 acres. It would be better to expand this ACEC to at least 250 acres to best protect this unique area.

Section 5.0
Outstanding Natural Areas

The Cache Group has identified several locations in the San Juan Resource Area which should be designated as Outstanding Natural Areas (ONA). This designation will give the following areas the recognition they deserve for their outstanding recreational and scenic values.

5.1 Canyonlands Basin.

All lands within the Canyonlands Basin should be designated as an ONA. This area is especially important because of neighboring Canyonlands National Park. This park is receiving more and more visitors each year. These visitors come partly to experience the grand vistas and scenic wildlands which surround the park, but they probably do not realize that many of the visible lands have poor and inadequate protection. The lands in Canyonlands Basin are a natural extension of the National Park; ONA status will best protect these lands for their recreational and scenic values.

5.2 Cedar Mesa.

All roadless lands in the Cedar Mesa ACEC (as outlined in section 4.6) should be given ONA status.

5.3 White Canyon Complex.

This entire area as described in section 4.8 should be given ONA status.

5.4 Dark Canyon and Middle Point.

All the lands in the Dark Canyon and Middle Point area should be recognized for their outstanding qualities through ONA designation. This is especially important with the increased use of this area for primitive recreation.

[Comment page 7]

Section 5.0. This comment identifies several areas for ONA designation. BLM is phasing out this designation in favor of the ACEC designation. This comment recommends designation of the nominated area as an ONA on the basis of scenic, natural and recreational values. An ACEC designation cannot be based solely on recreational values (43 CFR 1610.7-2(a)(1)). See the response to comment 2 from National Parks and Conservation Association for a discussion of all areas suggested in this comment.

Congress did not direct that public lands be managed so as to buffer areas administered by NPS, or to preserve park values. See response to comment 2 from National Parks and Conservation Association for a discussion of this topic.

Section 6.0
Specific Issue Concerns

6.1 BLM's Failure to Recognize Cultural Resource Values.

By selecting alternative E, it is apparent that the BLM has failed to recognize its own reports on cultural resource values in the San Juan Resource Area. Alternative E does not provide adequate protection for the resource area, even though the draft plan states:

> Archeologically, the San Juan Resource Area is one of the richest locales under BLM management (pg 3-60).

and

> Archeologists estimate that the San Juan Resource Area may hold as many as 200,000 (archeological) sites (pg 3-60).

however, the BLM goes on to note

> Many sites have been disturbed or destroyed through human activity over the past 100 years. It is now difficult to find undisturbed cultural resources (pg 3-60).

The RMP must include stringent actions to protect these irreplaceable resources. The actions should include:

(a) protect all potential archeological sites until a thorough inventory is completed.

(b) develop criteria to restrict and eliminate destructive off-road vehicle, land treatment and energy development activities.

(c) increased patrols for cultural resource protection.

(d) evaluation of sites for National Historical Registor nomination.

(e) Additional acreage around exsisting sites.

The BLM might say that this cannot be done because of budget restrictions and reductions. However, if a "Cultural

[Comment page 8]

Section 6.0. BLM recognizes the need to protect cultural resources. BLM is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The draft provides for inventory to identify cultural sites, and for protection of sites (draft page 2-6).

As stated above, BLM can close areas to ORV use or minerals development only where these measures would be the least restrictive measures necessary to protect other resource values. The proposed RMP would limit ORV use over about two-thirds of SJRA; many areas with high cultural resource values would be closed to ORV use, and other areas would have ORV limitations (draft table 2-8, as revised).

The draft discusses the potential for nominating cultural resource sites to the National Register (draft page 2-6 and table 2-20).

BLM is also concerned with enforcement of laws protecting cultural resources. However, the RMP is a land-use management plan which provides for the allocation of multiple uses under law (draft page 1-10). The RMP does not plan for illegal resource uses or provide an appropriate forum to resolve administrative concerns such as funding and personnel needs (draft table I-2 and figure I-3).

Resource Plan" was developed for this area, the BLM could then highlight to Congress that critical need for special management and financial considerations in the San Juan area.

6.2 National Park Protection.

The BLM must use the San Juan RMP to better protect the various National Park Service units found in this area. This includes:

(a) Canyonlands National Park
(b) Hovenweep National Monument
(c) Glen Canyon National Recreation Area
(d) Natural Bridges National Monument

Protection of adjacent lands is important to protect park vistas, cultural resources, natural ecosystems, recreation opportunties and wildlife resources.

6.3 Financial and Cost Review.

The Cache Group questions several of the values presented in table 2-4, "Summary of Estimated Management Costs, by Alternative." Since Alternative D requires minimal management through reduced development activity, why then does it cost more than any other laternative? It appearsa that subactivities 4311 (Forest Management), 4351 (Habitat Management), and 8100 (Range Improvements) appear to be overvalued.

6.4 Wilderness Proposals.

The Cache Group recognizes that the RMP's purpose does not include pursuing wilderness designation, yet, this issue must be better accounted for in the plan. During the past year, a number of proposals were submitted regarding wilderness designation including one from the Utah Wilderness Coalition. Many BLM lands within this 5.1 million acre proposal are within the San Juan Resource Area.

The RMP should carefully review the comments written regarding the UWC's proposal since the issues raised during the DEIS comment period are very relevant to the San Juan Resource Area. Many people supported the UWC's proposal and submitted either oral testimony or written comments. Land use planning for the San Juan Resource Area should include the presented concerns.

[Comment page 9]

The draft (page 2-6 and table 2-7) identified areas where specific cultural resource management plans would be developed; these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29).

Section 6.2. The NPS Organic Act, as amended, which regulates use of NPs, does not address the administration of public lands; it does not require the Secretary to leave public lands unimpaired to preserve park values. To the contrary, in FLPMA Congress provided that public lands are to be managed for multiple use and sustained yield, whether in proximity to an NPS unit or not (draft page 1-9). BLM planners are under no obligation to protect NPS units, just as NPS planners are not required to protect public land uses.

Section 6.3. Budget figures shown in draft table 2-4 are in error and have been corrected (see revisions to draft table 2-4 and appendix K). See the response to comment 9 from Southern Utah Wilderness Alliance for a full discussion on this topic.

Section 6.4. The comments submitted by the Utah Wilderness Coalition in support of wilderness designation in Utah will be reviewed and answered as part of the statewide wilderness EIS effort. The RMP addressed management of public lands in SJRA if released from wilderness review by Congress without wilderness designation (draft page 1-2).

6.5 Developed Recreation Sites.

The Cache Group supports the developed recreation sites listing proposed for both Alternative C and Alternative E. These sites include:

(a) Comb Wash Campsite
(b) Arch Canyon Campsite
(c) Indian Creek Campsite
(d) Indian Creek Falls Campsite
(e) Pearson Canyon Hiking Trail and Campsite

Our support is contingent upon protection of surrounding cultural, scenic and wildlife values.

6.6 National Register Properties.

The following properties should be added to the National Register of Properties:

(a) Kachina Panel
(b) Monarch Cave
(c) Three Story Ruin
(d) Ruin Spring
(e) Davis Canyon Archeoastronomy Site
(f) Moon House Ruin
(g) Shay Canyon Petroglyph
(h) River House Ruin
(i) Three Kiva Pueblo
(j) Butler Wash Ruin
(k) Mule Canyon Ruin

6.7 Petrified Wood Collection.

The Cache Group is opposed to any attempt to allow or promote petrified wood collection on BLM lands in the San Juan Resource Area. This mineral wood should be considered as unique and rare a resource as any ancient indian artifact.

6.8 Recreational Usage.

The Cache Group reminds the BLM that the San Juan Resource Area is becoming more and more popular every year. From the RMP,

> The SJRA attracts recreationists from throughout the United States and abroad. White water

[Comment page 10]

Section 6.5. BLM appreciates this support of the developed recreation sites listed in the preferred alternative.

Section 6.6. BLM recognizes the importance of the sites mentioned in this comment (draft table 2-2); however, it is not cost-effective for BLM to nominate individual cultural properties to the National Register. Anyone, including the commentor, can nominate cultural sites to the National Register. BLM manages sites that are potentially eligible for listing the same as sites that are listed on the National Register (draft page 2-6); therefore, the outcome of RMP decisions would not be affected, regardless of whether the sites are nominated, listed, or not nominated.

Section 6.7. Petrified wood, very common within SJRA, is not managed under the same regulations as are ancient Indian artifacts (draft chapter 3). Based on agency review, the draft has been revised to show that SJRA will not be designated as open for petrified wood collection; instead, no areas will be designated as closed (see revisions to draft, page 2-3). BLM believes that this maintains the status quo, which is not the equivalent of promoting the collection of petrified wood.

> rafting, backcountry use, archeological observation, ORV use and sightseeing are major recreational activities in the SJRA. The San Juan River, the deeply incised canyons and the extensive archeological resource contribute to these activities (pg 3-66).

This seems to underscore the need for land protection as outlined by the Cache Group. The BLM, however, further underscores this point by noting,

> Visitor use, both motorized and nonmotorized, is expected to increase substantially by (the year) 2000 (pg 3-66).

Also in the RMP, the BLM notes that gold, uranium, limestone, tar sand and coal production is either not significant or not possible. For example, from the RMP,

> Tar Sands.
> There is no known quality or quantity of reserve (of tar sands). (pg 3-17)
>
> Coal.
> Production of coal from the San Juan region has been insignificant. (pg 3-10).
>
> About 212,000 acres of very poor quality coal deposits underlie public lands in the San Juan Coal Field. This is the only area that would be considered for coal development. (pg 4-8)
>
> Gold.
> The gold along the San Juan River is very fine and cannot be removed in quantity using conventional methods. (pg 3-27).

With these points, and many other similar items, it appears that the BLM should strive for resource protection rather than resource development. With this protection, through ACEC, ONA and wilderness designation, comes not only physical land protection but also protection for wildlife habitats, cultural artifacts, primitive recreation opportunties and watersheds.

Yet, the RMP does not seem to address this. Instead, the BLM is striving for a "balance" between a heavy demand such, as recreation, wildlife and culural protection, and a low demand such as mineral extraction and land development. The

[Comment page 11]

Section 6.8. BLM recognizes that protection of some values may result in the production of others; for example, the protection of scenic resources may result in the production of recreational opportunities. Accordingly, no alternative in the draft can be labled either a production or a protection alternative; each alternative protects some values and produces other values or opportunities (draft page 2-12).

Leaving part of SJRA open for mineral development does not ensure that development would occur, any more than leaving the area open to recreation use ensures that recreational use would occur. Where mineral potential is poor, it may be assumed that the prospect of mineral development is correspondingly poor (draft chapter 4).

proposed BLM "balance" provides too much weight for the low demand items.

6.9 Wildlife Resources.

The Cache Group recommends maximum natural protection for the Desert Bighorn Sheep, Pronghorn Antelope, Deer, and Riparian/Aquatic environments. This protection should be through land protection without chainings, chemical sprayings and other forms of non-native habitat manipulation. ACEC and ONA protection would be helpful to meet the requirements for adequate wildlife protection.

[Comment page 12]

Section 6.9. The preferred alternative in the draft provided the maximum protection believed necessary to protect crucial habitats of big game species and riparian areas (draft appendix A). Land treatments that were considered to have the potential to adversely affect wildlife were not carried into the preferred alternative (draft figure 2-15, as revised). When specific land treatment projects are proposed, site-specific NEPA documentation would be prepared; this would identify any adverse impacts projected to occur to wildlife, and the project could be modified accordingly (draft pages 2-1, A-1, and A-29).

Change to the EIS? Yes.

Section 7.0
Miscellaneous Comments

The Cache Group thanks the BLM for extending the comment deadline to November 3, 1986. We also thank the BLM for providing us with additional copies of the draft RMP.

COMMENT 7

WEMINUCHE GROUP
Sierra Club
P.O. Box 1696
Durango, CO 81301

October 31, 1986

Area Manager Ed Scherick
San Juan Resource Area
P.O. Box 7
Monticello, UT 84535

Dear Mr. Scherick:

The Weminuche Group of the Sierra Club represents about 150 members residing in southwest Colorado. Many of our members are frequent users of the federal lands affected by the San Juan Resource Management Plan. For that reason we would like to comment briefly on the Draft Environmental Impact Statement (DEIS) dated May 1986.

The federal lands in southeast Utah are unique. They represent some of the most exposed geologic history anywhere in the world. In addition, the cultural resources and opportunities for solitude and a true wilderness experience are qualities that deserve protection from human activities that would diminish or destroy those qualities.

Of the five alternatives presented in the DEIS, we can support only Alternative D. The preferred alternative, Alternative E, fails to provide adequate protection to the unique qualities mentioned above.

Of particular concern is the emphasis given to grazing on these lands and activities that support grazing, including vegetation treatment practices such as chaining. Only massive federal subsidies make these lands in any way practical for grazing. Below market value leasing and range manipulation at taxpayer expense should cease. The adverse impacts of continued and expanded grazing activities, as described in Alternatives A, B and E, are unacceptable.

Expanded off-road-vehicle use also constitutes a major threat to cultural resources, natural vegetation and wildlife, and the opportunities for primitive recreational experiences. Alternative D provides the most acceptable conditions for ORV use.

We urge you to grant outstanding natural area (ONA) status to Cheesebox Canyon and Mancos Mesa in addition to the others specified in Alternative D.

Thank you for this opportunity to present our comments on your proposed Resource Management Plan. Please keep us on your list of interested parties and notify us of your decisions regarding the RMP and other activities that might impact these lands.

Sincerely,

Lewis McCool
Chairman

RESPONSE TO COMMENT 7 — SIERRA CLUB, WEMINUCHE GROUP

[Comment page 1]

BLM agrees that geologic resources in SJRA present unique opportunities.

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Grazing use of public lands is authorized under the Taylor Grazing Act and FLPMA, and will be allowed to continue within the parameters of BLM's multiple use mandate.

The comments regarding ORV use and ONA designations are noted. BLM has dropped the ONA designation in favor of the ACEC designation.

Change to the EIS? No.

COMMENT 8

October 28, 1986

Ed Scherick, San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Mr. Scherick,

I would like to go on record for submitting these comments for the San Juan Resosurce Management Plan. First, it is my opinion that coal unsuitability criteria should be established as early as possible in the planning process. Second, if leases are issued will there be a chance for citizen input? And third, I would suggest that you do not lease coal resources; also do not designate coal lease areas, lease coal or allow coal exploration.

I do not think there should be any coal leased or mined within the boundaries of the San Juan Resource Management Plan. There is plenty fo coal being mined in the Price area already.

Thank you for considering these comments.

Sincerely,

Lucy Kehr

Lucy Kehr, Coal Issue Specialist
Utah Chapter, Sierra Club
872 North Oakley Street
Salt Lake City, Utah 84116

RESPONSE TO COMMENT 8 SIERRA CLUB, UTAH CHAPTER

[Comment page 1]

The draft indicates that neither coal leasing nor designation of coal lease areas is contemplated at this time due to the poor showing of coal in place, and that coal exploration is not expected to occur (draft pages 2-2, 3-17, and 4-61). The draft further states (page 2-2) that the unsuitability criteria will be applied and the RMP amended if coal leasing ever becomes probable. The public would have an opportunity to provide input into the application of the coal unsuitability criteria, which would be used to establish areas suitable for leasing. There is no provision for formal public comment regarding issuance of individual leases within areas found suitable for leasing. Coal exploration in unleased areas, if any, would occur under an exploration license (43 CFR 3410) and would be subject to surface use restrictions established in the RMP.

Change to the EIS? No.

COMMENT 9

SOUTHERN UTAH WILDERNESS ALLIANCE

November 3, 1986

Mr. Ed Scherick,
Area Manager, San Juan Resource Area
Moab District, Bureau of Land Management
Monticello, Utah 84532

Dear Ed,

Please consider the following brief RMP comments on behalf of the Southern Utah Wilderness Alliance. I have spoken with a Mr. Rod Greeno of Camp Douglas, Wisconsin and he has authorized SUWA to incorporate his personal comments to BLM on the RMP regarding LIVESTOCK AND VEGETATION MANAGEMENT into our own comments. Please consider that section of his letter of October 23, 1986 as part of the statement to follow.

In addition, Mr. Greeno has raised a critical issue that I would like to stress again now. In 1980 the BLM prepared a draft Grand Gulch Plateau Management Plan and a subsequent Grand Gulch Interim Management Plan in 1981 which, you may remember, was signed off on by yourself.

That planning effort involved a significant amount of public participation, including public meetings and a public comment period that generated both an oral and written record of public interest and concern. Your final decision at that time was to defer most planning issues and conflict resolution until such time as this RMP could be prepared. We are now at that point in time. I would like to presently request that ALL public comment, whether written or oral transcript, that was generated at that and referenced unresolved issues in 1980-81, now be entered formally on

BOX 347 SPRINGDALE, UTAH 84767 (801) 772-3468

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment cover letter]

This comment incorporates by reference the comments of Rodney Greeno (see the responses to comments 66 and 67 from Rodney Greeno).

After consideration of this comment, as an appendix to the proposed RMP and final EIS, BLM has added an analysis of public comments received on the draft Grand Gulch Plateau Management Plan (see revisions to draft appendix AA). The comments received at that time are not printed here because they were not addressed to the draft RMP/EIS. The consensus of comments on the Grand Gulch draft was that no activity plan should be prepared prior to completion of this RMP. Therefore, the draft Grand Gulch plan was never completed (MSA page 4333-15, draft page 3-77). The interim plan was prepared as an internal document to guide BLM management of the Grand Gulch Primitive Area until this RMP could be completed (MSA page 4333-15, draft page 3-77). The interim plan was not put out for public review; therefore, no public comments were received or analyzed. It will be superseded by this RMP.

the record and incorporated into the current public participation and comment analysis.

The following comments on the draft San Juan RMP/EIS were mailed by Certified/Return Receipt on November 3, 1986.

Sincerely,

Clive Kincaid
Executive Director

CONTRIBUTORS: Mike Riley, Del Smith, Janet Ross, Josh Kardon

COMMENTS REGARDING:

THE SAN JUAN RESOURCE AREA
DRAFT RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

Submitted by:

The Southern Utah Wilderness Alliance

November 3, 1986

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FATAL FLAWS IN THE SAN JUAN RMP/EIS

Wilderness Studies and the BLM's Planning Process

The RMP has failed to consider one of the most significant resource issues affecting the San Juan Resource Area. Wilderness suitability and non-suitability recommendations are specifically provided for in the BLM's Wilderness Study Policy as emanating directly from the planning process. This is identified in that policy as possibly occuring in three separate ways: a component of a Transition Management Framework Plan, as an Amendment to an existing Manangement Framework Plan, or as an element in a Resource Management Plan (RMP).

BLM has failed, as required by that policy, to analyze this significant resource issue in this RMP and arrive thereby at recommendations on the wilderness resource. As BLM notes in the RMP section on Alternatives Considered But Eliminated, "because wilderness suitability is being studied in that (Statewide Wilderness) EIS, it will not be covered in the San Juan RMP/EIS."

We are certain that this is an egregious failure, and an arbitrary and capricious disregard for the purpose and intent of the established policy.

The Utah BLM Statewide Wilderness Draft Environmental Impact Statement is an unsatisfactory and inappropriate standard of review for wilderness suitability recommendations. It does not provide the necessary information adequacy and level of analysis of complex site-specific land-use conflicts that surround major resource allocations such as wilderness designation. Copious data and analysis have been provided in the RMP process that was lacking in the Wilderness DEIS. Much of this data specifically affects the suitability or non-suitability of WSA's in the Resource Area, as well as virtually all other resources, and yet the RMP fails to properly utilize and consider this data relative to the wilderness resource and in total contradiction to existing BLM policy.

We insist that the draft RMP/EIS is therefore fatally flawed and must be reissued, fully incorporating the wilderness suitability issue and properly comparing and analyzing its relation to all other resource values, issues, and conflicts which are well established in detail in the RMP.

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 1]

The Wilderness Study Policy did provide for wilderness suitability recommendations to be developed through the planning process. However, in Utah, BLM was permitted to study wilderness suitability through a statewide EIS. Accordingly, this RMP/EIS discusses options for management of areas now under wilderness review in the event Congress drops them from further review without wilderness designation (draft page 1-2).

It is assumed that areas released by Congress from wilderness review would be managed for nonwilderness purposes. Therefore, BLM did not attempt through the RMP to protect wilderness values in areas released from wilderness review, nor to assess the impacts to those values. If an area is designated as wilderness, its wilderness values would be managed under BLM wilderness management policy. While under wilderness review, areas will continue to be managed under the BLM interim management policy (draft page 1-3).

BLM acknowledges that the data and analysis used in the statewide wilderness EIS was not used in this RMP/EIS. However, BLM sees this as a logical division of analysis, and does not agree that this decision was arbitrary and capricious, or that it presents a fatal flaw in the development of this RMP.

planning documents, but are virtually absent in the Statewide Wilderness DEIS.

Elimination of Preliminary Potential ACEC's Require NEPA Review

The documented decision to eliminate preliminary potential ACEC's in Appendix H of the RMP/EIS is the first public notice of the decision to not identify several potential ACEC's which would be subject to further consideration through the planning process.

We are concerned that this decision is a significant and controversial action that was not made pursuant to any NEPA analysis or public comment, and that this step is still necessary and as yet incomplete.

Cultural Resources Are a Critical Planning Issue

The failure to include cultural resource management and protection as a planning issue is an important error which invalidates the RMP. Using BLM's own planning criteria in Chapter One, it is possible to identify several reasons why land use conflicts affecting the management of cultural resources should have been directly addressed as an issue. Additional detail is provided under Cultural Resources, below.

Preferred Alternative Fails to Address Information Contained in MSA, Is Not a "Balanced" Approach

The RMP is severly flawed in that resource allocation recommendations contained in the preferred alternative frequently do not provide for protection of fragile non-renewable resources, do not provide for long-term sustained yield of public lands beyond the life of the plan, and do not represent in any sense a "balanced" approach to multiple use land management.

For virtually every resource, recommendations in the preferred alternative of the RMP do not reflect the resource analysis, management evaluation and recommendations presented in the MSA. Recommendations for protection of fragile and non-renewable resources contained in the MSA are repeatedly omitted from the RMP. Agents of destruction, though identified in the MSA, are seldom if ever addressed in conflict analysis in the RMP. Repeatedly, critical impact thresholds are shown to be rapidly approaching for fragile resources, yet no management actions are recommended to stem the downward trends in resource condition in the RMP. Inadequacies identified in ongoing

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 2]

Elimination of Preliminary Potential ACECs Requires NEPA Review

Decisions to drop preliminary potential ACECs from further review were made in accordance with BLM manual guidance (section 1617.8). The manual does not require NEPA review of candidate areas until the District Manager decides what areas should be considered as potential ACECs (manual section 1617.82 A.3.b.); these areas are carried into the RMP/EIS, which satisfies the NEPA requirement. Based on the review of public comments, appendix H has been revised to clarify BLM's rationale for disposition of preliminary potential ACECs (see revisions to draft appendix H).

Cultural Resources are a Critical Planning Issue

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1); however, management of cultural resources was noted as a managment concern (draft page 1-6). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

Preferred Alternative

This comment refers to the "life of the plan". The RMP is open-ended and will be changed over time as necessary (draft appendix B). The EIS used an analysis period of 15 years, or until the year 2000 (draft pages 1-11 and 4-1). The RMP will be monitored and changed as necessary; major changes to the plan would take place through plan revisions (draft pages A-30 and A-31).

The MSA is an internal (or "shelf") document prepared by the RMP team prior to the draft (page I-5). It provides a preliminary analysis, or transition, between raw inventory data and the discussion of the current situation ("no action alternative") and affected environment contained in the draft (chapters 2 and 3). Because it presents a foundation for the RMP/EIS which follows, not all of the information contained in the MSA is carried forward into the draft. The MSA does not make management recommendations, but rather identifies management opportunities and constraints for every management program addressed. These are summarized in MSA table 0-2, page 0-5, and in draft table I-2, page I-6. Every management opportunity identified in the MSA has been resolved, in alternative ways, in the draft.

management programs are seldom addressed in the RMP, and opportunities to improve management contained in the MSA are not addressed in the RMP.

The absence of tracking with MSA analyses gives the illusory appearance to the RMP that sustained yield is occurring and anticipated in the future, when in fact closer inspection reveals the opposite to be a more reasonable expectation for a large number of programs. This is especially disturbing in light of the fact that the MSA document was *not* distributed for public review, and the average person reading only the RMP is not likely to be aware of the wealth of detailed resource information contained in the MSA which in many cases suggests management actions in direct conflict with those contained in the preferred alternative.

Perhaps the most significant flaw is the distortion of the concept of "balanced use" reflected in the preferred alternative. Though no definition of balanced use is provided in the documents, the average person might assume it describes an approach where fragile resources are protected, while at the same time reasonable provisions are made for consumptive uses. Also implied is recognition of special obligations incurred where resources are important on a national scale; clearly such resources should be managed for the benefit of a larger public than might otherwise be the case.

In the SJRMP, it was frequently the case that opportunities to develop management categories and special designations which would protect fragile resources *and at the same time* meet reasonable projected consumptive use needs were repeatedly foregone. Even areas where moderate to low materials values were present were left open to consumptive and potentially destructive uses. In a region where fragile recreation, visual, cultural, vegetative, wildlife and other values are nationally significant, this represents an unwarranted invitation to future resource damage and development of severe land use conflicts. Such an approach was made possible and only barely recognizable by the lack of follow-through with supporting information from the MSA, and the almost total lack of analysis of resource conflicts within individual program descriptions in the RMP.

The Grazing EIS Does Not Comply with the Terms of NRDC vs Morton

The resolution of the grazing issue in the RMP/EIS is flawed in two kkey ways. First, BLM clearly has no data upon which to base the analyses and management actions presented in the RMP. This

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 3]

This comment alleges several inadequacies, such as lack of tracking between the MSA and draft and flawed analysis in the draft. The comment is noted; however, BLM has confidence in the adequacy of the draft's NEPA analysis.

The Grazing EIS Does Not Comply with the Terms of NRDC vs. Morton

The data BLM used as a basis for the analyses and management actions regarding grazing are documented in the MSA (page 4322-1 et seq.) and in the draft (cnapter 3 and appendixes D, J, M, N, O, P, T, U, W, and X). BLM is confident that the draft meets the requirements of the NRDC lawsuit.

The draft does not state that 95 percent of the range is in unsatisfactory condition; it states that 95 percent of the areas falls within grazing allotments categorized as I (draft page 3-54). See the response to comment 3 from National Wildlife Federation, comment page 8.

fails to meet the requirements of the 1974 NRDC lawsuit that required a site-specific EIS.

Second, resolution of the livestock management under Alternative E inadequately addresses the need to control further range degradation through livestock use reductions. This is especially important since 95% of the range is currently categorized by BLM as in unsatisfactory condition.

Alternative 'D' Was Prepared in Bad Faith

It would appear as though selected recommendations in Alternative D were prepared in a manner so as to reduce the feasibility of this "conservation" approach. These recommendations were developed arbitrarily, and had the effect of doubling the price of this alternative and rendering it unrealistic and infeasible.

The average reader might expect the conservation approach to cost more due to the increased costs of monitoring, protecting, permitting, etc. of fragile resources which are maximized in this alternative. Inspection of Table 2-4 (2-51) however, reveals no significant differences in program costs between Alternatives D and E (the preferred or "balanced" approach) for any programs other than 4322, Grazing Management, and 8100, Range Improvements. Grazing program costs were greater by a factor of 2.6 in Alternative D, and Range Improvement costs were greater by a factor of 13.3. Combined, the two programs cost $1,743,000 more in Alternative D than Alternative E. This difference is greater than the *total* projected costs for Alternative E ($1,686,100).

Analysis of costs contained in Appendix K barely mentions the cause of this tremendous difference in costs for these two alternatives. We are, however, provided with one clue: "Increased investments for livestock, recreation and wildlife are proposed, with one of the major investments being riparian fencing" (A-97).

Recommendations for wildlife under Alternative D do in fact include fencing of riparian habitat (4-55). Although the specific riparian areas designated for fencing are not identified, information in Chapter 3 tells us that riparian areas total about 1,500 acres for 480 miles of water courses on public lands, "using and average corridor width of 25 feet" (3-49).

The width of this corridor is clearly inadequate, and in fact contradictory to widths discussed in the

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[Comment page 4]

Alternative D was Prepared in Bad Faith

The alternatives presented in the draft were developed to present a feasible range of management options (draft page 1-10). However, an error was made in preparing budget projections presented in the draft. Budget projections have been reviewed and corrected (see revisions to draft table 2-4 and appendix K).

Budgets presented in the draft mistakenly reflected the cost of installing all riparian fencing in a 1-year period, and all other rangeland investments over a 15-year period. The budgets presented in the proposed RMP and final EIS have been adjusted to reflect the average annual cost of implementing each alternative over a 10-year period (the implementation period stated on draft page A-29). Only the grazing and range improvement subactivities required adjustment.

Riparian fencing cost projections under alternatives C and D assumed that half of the miles of riparian habitat would actually need to be fenced on both sides of the waterway; it was assumed that topographic features would exclude livestock on the other half of the riparian mileage. The cost of fencing was estimated at $3,000 per mile.

The revised budgets differ significantly from the original projections in both the relative and the total costs. Under the revised budget projections, alternative A would be the least costly to implement (at $1,322,700), followed by alternative D ($1,660,600), alternative E ($1,729,200), alternative C ($1,890,500) and alternative B ($1,950,600).

Under alternative B, the higher levels of grazing and associated management and investments would increase grazing and range improvement cost by 275 percent over alternative A cost projections. Under alternative C, the increased management intensity and additional rangeland improvements required would increase grazing and range improvement costs by 113 percent, although 43 percent less than projected under alternative B. Under alternative D, the greatly reduced level of grazing would reduce labor cost; however, the investments needed, particularly for riparian fencing, would increase total grazing and range improvement costs by 75 percent (although 53 percent less than under alternative B). Under alternative E, the increased management intensity and the projected improvements would increase grazing and range improvement costs by 33 percent.

Each alternative plan was based on the goals and objectives presented for that alternative (draft chapter 2). Management costs, which were not a goal in any of the alternative plans, were projected after the plans were developed. No alternative was developed on the basis of forcing a predetermined budget cost to come about.

MSA, where 0.13 miles, 0.5 miles, and 0.25 miles are considered in alternative analyses (4350-67). The most narrow of these recommendation identified in the MSA is twenty seven times larger than the 25 foot figure which is carried forward into the RMP, with no explanation of or justification for this reduction. This arbitrary decrease in riparian corridor width results not only in a decrease in acreage of riparian areas considered for protection, but an increase in the need for fencing to accomplish this protection.

Since most riparian areas occur in canyon systems which exceed 25 feet in width, protective fencing apparently requires a length of fence along each side of the linear stream corridor. Not only does the 25 foot corridor width arbitrarily depart from management approaches discussed in the MSA, it effectively precludes opportunities for efficient protection of riparian environments through fencing of natural ingress and egress points for steep and generally inaccessible canyon systems. The resulting costs are astronomical, and have the effect of seriously reducing the viability of both Alternatives D and C (where similar problems occur). The increased expense of these alternatives is clearly identified in summary comparisons of all alternatives contained in Chapter 4 (4-1), although the principal cause for these increases is not mentioned.

In sum, we feel that Alternative D may have been prepared in bad faith because the high cost of this alternative stems primarily from a single recommended action which 1) is arbitrary, capricious, and not consistent with any previous discussions of this resource in the MSA; 2) ignores other obvious approaches which are significantly less expensive; 3) results in major reductions of protected resource acreage from that identified in the MSA in return for major cost increases; 4) is never identified as to location or extent, or subjected to impact analysis and conflict identification in the RMP; 5) is substantially ineffective in protecting riparian habitat and may in itself cause more damage than it prevents ; and 6) is a relatively minor and insignificant aspect of the conservation Alternative as a whole, yet due to high costs effectively precludes it from serious consideration.

In failing to properly describe and analyze the recommended riparian fencing actions, the RMP effectively obscures the fact that the majority of cost increases associated with Alternative D are apparently related to these actions. This severely hinders a realistic comparison of all alternatives by the public, and as such constitutes a flaw which can only be remedied by a new draft of the RMP which contains a legitimate protection alternative.

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[Comment page 5]

This comment indicates that most riparian areas in SJRA exceed 25 feet. After review of public comments, the corridor width used in the proposed RMP and final EIS has been changed to 100 feet, and total acreage to 6,000 (see revisions to draft tables S-1, 2-7, 2-10, page 3-49, table 3-6, and appendix A).

RECREATION

General Comments

In the MSA, BLM clearly identifies the need to focus management attention on protection of recreation resources and values, especially those toward the primitive end of the Recreation Opportunity Spectrum (ROS). The discussion of current and projected recreation use within the SJRA points to the need to protect the primitive and semi-primitive classes as much as possible to maintain their primitive characteristics for the future. This is especially important when the impacts of other uses, such as mining, oil and gas exploration and development, grazing, and other surface- disturbing activities are taken into account.

> "If crowding and heavy use continue at the current accelerating rate, there could be a loss of acreage in the P, SPNM, and SPM classes, and an increase in the RN and R classes" (MSA 4333-44).

> "Users looking for that [P] setting will be displaced [from already well- known and heavily used areas such as Grand Gulch and Dark Canyon] to other similar settings such as Mancos Mesa, Butler Wash...White, Cheesebox, and Mule Canyons" (MSA 4333-40).

> "It is clear from the results presented in Table 4333-15 that substantial increases in participation are expected for all (recreation) activities. For those activities taking place within the SJRA, participation is expected to increase by 20 to 30% between 1985 and 2000." (MSA 4333-38).

> "The settings towards the P end of the spectrum tend to be the most critical in the SJRA because they contain the least acreage and are most in demand,
> and because many management actions tend to change the setting away from the P end of the spectrum" (MSA 4333-40).

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[Comment page 6]

Recreation: General Comments

The MSA does not identify the need to focus management on primitive recreation, as stated in this comment. The MSA (page 4333-44) indicates that, if current use continues, there will be a loss of acreage in primitive and semi-primitive ROS classes and a corresponding increase of acreage in RN and R classes.

"In order to continue to provide this setting, management actions will be needed to maintain the unmodified natural environment"(MSA 4333-40).

Despite this frank analysis of current and potential recreation use and management in the SJRA, BLM has failed to carry forward into Alternative E most of the concomitant management actions and special conditions/use stipulations necessary to insure adequate protection of recreation resources, especially those on the primitive end of the spectrum. In so doing, BLM has ignored its own analysis and recommendations. This is a violation of BLM's mandate under FLPMA to protect recreational resources for current and future use, as outlined in sections 102(a)(8), 103(c), 202(c) 5 and 9.

Some key examples of this failure include:

-- In Alternative E, BLM has chosen to preserve and protect only "certain" primitive recreational opportunities as stated in both the goals and recreation management objectives for Alternative E.(2-15, 2-56)

-- In Alternative E, ORV use categories are in contradiction of the criteria and descriptions of ROS classes.

-- Overall, the special conditions for ROS classes in Alternative E are inadequate to maintain the current ROS classes. Also, in some cases ROS class boundaries do not appear to take into account adjacent federal agency management proposals or the general manageability of the class.

-- Especially in the areas BLM has identified for dispersal of projected increased use, BLM has failed to focus management attention to insure their protection through special designations and use stipulations in Alternative E.

Below, we address these areas in detail and offer suggestions on how to resolve these inadequacies in order to meet BLM's mandate under FLPMA.

Goals and Objectives for Recreation Management in Alternative E

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[Comment page 7]

FLPMA, cited in this comment, mandates that public lands be managed on the basis of multiple use and sustained yield (draft page 1-9); recreation is one of many uses on the public lands. BLM is confident that the preferred alternative does not violate the provisions of FLPMA.

Under the preferred alternative, BLM provides management prescriptions to minimize or eliminate surface disturbance in almost all P and SPNM ROS class areas (draft table S-1, chapter 2, and appendix A). Over 95 percent of the P ROS class areas would be protected by such means as closing the lands to mineral use, allowing surface disturbance only where the ROS class could be maintained, and closing the areas to ORV use. Only the P and SPNM class areas in the vicinity of Squaw and Cross Canyons, near the Colorado state line, would not come under these restrictions (draft pages A-24 and A-25); BLM views these areas as being the least likely to experience increased recreational use.

The comment regarding ORV categories and special conditions under alternative E is noted. ORV designations under the preferred alternative were based largely on existing ROS classes. ROS classes were established throughout SJRA under the ROS criteria (draft figure 3-16, table 3-10, and appendix F).

In the RMP, the management goal of Alternative E is as follows:

> "The goal of Alternative E is to manage public lands for multiple use of public resources, as long as...certain primitive recreation opportunities are protected..."(2-15).

This goal is reflected in the management objectives for recreation under Alternative E:

> "To manage areas to preserve certain ROS P class areas and protect certain SPNM ROS class areas"(2-25, Table 2-5).

The key to both of these is the word "certain," which has allowed BLM to propose to manage only a few key areas to protect their primitive recreation values. It is with this wording, and its resulting management actions, that SUWA disagree.

First, the MSA clearly states, as discussed earlier, the relative scarcity of primitive recreation resources within the SJRA. It is essential that BLM extend this discussion of scarcity to a larger state and national level--primitive recreation resources are scarce throughout both Utah and our nation as a whole. Only a small minority of all public lands in the continental United States are managed to maintain their natural and primitive recreational values. Many BLM lands, and the SJRA in particular, hold the few remaining areas we have left to protect primitive recreation resources--relatively unmodified, natural, roadless areas.

Second, BLM must acknowledge its own projected increases in demand for, and use of, all recreation resources, especially primitive recreation resources. Current management decisions will directly affect the ability of the SJRA (and public land management agencies as a whole) to meet this future demand. Unlike most other resources, primitive recreation values and resources are not renewable. Once the primitive characteristics of an area have been significantly altered, they are extremely difficult, if not impossible, to retrieve.

Both of these points are recognized in FLPMA. Section 103(c) defines "multiple use" to include management actions that:

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[Comment page 8]

Goals and Objectives for Recreation Management in Alternative E

This comment states the draft should consider scarcity of primitive recreation opportunities compared to statewide and national opportunities. The draft analyzes projected impacts to the human environment which would be expected to occur if alternative scenarios were applied to management of public lands in SJRA (draft page S-4). To be analyzed, effects must be measurable; to be considered significant, effects must cross a certain threshold level (draft page 4-2).

The value of a given type of recreation opportunity in the statewide or national arena would be a social consideration; in the draft, social changes were assumed not to be measureable if they did not cause an effect at the local level (draft page 1-11, planning criteria; see also appendix R). The planning criteria were put out for public review and comment (draft page 5-9); see also appendix R). In the draft, the affected region analyzed depended on the management action (draft page 3-91).

BLM has acknowledged an increasing demand for recreational use of public resources (MSA page 4333-34, draft pages 3-33 and 3-100), particualrly for primitive recreational pursuits. BLM also acknowledges that recreational use within SJRA has a measurable effect on the local economy (draft page 3-100). BLM is confident that the preferred alternative, which employs management prescriptions to protect over 95 percent of P ROS class areas, would protect recreational opportunities believed to be at risk.

"...will best meet the present and future needs of the American people;...that takes into account the long term needs of future generations for...non-renewable resources, including...recreation...values...."

Section 202(c)(5 and 6) state that:

"(c) In the development of land use plans, the government shall... (5) consider present and potential uses of the public lands; ...(6) consider the relative scarcity of the values involved....".

Neither of these points is recognized in BLM's goals and recreation management objectives for Alternative E.

Based on our discussion here and BLM's own analysis of recreation management in the MSA, we believe the word "certain" should be dropped from the goal for Alternative E. It should state at a minimum, that:"the goal of Alternative E is to manage public lands for multiple uses of public resources as long as...primitive opportunities are protected where possible, or whenever they alone or in conjunction with compatible values, outweigh conflicting resource values.

Also, the management objectives for recreation under Alternative E should state at a minimum: " to manage all areas so as to maintain existing ROS classes, where there are no identifiable significant resource conflicts, as well as certain other areas where primitive recreation values can still be determined to outweigh the values of other conflicting resources." This seems to be the most logical and reasonable method of balancing resource values and conflicts, without inadvertently and irretrievably losing acknowledged significant primitive values. Only by doing so will BLM be in compliance with FLPMA regarding primitive recreation resources.

ORV Use Category Designations in Alternative E

Under Alternative E, the special conditions applied to the ROS categories regarding ORV use are inadequate. These conditions do not protect the primitive characteristics and values of a particular ROS class and are inconsistent with BLM's planning guidance for ORV use (43 CFR 8340).

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BLM is confident that the goals of alternative E, which include protecting the opportunities for primitive and semiprimitive recreational uses in all of SJRA except a relatively small area near the Colorado state line (draft pages S-4, 2-15, and A-24), adequately recognize the need to protect recreational uses of the public lands.

The draft used the word "certain" in conjunction with protection of P and SPNM class areas because under the preferred alternative, areas with P and SPNM classes near the Colorado state line would not be managed to maintain the existing ROS class (draft figure 3-16 and page A-24). These areas are viewed as being the least likely to experience increased recreational use. BLM believes that this level of management would be in compliance with FLPMA.

ORV Use Category Designations in Alternative E

Under the preferred alternative, over 95 percent of the P ROS class acreage would be closed to ORV use (draft table 2-8, as revised). BLM is confident that ORV designations under the preferred alternative are adequate to meet the goals and objectives developed for that alternative.

First, BLM states clearly in the MSA the potential impact ORV's have on ROS classes, especially given projected increases in ORV use.

> "ORV use is expected to have one of the highest percentage increases in the [recreation] activities listed" (MSA 4333-40).

> "While projected increases are not expected to change the SPM and RN settings, they may change some of the SPNM settings, changing them to motorized settings" (MSA 4333-41).

These types of changes are already taking place in the Beef Basin area. (Recent heavy ORV use in the San Rafael Swell area is a prime example of the rapid and severe damage ORV use can have on an area.) Despite this, in Alternative E, BLM has designated SPM areas as open to ORV use, and SPNM areas as limited to "existing roads and trails" (A-25). This leaves not only SPNM open to serious degradation, but P areas as well due to ORV encroachment from surrounding SPNM areas.

Second, this is inconsistent with 43 CFR 8340, which establishes guidelines for ORV use designations:

> "The objectives of these regulations are to protect the resources of the public lands...." 43 CFR 8340.0-2

> "All designations shall be based on the protection of the resources of the public lands...." (43 CFR 8342.1).

Additionally, allowing any use in the SPNM ROS class and unlimited use (as the open designation implies) in the SPM class is inconsistent with BLM's own descriptions of, and set criteria for, ROS classes. As the name implies for the semi-primitive nonmotorized class, criteria and descriptions are as follows:

> "The setting may have subtle modifications; surface disturbance must be limited and small, with little or no evidence of primitive roads or motorized use (3-69)."

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[Comment page 10]

After review of this comment, the draft has been revised to place additional restrictions on ORV use in SRMAs: ORV use would be limited to designated roads and trails in the SPNM ROS class areas within SRMAs. Additionally, in SPNM areas interrupted by a mile-wide SPM road corridor, the ORV designation within the corridor was changed to conform to the SPNM area ORV designation (limited to designated roads and trails in SRMAs and limited to existing roads and trails outside SRMAs). See the revisions to draft table 2-8; see also the proposed RMP map. This change would allow better management of ORV use and protect P ROS class settings.

" Motorized use is not permitted (A-56, Table AF-1)."(emphasis added)

For the SPM class, criteria and descriptions are as follows:

"The setting may have subtle modifications; surface disturbance must be limited and small, with primitive roads and motorized use present (3-69, Table 3-10)."

"Use is to be the same as for SPNM classes, except that motorized use is permitted (A-57, Table AF-1).

The motorized-use limits discussed in these ROS class criteria and descriptions are attempting to protect, both immediately and for the future, the primitive opportunities present, especially when the "activity opportunities" for these classes are considered (A-56, A-57, Table AF-1). Also, the SPNM and SPM areas include over one-third of the SJRA, and thus a huge number of the uninventoried cultural resource potential. Unlimited use in SPM and even limited use in SPNM areas would unquestionably facilitate ignorant destruction as well as intentional vandalism of cultural resources.

Given this discussion, it is clear that BLM's special conditions for ORV use under the ROS classes are inadequate and fail to meet BLM's own standards. Changes to the special conditions for ROS classes under Alternative E will reverse this problem. The changes and/or additions that must at a minimum be made are outlined in our discussion of ROS classes below. The ORV use goal of these special conditions is to provide a continuum of use that protects the P and SPNM class areas, allows limited use in the SPM class area, and unlimited use in the RN class area. This approach best reflects the ROS criteria and descriptions, and the regulations for ORV use under 43 CFR 8340, and the revised goal and recreation management objectives for Alternative E.

The only explanation for BLM's decision to leave 1.5 million acres (or 89.5% of current acreage) open to ORV use in Alternative E is the following:

"It is anticipated that recreational ORV use would continue to be limited to nonexistent in rugged or remote areas, even when these are designated as open to

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Regarding suggested changes to the special conditions for the preferred alternative, the approach taken in the draft was to apply the least-limiting level of restriction necessary to resolve conflicts and meet the objectives of each alternative. BLM is confident that the preferred alternative presents an adequate level of ORV use management.

Under draft alternative E, 651,000 acres (36 percent of SJRA) would be designated as open to ORV use (draft tables 2-7 and 2-8). Under the proposed plan, 611,310 acres (34 percent) would be designated as open (see revisions to draft table 2-8).

ORV use" (4-71).

On what does BLM base this assumption? In some areas it is true that topography might limit some ORV use; however, these types of natural closures are few in the SJRA, are certainly not predictable, and do not account for the daring of some modern drivers. This fact, coupled with the projected increase in use for ORV's and their potential to alter the landscape and damage cultural resources, demands that a proactive and protective approach be taken with ORV use designations (as the regulations also require). BLM's above cited reasoning seems to ignore this, and is at best an attempt to gloss over the necessary management decisions and actions.

ROS Class Designations And Use Stipulations in Alternative E

In the RMP, BLM has applied a Recreation Opportunity Spectrum (ROS) system which covers the entire resource area and is based on BLM's assessment of the recreation opportunities present. While in general we feel this system is admirable, some flaws apparent.

First, in a number of areas it does not appear that management plans from surrounding public agencies were taken into account during the ROS assessment and inventory. Rather, it appears that ROS boundaries were drawn strictly to ROS criteria and only as applied to BLM lands. BLM, SPNM or SPM areas lie directly adjacent to NPS or USFS lands either proposed for wilderness designation or managed to reflect higher or additional primitive characteristics and values. It does not appear that BLM took the characteristics and values of these external areas into account when applying the ROS system, and therefore it has not been consistent with other agency planning as required under FLPMA (Section 202(c)(9). It is essential for BLM to recognize that primitive characteristics and values do not begin and end at arbitrary administrative boundaries, but must be examined in a larger wholistic context.

Some examples of this include the following:

--USFS has placed Arch Canyon in the SPNM area and closed it to ORV use. BLM has placed it in the SPM class, and opened it to unlimited ORV use.

-- Glen Canyon National Recreation Area has proposed the east shore of Lake Powell from Lake

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The assumption that ORV use would continue to be limited or nonexistent in rugged or remote areas (draft page 4-71) was based on existing use patterns, professional judgment of the RMP staff, and the knowledge of technical limits on existing ORV vehicles. Resource use will be monitored over time (draft appendix B); if field conditions change in the future, the RMP could be changed accordingly (draft page A-30).

ROS Class Designations and Use Stipulations in Alternative E

BLM applied ROS categories to public lands in accordance with BLM manual 8320. The ROS classes are generally developed from on-the-ground conditions and rating criteria (draft appendix F) rather than from proposals for a given type of management (such as wilderness proposals). Other federal agencies use different systems, so BLM ROS classes do not correlate exactly with existing designations or management proposals on other federal lands.

For the examples given in this comment:

Arch Canyon. Because it contains a county road, Arch Canyon must be in class SPM or RN.

Wilson Mesa - Nokai Dome. ROS criteria require a mile-wide strip along roads to be in a motorized class; P class areas must be at least three miles from roads and be larger than 2,500 acres. On the public lands adjacent to Glen Canyon NRA in the area mentioned by this comment, roads follow the Hole-in-the-Rock Trail and lead to Nokai Dome; also there is motorized boat use on Lake Powell. Consequently, no public lands in this area meet the P class criteria.

Canyon south to Wilson Mesa and east to Nokai Dome as wilderness. BLM has placed most of the public land east of this area in the SPNM class, some in the SPM class.

--Canyonlands National Park has proposed the majority of its lands adjacent to BLM lands as wilderness, including most of its eastern borders. Much of the BLM land adjacent to these park lands, especially along the eastern border, is designated as RN or SPM, neither of which have any protective stipulations developed to preserve them under Alternative E. In fact, the RN classification implies heavy signs of human use, including motorized use; the SPM implies slightly less use of this nature.

These inconsistencies need to be corrected through re-classification of these areas within the ROS system in order to maintain the integrity of surrounding agency plans. Contiguous lands adjacent to other agency proposed wilderness should be classed SPNM at a minimum. Those adjacent to motorized corridors within the park and otherwise surrounded by proposed wilderness areas should be designated a minimum of SPM to control ORV use.

In addition, in several areas in the southwestern portion of the SJRA, ROS classification boundaries do not appear to have taken into account manageability (i.e. whether the BLM will be able to manage the lands using the various classes and their stipulations, and still be able to maintain the integrity of all the classes over time.) It is essential that BLM recognize that islands or corridors of motorized classes within non-motorized primitive settings have the potential to encourage impacts that will encroach on surrounding non-motorized primitive settings, especially from unlimited ORV use. Often it will be difficult, if not impossible, to protectively manage these areas because no topographic or natural boundaries to motorized use exist. The result would be a drop in the primitive qualities of the areas, inconsistent with the revised goals and management objectives for Alternative E.

Examples of this, and the minimum actions necessary to correct the problem, include:

--The San Juan Arm, or the area west of Red House Cliffs and south of U-263. The majority of this area is P or SPNM, with some wide corridors of SPM classes that cut through its center. While some roads do exist here, including the Hole-in-the-Rock Trail, they are not nearly as wide as those shown on the ROS map (Figure 3-16). In order to maintain the integrity of the surrounding primitive lands, these SPM corridors need to be eliminated except where essential, narrowed to

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Adjacent to Canyonlands NP. Two areas east of Canyonlands NP (Davis and Lavender Canyons) were re-evaluated on the basis of public comments (see response to comment 28, National Park Service, comment page 18), and the ROS class was changed from RN to SPM. Other public lands adjacent to Canyonlands NP were found to be evaluated correctly.

The ROS is an inventory tool, and public lands must meet the criteria established in BLM manuals. Manageability to preserve the ROS setting is not one of the criteria used. ROS is only one basis for ORV designations proposed in the draft. The data compiled for the ROS inventory do not support the suggestion that lands adjacent to federal lands managed by another agency should be classified as SPNM.

For the examples given by this comment:

The San Juan Arm. As noted above, a road generates a mile-wide corridor when determining ROS classes. This should not be taken to imply that the road itself is a mile wide.

existing road widths, and ORV use limited to designated roads and trails (see SPM special conditions below).

--Mancos Mesa. A number of management inconsistencies exist here. A large island of the eastern portion of Mancos Mesa is currently designated as RN. The only evidence of human use in this area is a number of roads on the mesa tops that receive infrequent use and are technically closed to public access by BLM. (Also, these were trespass roads that BLM had sought to rehabilitate prior to closure.) . Additionally, all of this area is a BLM Wilderness Study Area and much of it is within BLM's potential wilderness recommendation for Mancos Mesa as described in the Utah BLM Statewide Wilderness Draft EIS.(Volume Y, page 8.) All of this demonstrates the outstanding, relatively undisturbed nature of the area. Clearly, the RN classification is incorrect; the obvious primitive values are inconsistent with the criteria and descriptions of the RN class.(A-57,3-69.)

The RN island is surrounded by mostly SPNM, with a narrow corridor of SPM nearby in the south in Moqui Canyon, and a SPM area to the Northeast in Red Canyon. (No direct access is possible between Red Canyon and Mancos Mesa--they are separated by an 1800 -foot verticle cliff.) As past history of the use of the Moqui Canyon-Mancos Mesa connection has demonstrated, unless this area is managed proactively now to maintain its primitive values, degradation of these values will continue from motorized impacts. The entire area should be designated SPNM at a minimum and managed according to the ROS stipulations provided below to prevent further ORV use and protect its primitive values.

ROS Use Stipulations

The use stipulations developed for the ROS classes are the key to maintaining it's integrity. In our earlier discussion of recreation management in general and the goals and objectives for recreation management under Alternative E, we concluded that Alternative E should work whenever possible to maintain all the ROS classes as they exist now (with above -stated boundary modifications). The use stipulations for ROS classes developed under Alternative E are inadequate to achieve this goal. In order to do so, the following stipulations are at a minimum necessary, and should replace those on pages A-24 and A-25:

--ROS Classes: These special conditions are necessary to ensure that current ROS class designations are maintained throughout the SJRA and are consistent with

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[Comment page 14]

Mancos Mesa. The roads on Mancos Mesa result in an ROS inventory class of RN, regardless of why the roads are there or their status. However, the draft has been revised so that the area would be closed to ORV use to protect recreation values on adjacent P class public lands (see revisions to draft table 2-8 and the map in the proposed RMP and final EIS).

ROS Use Stipulations

BLM is confident that the ROS special conditions developed for alternative E, together with standard operating conditions such as cultural clearances and VRM stipulations (draft appendix A) would be adequate to maintain the ROS classes.

existing BLM ROS class criteria and descriptions. No special conditions have been identified to maintain ROS classes R or U. Under Alternative E, ROS classes R and U would be managed under the standard operating procedures for alternative A, and subject to VRM class IV objectives.

Primitive Class:

--The area will be managed so as to be essentially free of evidence of human use and to maintain an environment of isolation (not more than 10 group encounters per day). Levels of management and use would be aimed at maintaining natural ecosystems. The area would be segregated from mineral entry.

--Surface disturbance will be limited to that which can be reclaimed within one year to visually match pre-existing conditions. All surface disturbance will be subject to VRM class I objectives.

--No surface disturbance from mineral prospecting, exploration, or development will be allowed, to the extent possible without curtailing valid rights. No other type of surface use, motorized access, or development will be allowed.

--Grazing will be licensed at 25 percent of the average of the past 5 years licensed use (1979-1984). New land treatments or range projects will not be allowed. No watershed control structures will be allowed.

--No private or commercial harvest of woodland products will be allowed, except limited onsite collection of dead fuelwood for campfires.

--Cultural resources will be allowed to remain subject to natural forces.

--Only native plant and wildlife species will be introduced.

--Fires will be allowed to burn unless they threaten life or property; nonmotorized suppression methods will be utilized whenever possible.

--This setting will be maintained in the public ownership.

--Recreational use restrictions will be imposed if natural, wildlife, or cultural resources are being threatened.

Semiprimitive Nonmotorized Class:

--The ROS SPNM class area will be managed so as to provide a predominantly natural environment, with limited evidence of human use and to maintaing an environment of isolation (not more than 20 group encounters per day). Levels of management and use would be aimed at maintaining natural ecosystems. The area would be segregated from mineral entry.

--Surface disturbance will be limited to that which can be reclaimed within one year to visually match pre-existing conditions. All surface disturbance will be subject to VRM class I objectives. No surface disturbance from development of mineral leases will be allowed.

--Construction of development projects will be allowed only so long as they are made to blend with the natural character of the land and nonmotorized access is used.

--Grazing will be licensed at 50 percent of the average of the past 5 years licensed use (1979-1984). Facilities necessary to maintain adequate distribution, seasons of use, and grazing systems, will be allowed only so long as they are made to blend with the natural character of the land. New land treatments will not be allowed.

--No private or commercial harvest of woodland products will be allowed, except limited onsite collection of dead fuelwood for campfires.

--Only those cultural resources management activities that blend with the natural character of the land will be allowed.

--Natural fires will be allowed to burn unless they threaten life or property; other fires and all fires in riparian areas will be suppressed; nonmotorized suppression methods will be utilized where possible.

--No motorized access will be allowed.

-- This class will be maintained in public ownership.

--Recreation- use limitations will be imposed if natural, wildlife or cultural resources are being threatened.

Semiprimitive Motorized (SPM) Class:

--The ROS SPM class area will be managed to provide a predominantly natural environment with subtle evidence of human use and to maintain a low concentration of users.

--Surface disturbance will be allowed, but facilities will be required to blend with the natural environment, both while in use and after reclamation. Revegetation will be required to be successful within 5 years. Certain routes may be left for continued access at the request of the BLM. all surface disturbances will be subject to VRM Class II objectives.

--Grazing use will be licensed at 50 percent of the average of the past 5 years licensed use (1979-1984). Facilities necessary to maintain adequate distribution, seasons of use, and grazing systems will be allowed only so long as they are made to blend with the natural character of the land. New land treatments will not be allowed.

--Onsite use of woodland products and noncommercial harvest of dead and down fuelwood will be allowed in designated areas. Commercial or noncommercial harvest of other woodland products will not be allowed.

--Cultural resources management activities will be required to blend with the natural character of the land.

--Natural fires will be allowed to burn unless they threaten life or property; other fires and all fires in riparian areas will be suppressed; suppression activities will be reclaimed to blend with the natural character of the land.

-- The class will be maintained in the public ownership.

--Motorized access will be allowed on designated roads and trails.

--Recreation use limitations will be imposed if natural, wildlife or cultural resources are being threatened, and further access limitations considered.

Roaded Natural Class:

--The ROS RN classification will be managed to provide a generally natural environment with moderate signs of human use and a low-to-moderate concentration of users. Surface disturbance will be allowed, but subject to VRM Class IV objectives. be made to minimize disturbance and blend with the natural environment. Revegetation will be implemented to achieve successful rehabilitation within 5 years. All surface disturbance will be subject to VRM class III objectives for that area (see Figure 3-18).

--RN areas will be open to motorized use.

--Grazing will be maintained at the past 5 year average licensed use (1979-84). All grazing use improvements will be required to blend with the natural character of the land.

--Commercial and non-commercial harvest of woodland products will be allowed.

--Cultural resource management activities will be required to blend with the natural character of the land.

--All minerals disturbances will be required to blend with the natural character of the land.

Special Management Designations for Recreation

In Alternative E, BLM has identified a number of areas as Special Recreation Management Areas (SRMA's) and one as an ACEC for recreational values. SUWA supports these designations, as long as adequate use stipulations are provided. In addition some boundaries need to be adjusted, and at least two additional areas need to receive SRMA designation under Alternative E.

--Dark Canyon ACEC. SUWA supports the concept of an ACEC for the Dark Canyon area, but the boundaries provided in Alternative E are too narrow. The stated goal of the ACEC designation is to protect the "natural values associated with primitive recreation" (A-26). In order to achieve this goal, all of the SPNM and SPM lands that surround the ACEC must be included. These lands are integral to the natural and primitive recreation values of the Dark Canyon area.

--Dark Canyon and Beef Basin SRMA. SUWA supports the concept of SRMA designation for these areas, but the boundaries as outlined in Alternative E are arbitrary and too narrow. A large, contiguous unit of high quality natural and primitive recreation values exists in this area and includes White Canyon and its tributaries, Dark Canyon and its tributaries, and Beef Basin. A variety of recreational use exists in this larger area, the majority at the primitive end of the spectrum, with ORV use predominantly in Beef Basin. It is not uncommon for recreationists seeking primitive experiences to use two or even all three of these areas on the same expedition. The larger area provides contrasting natural environments, relatively undisturbed archaeology, and wildlife sighting opportunities. Vehicle access to a few roadheads provides the ability to cover the area in a relatively short time period. Designation of this area as one large SRMA would provide more cohesion to overall recreational planning and management and allow a more comprehensive approach to resolution of any conflicts that develop. This will be especially important in the future as projected recreational use increases are dispersed from well-known Dark Canyon into surrounding areas with primitive recreational opportunities. (White Canyon was identified by

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Special Management Designations for Recreation

BLM appreciates this support for the SRMAs as presented in the draft. Under the proposed RMP, however, three small SRMAs have been combined under one designation, the Canyon Basins SRMA, in order to facilitate management (see revisions to draft table 2-3).

ACECs are not designated to protect recreation opportunities per se, although they may be designated to protect natural, cultural, or scenic values leading to recreational opportunities.

Dark Canyon ACEC. BLM appreciates this support for the proposed Dark Canyon ACEC. BLM does not agree that adjacent areas are required to protect the integrity of the ACEC. (See appendix H, as revised, for the rationale for selecting the primitive area.)

Dark Canyon and Beef Basin SRMA. While the proposed ACEC includes only the Dark Canyon Primitive Area, the adjacent lands in Beef Basin, suggested in this comment, are within the Canyon Basins SRMA and will be managed for their recreational values in line with the ROS classes present. BLM did not identify the White Canyon area as requiring special management as an SRMA (draft page 3-66). Under the proposed RMP, a portion of the Beef Basin area adjacent to Canyonlands NP, mentioned in this comment, would be managed as an ACEC (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H, and I).

BLM as one of these use dispersal areas in the MSA, 4333-40.)

In order to adequately protect this area, the following stipulations, at a minimum, need to be developed:

> The SRMA contains the full range of ROS classes, although 95% are in P, SPNM, or SPM. The special conditions given below are in addition to those developed earlier in these comments for the ROS classes. Some of this proposed SRMA falls within the Desert Bighorn Sheep Crucial Habitat ACEC. Any special conditions for the ACEC would take precedence. RN lands (5%) within the SRMA will be managed according to SPM class special conditions. No new land treatments will be allowed.

--Indian Creek SRMA. SUWA supports BLM's proposed Indian Creek SRMA but believe Lockhart Basin to the north should also be included. Our primary concern is that ORV use be managed so as to be consistent with adjacent Canyonlands National Park planning (see earlier ORV discussion) and not degrade any of the visual or scenic qualities of the area. (A large portion of the area falls within our proposed Lockhart Basin ACEC for visual resource management.)

As stated in the MSA, for the Indian Creek area:

> "ORV use activity in this area appears to be approaching capacity at this time" (MSA 4333-37).

Proactive management now is crucial. The following management stipulations will provide this:

> --ORV use will be allowed only on designated roads and trails within the SRMA.

--San Juan River. Wild and Scenic River designation is the most appropriate management action for the San Juan River. The San Juan River contains high quality recreation, cultural resources, visual, historic and geologic values. Any one of which qualifies the river for Wild and Scenic designation. In the RMP the San Juan River currently receives heavy recreational use, which is projected to increase. There are no conflicts between the Wild and Scenic Designaiton and other

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Indian Creek SRMA. BLM appreciates this support for the Indian Creek SRMA. In the proposed RMP, the Indian Creek SRMA has been combined with two other areas to form the Canyon Basins SRMA. BLM does not believe that Lockhart Basin requires special management as an SRMA, and this comment offers no data to support a change in this evaluation.

The laws regulating management of Canyonlands NP (primarily the NPS Organic Act) do not address the management of public lands adjacent to NPS units; neither NPS laws nor FLPMA require the Secretary to manage public lands to protect park values. BLM planners are under no obligation to protect values on NPS lands, just as NPS planners are not required to protect public land uses.

Under the proposed plan, a portion of the Indian Creek basin adjacent to Canyonlands NP would be managed as an ACEC (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H, and I).

San Juan River. The draft recommended (page I-8) that NPS study the San Juan River for wild and scenic river status; this has been carried into the proposed RMP (see revisions to draft page 2-7).

uses in the area.

Clearly, Wild and Scenic designation is the highest and best use of the San Juan river. BLM ignores any management responsibility they have to promote this designation, despite the fact that they are the primary manager of the river corridor. BLM should recommend Wild and Scenic designation in the RMP, and work to resolve any potential conflicts with Glen Canyon National Recreation Area as required by the planning process.

In the interim, we support BLM's proposed SRMA for the San Juan River, if additional strengthened stipulations are incorporated to protect its unique values, as follows:

> -- All surface disturbances will be required to meet VRM class I objectives. Recreational use limitations will be imposed if natural, scenic, and cultural resources are being threatened.

--Montezuma Creek SRMA. SRMA designation for the Montezuma Creek area was not carried forward from alternative C into Alternative E. No reason for this is stated in the RMP; this decision appears arbitrary and capricious. As stated in the MSA:

> "Montezuma Creek contains a wealth of archaeological resources on both private and public lands which would increase the attractiveness of this potential SRMA" (MSA 4333-22).

> "The loop [in Montezuma Creek] provides recreationists with undeveloped camping, hiking, and archaeological viewing in a highly scenic RN setting" (MSA 4333-21).

The MSA further states that Montezuma Creek exhibits increasing signs of recreational use and is in need of SRMA designation to recognize and manage current and projected heavy use (MSA 4333-45 and 4333-50). All of this clearly demonstrates the need for SRMA designation and the area's qualification for designation under the criteria for SRMA's, which include areas requiring special management to "ensure their preservation" (3-66).

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The San Juan River adjacent to SJRA is administered jointly by BLM and NPS (draft page 1-10).

The proposed special conditions for the San Juan River SRMA call for management under VRM class I (draft page A-25).

Montezuma Creek SRMA. BLM believes that designation of Montezuma Creek as an SRMA is unnecessary at this time due to the minimal level of recreational use occurring there. Under the preferred alternative, part of the northern end of the Montezuma Creek SRMA proposed under alternative C became the Pearson Canyon SRMA (draft figures 2-9 and 2-11). The southern half of the Montezuma Creek SRMA proposed under alternative C falls within the Alkali Ridge proposed ACEC under the preferred alternative (draft figures 2-5 and 2-9). Under both of these proposed designations, vehicle use would be limited and surface disturbance would be minimized (draft appendix A). Recreational use in SJRA will be monitored over time (draft appendix B); if use patterns change, the RMP can be changed accordingly (draft page A-30).

Along with SRMA designation for this area, the following stipulations are necessary at a minimum to provide for adequate protection of the recreational, scenic, and cultural resources present:

> The SRMA falls within the RN ROS class and would be subject to the special conditions developed for the RN classs. The special conditions below are in addition to those for the RN class and take precedence. All surface disturbance would be subject to VRM class II objectives. Recreation, including ORV use limitations will be imposed if scenic, cultural or recreation resources are being threatened.

-- The Nokai Dome-Mancos Mesa Red Canyon Area. From U-95 South/Southwest to Nokai Dome and Mikes Canyon, from the Red House Cliffs west to the NRA boundary.) This area was not identified by the BLM for SRMA designation. It warrants designation as such for three key reasons:

--The area contains multiple recreation opportunities. The majority of the ROS area falls within P, SPNM and SPM ROS classes. The proposed SRMA contains the BLM-endorsed Mancos Mesa WSA. The Hole-in-the-Rock Trail offers ORV use in a highly scenic setting and exploration into a significant part of the region's recent cultural history.

Mancos Mesa has been identified as one of the areas to which P recreation use will be dispersed (MSA 4333-40). It is likely that many of the other P class areas will also receive such use, including Castle Creek, Mike's Canyon, Nokai Dome and other lands adjacent to the NPS-proposed Wilson Mesa wilderness. The Hole-in-the-Rock Trail and Red Canyon have both been identified as areas to which increased ORV use will be dispersed (MSA -4333-40).

--While not as rich as Grand Gulch and Cedar Mesa to the east, cultural resources are not uncommon throughout the proposed SRMA. Some locales have high concentrations of cultural resources, such as Lake and Moqui Canyons, as documented in the study "Prehistoric Cultural Resources of Lake and Moqui Canyons, Glen Canyon National Recreation Area: Report and Recommendations" (Alan R. Schroedle, University of Utah, October, 1976). This report documents the importance of the area to understanding the interrelationships between branches of the Anasazi culture as well as earlier Archaic habitation of the area, and the severity of vandalism damage to the cultural resources present (pages 48-50). The MSA echoes these comments in its statement that "particular management consideration is needed to ensure adequate protection" of the cultural

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Nokai Dome - Mancos Mesa - Red Canyon Area. BLM believes that designation of this area as an SRMA is unnecessary at this time due to the minimal level of recreational use occurring there. Recreational use in SJRA will be monitored over time (draft appendix B); if use patterns change, the RMP can be changed accordingly (draft page A-30).

The special conditions for management of P and SPNM ROS class areas, as well as those developed to protect bighorn sheep, should provide adequate protection for recreation-related values in the area.

resources present in this area (MSA 4331-24).

-- Desert Bighorn Sheep year-long and crucial habitat both fall within the boundaries of the SRMA. Much of our proposed ACEC for cultural resources Desert Big-Horn Sheep is within the SRMA. As discussed under the wildlife section of these comments, special management attention is needed for this crucial habitat.

When the larger picture of recreational, cultural and wildlife habitat resources and the inherent conflicts their use and protection create, is examined, it is clear that special management attention is needed for this area. This is especially true given the projected increases in recreation use for the SJRA. This proposal clearly meets the criteria for SRMA designation outlined on page 3-66.

In addition to this designation, the following use stipulations are the minimum necessary to insure adequate protection of the varied resources:

> The SRMA has P, SPNM, SPM, and RN ROS classes within it. Management would be based on the special conditions provided for the ROS classes. Portions of the Desert Bighorn Sheep Crucial Habitat ACEC fall within the SRMA; the special conditions provided for the Crucial Habitat ACEC are in addition to those for the ROS classes and take precedence within the SRMA.

WILDLIFE

General Discussion

In the MSA, BLM clearly identifies the need to focus management attention on wildlife habitat.

> "Public demand for big game is increasing every year. As the human population within our nation continues to increase, it will become more difficult on a nation-wide basis to meet the future demands of consumptive uses of wildlife" (MSA 4350-48).

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Wildlife: General Discussion

BLM agrees that management attention needs to be given to wildlife habitat.

"The future demands for wildlife habitat are expected to increase. The capability of the resource area to meet the increasing demands on wildlife is questionable. As future demands for other land uses increase, more pressure will be brought against wildlife habitat. In maintaining a balance of uses, it may be possible to manage wildlife habitat at a level that will produce sustained yields of wildlife populations" (MSA 4350-47).

The MSA further states that management should consider the cumulative effects of a variety of impacts on wildlife habitats, including grazing:

"A critical threshold has not been determined for wildlife species in the SJRA. Although it is possible that one type of activity could cause a significant adverse impact to wildlife habitat, it is more likely that the cumulative effect of combined change agents would, over time, cause a deterioration of habitat. Change agents could be natural (e.g., disease, or drought), but are more likely to be grazing or human activities" (MSA 4350-49-50).

BLM fails to adequately acknowledge the identified need for focused management on wildlife habitat in the preferred Alternative E in the RMP. Despite its authority to do so under numerous laws, executive orders, regulations, etc, BLM has ignored internal and external recommendations for special management designation and protection stipulations to provide effective protection of wildlife habitat from cumulative impacts. Thus, BLM has failed to adequately protect wildlife habitat for current and future demands in numerous settings. This is contradictory to BLM's mandate under FLPMA, sec 102(a)(8), 103(a), and 202(c)(3 and 5).

Three key examples of this are:

1. BLM's goal and habitat management objectives for Alternative E protect only "certain" wildlife habitats, and show a clear preference for grazing use over wildlife habitat.

2. No special management designations have been carried forward into Alternative E, despite substantial evidence that supports these designations.

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Wildlife habitat will be managed in accordance with all applicable laws, executive orders, and regulations pertaining to its use (draft page 1-10 and 2-8). The preferred alternative identified the level of management needed to protect crucial habitat areas and applied these special conditions to other resource uses (draft appendix A). The effect of the special conditions is included in the impact analysis (draft page 4-2).

3. Use stipulations developed under Alternative E are inadequate to protect some crucial habitats from the effects of cumulative impacts.

Examples of these inconsistencies will be discussed below by wildlife habitat, along with suggestions to correct these problems including the minimum special management designation and use stipulations necessary for their protection.

Goals and Habitat Management Objectives for Alternative E

The Goals and Habitat Management Objectives for Alternative E show a clear preference for grazing over wildlife. The goal for Alternative E:

> "is to manage public lands for multiple use of public resources, as long as grazing use is maintained at existing levels...certain wildlife habitats are protected..." (2-15) (emphasis added)

The Habitat Management Objectives for Alternative E clearly reemphasize this grazing preference.

> "To alter management of wildlife habitats so as to protect certain riparian areas and critical big game habitats...only so long as...livestock use is accomodated."(2-58)(emphasis added)

Not only is this a contradiction of FLPMAs definition of multiple use [sec 103(c], but again the word "certain" appears. This would allow BLM to selectively manage only a few wildlife habitats in preference to grazing, and then with stipulations that do not provide adequate protection of these habitats. These goals and objectives fail to acknowledge the serious degradation of wildlife habitat from excessive livestock use historically, despite discussions of this by both BLM and others. (Specific examples of this are provided below.) Consideration of this degradation is especially important since under Alternative E BLM has stated that its resolution of the livestock management issue is to "continue current management."(2-11).

Additonally, under Alternative E one of the "trade offs" for wildlife habitat management would be to "not identify target populations" (2-16)., or the UDWR established prior stable numbers and population goals for big game herds. It appears that the reason for this is that in order to achieve

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Goals and Habitat Management Objectives for Alternative E

The draft did not indicate that any areas exist where livestock grazing conflicts with wildlife, or degrades wildlife habitat, after appropriate mitigation measures have been applied (such as grazing exclusions, limitations on land treatments, and application of grazing management systems). Therefore, no reduction in grazing is warranted, and grazing is recommended to continue at current levels in alternative E.

The word "certain" as used in the draft in relation to wildlife habitats refers to the crucial habitat for bighorn sheep, antelope, and deer (draft pages A-21 and A-22). Only these "certain" wildlife habitat areas were identified as requiring special protection (MSA section 4350; draft pages 3-41 through 3-49).

these populations there must be "an increase in the various habitat components, " (3-41) which is not encouraged under the goal and habitat management objectives for Alternative E. Also, in the MSA, BLM misrepresented the failure to currently meet these goals. The antelope herd was stated to be only "33% below UDWR goals" (MSA 4350-46), when in reality the present herd population is only 13% of or 87% below the goal (3-42). The DBHS herd was stated to be only "22% below UDWR goals" (MSA 4350-46), when in reality the present herd population is only 22% of or 78% below the goal. (3-42) BLM has not clearly stated the cause for their failure to meet these goals under current management nor why it has chosen to make no attempt to change this through Alternative E. This is reflected in the goal and habitat management objectives for Alternative E, and is probably a partial result of conflicts with grazing use of crucial wildlife habitats.

The Goal and Habitat Management Objectives for Alternative E must be rewritten to provide more balanced and truly multiple use management guidance, one that gives at least equal emphasis to wildlife habitat as to livestock use.

Desert Bighorn Sheep Crucial Habitat

BLM and Utah Department of Wildlife Resources (UDWR) have identified 329,750 acres of desert bighorn sheep crucial habitat within the SJRA. In the MSA, BLM recognized the importance of this crucial habitat and the need to designate this area as an ACEC for the following reasons:

> "These areas have specific natural value as lambing and rutting areas for bighorn sheep. The values need protection from conflicting land uses that could eliminate or degrade their crucial habitat values.
>
> "Desert bighorn sheep require specific areas with steep, rugged terrain for escape cover and with adequate forage and water. This area is important because it provides for the largest population of desert bighorn sheep in Utah. Bighorn sheep are a nationally important species of wildlife" (MSA 4350-64).

In their final General Management Plan, Glen Canyon National Recreation Area also recognized the importance of this crucial habitat:

> "The desert bighorn sheep is the area's single most important big game species.

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UDWR's prior stable numbers result from that agency's estimates of maximum wildlife carrying capacity (draft glossary) and do not necessarily represent a population level that can be attained. These estimated populations could be achieved only under optimal natural conditions (such as weather or health) and if all other management options were resolved in favor of wildlife habitat management.

Studies consulted by BLM [King and Workman, 1983] did not indicate an existing conflict between livestock grazing and big game species (draft page 3-58). BLM's data do not indicate that conflicts between grazing and wildlife habitat management exist within SJRA or have adversely affected existing herd populations.

Desert Bighorn Sheep Crucial Habitat

The MSA identified areas for consideration as preliminary potential ACECs. It did not establish a need to designate any area as an ACEC.

The Glen Canyon area, with its tributary side canyons and adjacent plateaus and mesas [many within the SJRA], supports some of the last relic bighorn herds, which were once abundant throughout the state. In fact, the Red, White and Gypsum Canyon regions, where the bighorn are definitely known to occur, are among the few areas in Utah where the species is currently maintaining its numbers" (GCNRA, Final GMP, page 33).

The MSA further identified mineral, oil and gas, and livestock uses as threats to these crucial habitat areas (MSA 4350-64). The RMP repeats these statements and also alludes to recreational use as potentially having adverse impacts on desert bighorn sheep crucial habitat (3-42).

The ACEC recommendation was not carried forward into any of the alternatives as it was felt that development of use stipulations to mitigate impacts would be adequate to protect the crucial habitat (A-72). The only land use activities with impacts on crucial habitat addressed through stipulations in Alternative E were mineral, oil and gas, and grazing; recreation use impacts were not addressed. Those addressed are not adequate.

Outside BLM's own discussions, implicit support for ACEC designation and direct support for highly protective stipulations does exist. A series of reports from 1981 to 1984 (commissioned by BLM) entitled "Ecology of Desert Bighorn Sheep in Southeastern Utah," discuss a number of the conflicts between desert bighorn sheep and other land uses. In their discussion of livestock and bighorn conflicts, the majority of the researchers cited in the reports jointly arrive at the conclusion that:

> "Livestock have had a major impact on the desert sheep populations in Utah through competition for space, alteration of vegetative consumption, and introduction of disease" (1981-page 20).

The 1981 report continues:

> "Gallizioli (1977) has gone so far as to suggest that if bighorn sheep are to survive, that cattle grazing and other livestock problems must be solved. He further suggested that cattle numbers be sharply reduced in historic bighorn habitats" (1981-page 14).

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BLM has revised appendix H of the draft to clarify the rationale for not considering crucial wildlife habitats as potential ACECs. The seasonal stipulations presented in the preferred alternative would be applied to any surface-disturbing use, including ORV use (draft taable 2-8. Draft table S-1 incorrectly showed seasonal use conditions under alternative D instead of alternative E; no seasonal conditions were developed under alternative D.

"Desert Bighorn Council technical staff (1980) expressed concerns about competition between desert bighorn sheep and livestock. They recommended to the degree possible livestock grazing on the public lands should be phased out whenever there is direct or potential competition with bighorn sheep" (1981-page 17).

The 1981 report lists special conditions recommended by the Council where sheep and livestock "must exist in close proximity." These include limits on grazing use (1981-page 17).

The Glen Canyon National Recreation Area final General Management Plan also identified grazing and bighorn conflicts as one of the keys to population decline:

"The primary cause of the reduction in numbers of sheep in Utah is the loss of habitat, over-utilization of range by domestic livestock... (Irvine 1969, Wilson 1968)" (page 33).

In their discussion of mining-bighorn sheep conflicts, the same "Ecology" reports cite further Council recommendations:

Management recommendations with respect to mining in bighorn sheep habitat have been made by the Desert Bighorn Council Technical Staff (1980). Their recommendations suggest that mineral exploration should be rigidly controlled to minimize destruction and insure rehabilitation of habitat. They recommend that the agencies in authority should require filing and approval of a developmental and operational plan before permission to proceed be given. The plan should also provide for mitigation of impacts to desert bighorn habitat. They also suggested that no water sources be disturbed or usurped by mining interests. Critical areas such as lambing grounds, water holes, etc., should be precluded from mining" (1981-page 24).

This call for an "operational plan" is implicint support for ACEC designation and the fact that plans of operations are required under such designations as specified in the RMP (A-75).

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BLM is confident that the seasonal conditions developed under the preferred alternative would be adequate to protect crucial bighorn sheep habitat. If plan monitoring (appendix B) indicates unsatisfactory results, the RMP special conditions could be changed.

Last, in their discussion of recreation-desert bighorn conflicts, these same "Ecology" reports cite a number of researchers that point to the conclusion that recreational disturbances (from hikers, backpackers, motorized vehicles, hunters, river runners, aircraft) will cause desert bighorn to vacate habitat and can be correlated to decreases in desert bighorn populations; and, that this will become an increasing problem as recreational use of bighorn sheep habitat rises (1981-pages 26-30). The 1981 report again cites the Desert Bighorn Council Technical Staff:

> "The Desert Bighorn Council Technical Staff (1980) recommended that recreational activities should be eliminated or regulated where they pose a threat to bighorn" (1981-29).

The report goes on to cite Council recommendations on recreational use stipulations that include limits on hiking and camping locations and numbers, new trail locations and rerouting old trails, ORV use, boat and aircraft use (1981-page 29-30).

Clearly the ACEC designation identified in the MSA should have been carried forward into Alternative E, consistent with the goals and objectives of Alternative E. By failing to do so, the BLM ignored the following:

> --recreational impacts on desert bighorn crucial habitats as part of the cumulative impacts that need to be mitigated, especially given projected recreation use increases in this region;
>
> --that the combined conflicts between recreation, mining, oil and gas, livestock and the crucial desert bighorn habitat require special management designation to protect the habitat, as required in FLPMA section 103(a) and 202(c)(3);
>
> --livestock impacts on DBHS and the need to limit livestock use as outlined above by BLM and others. [This is especially important since all of the crucial habitat falls within range placed in the "improve" category by BLM, which implies the present range condition and range management is unsatisfactory.(A-47, Allotments 4815, 6833, and 6837 on Table A0-1, A-109). Range that cannot meet livestock needs will undoubtedly not be able to meet Desert Bighorn sheep needs]

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Placing an allotment in the I category does not imply unsatisfactory range condition or range management (see also the response to comment 3, National Wildlife Federation, comment page 8 on this topic), nor does it imply that an allotment cannot meet livestock and wildlife needs. Grazing allotments in the I category in bighorn sheep crucial habitat can be improved for both livestock and wildlife use; that is one of the reasons they are in the I category (draft appendix D).

--that based on its own discussion of the values of the desert bighorn crucial habitat in the MSA and RMP, the habitat meets BLM criteria for ACEC designation as outlined in 43 CRF 1610.7-2 (a) (1 and 2);

--the full implications of both the "Ecology" reports and the included Council staff recommendations, as they pertain to special management designation and use stipulations, especially in regards to grazing and its impacts on desert bighorn habitat.

Additionally, the stipulations provided in the preferred alternative are not adequate to protect the crucial habitat. In order to do so, the following changes and/or additions must, at a minimum, be made:

--The crucial bighorn sheep habitat contains ROS classes P, SPNM, SPM, and RN. The special conditions below are in addition to those listed for ROS classes (as outlined under Recreation in these comments) and take precedence.

--The crucial habitat shall be managed as oil and gas leasing category 2, the identified mesa tops as category 3.

--No increases in grazing use will be allowed in the crucial habitat. (Page 4-66 of the RMP states that "livestock use will increase somewhat in the crucial habitat areas, which could increase competition for forage on winter range, possibly decreasing bighorn populations.") Also, where it is impractical to effectively limit grazing use due to topography or other reasons, elimination of grazing use must be considered.

--No land treatments will be allowed in crucial habitat areas.

--All fence construction must meet standards considered safe to bighorn sheep.

--ORV use will be limited to designated roads and trails only. Additional ORV use limits will be

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BLM is obligated to apply the least-limiting level of restriction to oil and gas leases that is necessary to resolve resource conflicts (76 IBLA 395 (1983)). BLM does not agree that closing crucial wildlife habitats to lease or to surface occupancy would meet this requirement, or that livestock reductions or closures are necessary, or that ORV limitations (beyond those developed in the RMP/EIS) are needed, or that conflicts not identified in the draft require this level of management to effect their resolution.

imposed if the crucial habitat is threatened by such use.

Crucial Deer Habitat

In the MSA, BLM identified crucial deer habitat (deer winter range) as a potential ACEC for the following reasons:

> "These areas have high concentrations of deer during the winter months and need to be protected from land uses that could degrade their crucial habitat values. Deer require specific areas with vegetation for use as forage (browse and forage) and larger trees for thermal cover. Terrain can vary from flat ground to steep hillsides. These areas are important because they are occupied by large numbers of deer during the winter. Deer are a nationally important species of wildlife" (MSA 4350-67).

The MSA also identified both mining and livestock uses as having conflicts with deer crucial habitat, and recommended the following stipulations be developed for the ACEC:

> "Change the season of livestock use on several allotments. Develop grazing systems to make more winter and spring forage available to deer on several allotments. Develop oil and gas leasing category stipulations that will protect deer habitat winter ranges from 12/15 to 4/30" (MSA 4350-53 and 4350-69).

The only part of these recommendations carried forward into the RMP were the oil and gas category stipulations.

While BLM failed to carry forward a proposed ACEC to protect the crucial deer habitat, all of the recommended stipulations must at a minimum be carried forward into Alternative E, including the grazing use stipulations. The failure to do so ignores the MSA documentation of competition between livestock and deer in this crucial habitat.

> "...competition with livestock limits use of winter browse and early spring grasses and forbs" (MSA 4350-46).

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Crucial Deer Habitat

As noted earlier, the MSA identified preliminary potential ACECs. Appendix H of the draft has been revised to clarify the rationale for not carrying crucial deer habitat forward into the draft.

The draft identifies adverse impacts that could occur to deer populations as a result of existing competition between deer and cattle (draft page 4-15). Under alternative E, seasonal conditions on any surface-disturbing activity, changes in season of use, and exclusion of land treatments in parts of the crucial habitat would result in an increase in deer numbers (draft page 4-67).

Season of use modifications for livestock would be made in AMPs under alternative E (draft appendix U). Grazing would not be eliminated during winter and spring on deer habitat, but would be rotated so that not all deer habitat in an allotment would be grazed every year at the same time. This would allow deer exclusive use of some pastures and would improve forage density and vigor by allowing rest from livestock use.

"Increasing competition between deer and livestock for winter browse and early spring grasses and forbs is expected as both deer and livestock populations (using the same areas) increase" (MSA 4350-49).

At a minimum,the following stipulations must be added to deer winter range stipulations for Alternative E:

--No livestock use should be allowed from 12/15 to 3/31.

[Note: There is a discrepancy in acreage figures identified as deer crucial winter range in the RMP (197,550 acres) and the MSA (152,500 acres). These stipulations should apply to whichever of the two numbers represents the correct acreage.]

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Antelope Crucial Habitat

A number of discrepancies are apparent in BLM's analysis of conflicts and management opportunities in relation to the identified antelope crucial habitat. The MSA states that:

"competition between livestockand antelope for forage is not apparent. Predation and lack of water do limit population size." (MSA 4350-46)

And yet, the MSA goes on to identify crucial antelope habitat as having "potential to qualify for ACEC designation to protect wildlife habitat values" (MSA 4350-62) for the following reasons:

These antelope lambing grounds need to be protected from conflicting land uses that could eliminate or degrade their significant habitat values. Antelope require specific areas with forage and water and with terrain that enables them to detect and avoid approaching predators. This area is important because it is the only antelope habitat in the resource area.

"Livestock grazing within the lambing areas removes forage (grasses and forbs) that is needed by lactating does to maximize fawn growth so that they can avoid

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This comment notes a discrepancy between acreages given for crucial deer habitat in the MSA and the draft. Both figures are estimates; the draft reflects the more current estimate.

Antelope Crucial Habitat

Some conflict currently occurs between cattle and antelope for spring forage and water (see revisions to draft page 3-58). It is difficult to demonstrate that conflicts exist between livestock and antelope in SJRA because the antelope population has been so small for the past several years that conflict patterns have been difficult to identify. As antelope numbers increase, either naturally or through transplants to the vicinity (such as occurred in the neighboring Grand Resource Area in early 1987), the conflicts believed to be present would become more apparent.

capture by predators."

"Mineral and oil and gas activities and livestock grazing threaten the special wildlife values"
(4350-62).

The MSA also states that competition between antelope and livestock for winter food is expected to increase (MSA 4350-48). It goes on to recommend stipulations for the ACEC:

"Change season of livestock use to remove cattle by May 31st (to protect lambing season). Develop an oil and gas leasing stipulation to protect antelope fawning areas from May 15 to June 30" (MSA 4350-62).

The RMP repeats the statement about no obvious competition between livestock and antelope within the habitat (3-42). It does not mention any protective stipulations to mitigate livestock impacts on the habitat. And yet the RMP goes on to say that:

"The habitat area is relevant because it is used by the only population of antelope in SJRA. Pronghorn antelope are nationally recognized as an important species of wildlife. The animals could be disturbed by development activities or grazing pressure" (A-72).

It appears that BLM is at least confused about the potential for resource conflicts within antelope habitat, and at worst specifically ignoring the potential significance of livestock impacts specifically. While BLM failed to carry forward into Alternative E their ACEC designation, it must protect antelope crucial habitat. Unless BLM can demonstrate conclusively that no livestock-antelope conflicts exist, the following stipulations must at a minimum be added to and/or changed for the antelope fawning and crucial habitat areas under Alternative E:

-- The antelope crucial habitat falls within the ROS RN class. The habitat will be subject to the special conditions for the SPM ROS class (as revised under the recreation section.) No grazing use will be allowed during the lambing season (or between 4/1 and 6/30).

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Generally, grazing occurs annually through April 30 in allotments with antelope, so there is no grazing during May and June. When spring use is rotated in pastures within an allotment, some antelope fawning range will be ungrazed by livestock every year during April. This will be provided for in AMPs and is considered sufficient to protect antelope fawning grounds from conflicts with livestock (draft appendix U).

BLM does not agree that the draft is "confused" regarding the potential for resource conflicts within antelope crucial habitat areas. Under the preferred alternative, seasonal restrictions would be applied to all surface-disturbing activities and to ORV use within the crucial habitat areas.

Riparian Habitat

Riparian Habitat provides an opportunity for a number of resource values--recreational, wildlife, cultural--to coalesce into a unique environment for the deserts of the southwest. The cool water and shade provide rare recreation opportunities and support big game and endangered species habitat. The Anasazi often made their homes in or near the present day habitat. Reluctantly, BLM acknowledges that they have little hard date to quantify the condition of this unique habitat.

> "The condition of the riparian habitat has not been measured throughout the resource area." (MSA 4350-11)

> "The extent of habitat losses has not been quantified." (MSA 4350-50)

Yet BLM also states that:

> "It should be noted that riparian areas in good to excellent condition [relatively undisturbed] support far greater population and far more species of wildlife than do similar areas in poor condition."(MSA 4350-11, 3-49)

> "Because riparian and aquatic habitats occur only under specialized conditions, the demand is concentrated, and the capability of the habitat to renew itself is limited. Under constant use pressure, as is now occurring in certain areas, the quality of the riparian or aquatic habitat degrades significantly." (MSA 4350-44).

Despite the unknown condition, delicacy, and uniqueness of this environment, BLM has done little to protect it under Alternative E. This is a gross error that fails to acknowledge the numerous values of this unique environment.

The MSA went so far as to designate approximately 38,400 acres (based on a corridor .13 miles or approximately 660 feet wide) as an ACEC to protect the wildlife values of this habitat. (MSA 4350-65). It identifies conflicts between these values and ORV use, mineral and oil and gas exploration and development, and grazing activities.(MSA 4350-65).

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Riparian Habitat

Under alternative E, special conditions would be applied (draft page A-20) to any activities taking place within a riparian area, including ORV use, mineral operations, and oil and gas leasing. Conflicts between grazing and riparian management would be addressed at the activity plan stage through an AMP (draft appendix U).

As noted earlier, the MSA did not designate ACECs.

Not only did BLM fail to carry forward into Alternative E these riparian habitats as ACEC's, but there is also a blatant discrepancy between acreage identified as in need of protective stipulations in the MSA and all alternatives in the RMP, including Alternative E. As stated above, the MSA identified 38,400 acres for protection based on a corridor .13 miles or 660 feet wide. Yet the RMP uses a corridor only 25 feet wide for a total of 1500 acres to be protected (A-20). Nowhere in the RMP does it state the reason for cutting the corridor width and total acreage by over 95%. This appears to be an arbitrary and capricious decision.

Obviously BLM needs to define a more reasonable corridor width and total acreage to be protected. The corridor width should accommodate fluctuations in topography and local environment, and should be expanded to realistically reflect the complete riparian environment. ACEC designation for this habitat must be considered as well. The stipulations outlined in Alternative E should apply to this expanded corridor, and should, at a minimum have the following additions to guarantee protection of this resource:

-- No land treatments will be allowed. No wood cutting or gathering will be allowed.

VISUAL RESOURCE MANAGEMENT

General Comments

Visual resources are one of Utah's most prized possessions. The unique, dramatic and varied scenery attracts visitors from around the world. The primary results of a recent study sponsored by the Utah Tourism Research Consortium concludes that "tourists visiting Utah are most impressed with the state's scenic beauty" and that "50% of the visitors said Utah was their primary destination or final destination" (The Daily Spectrum, St. George, Utah, 10/9/86).

The SJRA is rich in these visual resources: it contains some of the most undisturbed scenic values on the Colorado Plateau. From alpine peaks to deeply dissected canyons, the SJRA's

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As noted in this comment, the MSA used a riparian corridor width of 660 feet (draft page A-61, A-73) and the draft (page A-20) used a narrower corridor width of 25 feet. The narrower width was used because of a consensus of the RMP team staff specialists that 660 feet (one-eighth of a mile) was too wide; the majority of riparian areas in SJRA are narrow (10 feet or less) ephemeral streams (draft page 3-36). After reviewing public comments, the corridor width used in the proposed RMP and final EIS has been changed to 100 feet, and the total acreage to 6,000 (see revisions to draft tables S-1, 2-7, 2-10, page 3-49, table 3-6 and chapter 4).

The riparian special conditions would be applied wherever actual riparian conditions were encountered; the special conditions would not apply to areas within the 100-foot corridor that were not riparian, and areas outside the corridor that were riparian would have the special conditions applied. The corridor and corresponding acreage were developed to estimate environmental effects in this EIS. The text of the draft has been changed to clarify this (see revisions to draft appendix A).

As discussed in draft appendix H, BLM considered ACEC designation for the riparian corridor but did not find that the area warranted consideration as a potential ACEC under the criteria given in manual section 1617.8. Appendix H has been revised to clarify the rationale for not considering the area further.

This comment suggests additional conditions for use of riparian areas. Land treatments such as seeding and transplants of cuttings may be useful in protecting riparian areas from erosion and hastening recovery of vegetation. Accordingly, this practice should not be excluded from riparian areas. Exclusion of wood cutting in riparian areas in SJRA is considered to be a moot point. Fuelwood harvest and Christmas-tree cutting is limited to pinyon and juniper species, and post cutting is limited to juniper (draft page 2-5); virtually no pinyon or juniper grow within the riparian corridors defined in the draft because these trees do not tolerate riparian conditions.

Visual Resource Management: General Comments

BLM agrees that visual resources are important in SJRA.

BLM appreciates the commentor's bringing to our attention the study by Utah Tourism Research Consortium; the text of the draft has been revised accordingly (see revisions to draft, page 3-30).

"...spectacular scenic value lies in the area's exposed colorful rock layers, rugged and broken terrain, and naturally sculpted sandstone formations such as bridges, arches, and pediments" (MSA 4333-57).

The variety of scenic values, from the sweeping vistas across the plateaus to the narrow intricacies viewed from a canyon bottom, is tremendous. These unique and outstanding values have been recognized by BLM and numerous other agencies and studies. Yet, in the preferred Alternative E, BLM fails to fully recognize these resource values and provide adequate protection for them. Some key examples of this failure are:

--The management objectives for visual resources under Alternative E are not strong enough to provide adequate management guidance for protection of these resources.

--Few special conditions have been developed to adequately guide management of visual resources in Alternative E. Those developed for ROS classes protect some of the visual resources, but as a whole are inadequate.

--No special designations have been developed in Alternative E to provide management focus on the need to protect visual resources from conflicting land uses.

This lack of adequate proection ignores the full implications of reccomendations for visual resource protection from both outside BLM and BLM's own identification of this need in the MSA. This is in violation of FLPMA, sections 102(a)(8) and 103 (a), which provide for scenic resource protection.

The following is a detailed analysis of these inadequacies along with the minimum actions necessary to correct them.

Visual Resource Management Objectives Under Alternative E

The SJRA contains unique, outstanding and irretrievable visual resources. Support for this and the concomitant management actions necessary to protect these visual resources are demonstrated in the U-95 Scenic Corridor Study, the drafted Grand Gulch Plateau Management Plan, the Grand Gulch

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Based on a review of public comments on the draft, BLM has revised the management prescriptions in the proposed RMP to include special designations on additional areas to protect visual resources (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). Specifically, the proposed RMP proposes ACEC designation for Indian Creek, the Highway Scenic Corridor, Butler Wash, and the Valley of the Gods area within Cedar Mesa, to recognize and protect scenic resources. Additionally, other special conditions on use, such as for P ROS class areas, would serve to protect scenic values in other areas.

Plateau Interim Management Plan, and BLM's own discussion in the MSA of the SJRA's scenic values. They all support the conclusion in the MSA that:

> "To guarantee sustained yield of the visual resource while meeting future demands, management must adhere strictly to the VRM class objectives. Only those projects that meet objectives could be approved" (MSA 4333-65).

> "If objectives are repeatedly not met, then the scenic qualities will be substantially reduced and the VRM class lowered .... Lowering of the VRM class is inconsistent with the BLM's policy of protecting visual values."(MSA4333-57).

Yet the management objectives for visual resource management under Alternative E do not adequately acknowledge the full implications of these statements. The objectives would, in the name of multiple use, simply seek to "minimize adverse impacts while allowing land use activities to occur" (2-57, Table 2-5). This is meaningless and in spite of despite BLM's acknowledgement in the MSA that all land use actions causing surface disturbance adversely affect visual resources, and

> "...include, but are not limited to, fences, pipelines, chainings, reservoirs, mining operations, powerlines, roads, oil and gas developments, and seismic activities. The last three listed above probably have the most significant adverse impacts on the visual qualities of the area, and their influence is likely to continue" (MSA 4333-57).

Given this, in order to adequately protect visual resources as required under FLPMA, stringent restraints must be placed on other "multiple uses" of the SJRA. This is especially important when the nonrenewable, irretrievable nature of significant visual resources, compared to surface disturbing uses, is considered. The definition of multiple use in FLPMA section 103 (c) clearly provides for such management action. The management objectives for visual resources under Alternative E need to be rewritten to reflect this and to effectively guide management in this direction. Otherwise, the RMP fails to adequately address the need to proactively manage for scenic and visual qualities.

At a minimum, the management objectives for visual resources should seek to minimize adverse

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Visual Resource Management Objectives under Alternative E

Based on this comment, BLM has reviewed management objectives for visual resources management. The management objectives have been strengthened for alternatives A and E by incorporating language from BLM VRM manuals (manual section 8400) (see revisions to draft table 2-5).

The proposed RMP places restraints on multiple uses of the public lands in SJRA where necessary to protect visual resources that were felt to be at risk (draft appendix A).

visual impacts by requiring all surface disturbing actions to meet the VRM class objectives for the locale within which the disturbance will be located.

Special Conditions for Visual Resource Management under Alternative E

Under Alternative E, no special conditions have been developed for visual resources per se, beyond the standard operating procedures currently used under Alternative A. These only address how to minimally clean up the after-effects of surface disturbance (including road construction) and are not adequate to protect visual resources. To some extent, additional special conditions to protect visual resources have been developed for the ROS classes, as well as a few other specially designated areas. These conditions are also inadequate to meet the above restated objectives.

While the acreage figures discussed on Page 4-71 appear to demonstrate a substantial increase in visual resource protection, the increases are based on the inadequacies of the original visual resource inventory. (Fig3-18, 3-83). This inventory grossly underestimated the scenic qualities and visual sensitivity of huge portions of the SJRA. Examples include:

--The original inventory only designated BLM's Dark Canyon ISA and Grand Gulch ISA as VRM Class I, but none of the other P or SPNM lands within the SJRA.

--It failed to acknowledge, through VRM Class I designation,the inherent outstanding scenic values ofmany of BLM's WSA's such as Mancos Mesa, Pine Canyon, Sheik's Flat, Buttet Canyon, Mule Canyon,, Road Canyon and Fish Creek Canyon.

--It designated BLM lands integral to the scenic vistas of surrounding Canyonlands National Park proposed wilderness as VRM Class II or less.

--It designated BLM lands integral to the scenic vistas of adjacent Glen Canyon National Recreation Area proposed wilderness as VRM Class II (Mancos Mesa) and Class IV (the Nokai Dome area just east of Wilson Mesa).

BLM's inclusion of all P class areas under VRM Class I objeectives (4-71) is a necessary first

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Special Conditions for Visual Resource Management Under Alternative E

VRM classes II through IV are derived in response to on-the-ground inventory using criteria found in BLM manual 8410 (draft appendix G). Class I areas were designated in response to a management decision to protect significant visual resources. At the time the VRM inventory was done, only designated primitive areas were designated as VRM class I; changes in VRM classes (for example, in response to ROS inventory or special management designations) would be made through this RMP. Areas now designated as class I are shown in draft figure 3-18 (as revised). The inventory requirements for determining ROS classes (draft appendix F) are different from those used to determine VRM classes; comparison of the inventory criteria shows that little correlation between existing VRM and ROS classes would be expected.

As noted above, BLM is not obligated to manage public lands adjacent to NPS units so as to protect park values or proposed park management scenarios (such as proposed wilderness). The Secretary has determined that protection of integral vistas should be handled by state governments, not by BLM (see response to comment 6, Sierra Club, Cache Group, comment page 3).

step. But unless the SPNM and other areas mentioned above are addressed through increased VRM class designation, the BLM's assessment of visual resources within the SJRA will continue to be inadequate, as well as inconsistent with surrounding NPS management. Much of the resource area's high quality scenic values fall outside the P ROS class. Examples of this include the U-95 Scenic Corridor, Valley of the Gods, and Lockhart Basin.

In order to insure adequate protection, special conditions for visual resource management need to be applied to all the ROS classes. Our minimum standards for ROS special conditions under Recreation reflect this need and include special conditions for visual resource management for each ROS class. They are in addition to the standard operating procedures provided on page A-6 of the RMP, which alone do not adequately provide for the protection of VRM classes.

Areas in Need of ACEC Designation to Protect Visual Resources

A couple of areas within the SJRA are in need of ACEC designation to protect their high quality visual resource values. The definition of an ACEC under Sec. 103(a) includes scenic resources as one of the values the designation should be used to protect. The areas listed below need ACEC designation to insure their visual resources will be maintainted to meet the projected increased demand from sightseeing use (as discussed on MSA 4333-38.) Without special management designation and focus, the scenic values of these areas will be lost to conflicting land uses, as documented in the MSA.

1.Lockhart Basin-Indian Creek ACEC

The boundary of this ACEC would include all the area discussed in the MSA and Alternatives C and D, as well as additional acreage to the southe (see enclosed map). This acreage increase is necessary to realistically encompass the unique visual resources of this part of the SJRA, and maintain the integrity of Canyonlands National Park and the Canyonlands Basin.

The MSA identifies Lockhart Basin as meeting the criteria for ACEC designation due to its "outstanding scenic qualities", the "scarcity" of these qualities within the Colorado Plateau, and because "special management attention is required to prevent irreparable damage to its' scenic qualities" (MSA pg 4333-66 to 68). The ACEC was carried forward into Alternatives C and D of

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The preferred alternative would manage all P ROS class areas (except those near the Colorado state line) as VRM class I (draft page A-13). In addition, other areas (such as special management designations) would be managed under VRM class I where it is felt that this level of protection of visual resources is necessary.

Areas in Need of ACEC Designation to Protect Visual Resources

The ACECs proposed in the proposed RMP have been extensively revised from those shown in the draft (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). Specifically, the proposed RMP proposes ACEC designation for Indian Creek, the Highway Scenic Corridor, Butler Wash, and the Valley of the Gods area within Cedar Mesa, to recognize and protect scenic resources.

Under guidance in BLM manual 8410, Visual Resource Inventory, an area must be (1) scenic quality A and (2) unique or very rare within its physiographic province in order to be identified as a candidate potential ACEC for scenic values.

The areas suggested in this comment have been handled as follows.

Lockhart Basin - Indian Creek. As the comment notes, in the draft the Lockhart Basin area was the only part of commentor's nomination that was found to meet the criteria for a scenic ACEC, and was considered as a potential ACEC under alternatives C and D (but not E). Appendix H has been revised to clarify the rationale for disposition of each area nominated (see revisions to draft appendix H).

As discussed earlier, the MSA did not propose areas for ACEC designation.

the RMP, but not Alternative E. No special conditions for use of the area were developed under Alternative E per se, nor does it receive much protection based on the SOPs or ROS classes (most of the area is designated SPM and RN). The only allusion to protection of the area is the statement that:

> "Projects would be analyzed individually to provide for mitigation of adverse environmental impacts". (Pg A-87 RMP)

This management is inadequate to protect the unique scenic values of the area and to maintain the intregity of adjacent Canyonlands National Park.

ACEC designation is necessary for Lockhart Basin as the most effective way to protect the high quality visual resources it contains. The ACEC designation should have been carried forward into Alternative E, based on the reasons stated earlier in our introductory discussion of ACEC's. The proposed ACEC is an integral part of the scenic vistas of Canyonlands National Park and the larger Canyonlands Basin; the area must receive special management attention to insure that the integrity of the park and basin is maintained.

Besides visual resources, the proposed ACEC also has a number of other resources present that need protection. For example, cultural resources in this area are both unique and relatively undisturbed compared to the larger resource area. The only trout bearing stream within the resource area is found here and has high potential for fishery development. Current Recreational use of the area is intense. Camping has reached its capacity and ORV use is approaching its capacity. (MSA Pg. 4333-37). Both uses are expected to increase 20-30% by the year 2000, with increased ORV use expected to be heaviest in the Indian Creek area. (MSA Pg 4333-40).

Upon examination of the whole--that is visual, cultural, wildlife, and various recreational resources and their inherent values and conflicts, and the potential conflicts between these resources and other surface disturbing activities, such as oil and gas exploration and potash strip mining--it is clear that ACEC designation is required to adequately protect the significant visual resource. Specific conditions for land use activities must be developed to insure this protection. Otherwise BLM will be ignoring its mandate for visual resource protection in an area of scarce and outstanding scenic quality. Examples of the minimum special conditions necessary include:

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Protecting the integrity of NPS units is not one of the criteria for designation of an ACEC on public lands (BLM manual section 1617.8).

Upon review, BLM re-evaluated the scenic values within the area nominated in this comment. Within the Lockhart Basin potential ACEC, BLM has included the lower Indian Creek Canyon in the proposed RMP as a proposed ACEC for scenic values. The area is adjacent to Canyonlands NP.

Cultural resources present in the Lockhart Basin potential ACEC are not considered significant enough to warrant protection through designation as an ACEC on their own merit, but BLM recognizes that numerous sites exist in the proposed Indian Creek ACEC and has developed special management conditions that would provide a buffer of 100 feet to protect all significant sites from surface disturbance (see revisions to draft appendix A).

This comment mentions a trout-bearing stream in the Lockhart Basin potential ACEC. BLM is aware that the upper end of Indian Creek is a trout fishery (draft page 3-52), and has proposed that this area be designated the Shay Canyon ACEC (draft chapter 2). BLM is not aware of a trout-bearing stream in the Lockhart Basin area.

BLM does not believe that potash strip-mining is likely to occur in the SJRA (draft pages 3-27 and 4-61).

--The ACEC contains a variety of ROS classes. The specific condiitons given below are in addition to those for ROS classes (as outlined in the Recreation section of these comments) and take precedence.

--All activites will be required to meet VRM Class I Objectives.

--The ACEC will be managed according to Oil and Gas leasing Catagory 2.

--ORV use will be limited to existing roads and trails.

--No land treatments will be allowed.

SCENIC ROADED CORRIDOR ACEC

The boundaries of this ACEC would be based primarily on the recommendations presented in the U-95 Scenic Corridor Study. Additionally, the following roads or areas would be included:

--The Manti-La Sal National Forest Kigalia Scenic Corridoor north from U-95 to the BLM/USFS Boundary.

--The entrance road to Natural Bridges National Monument

--The roads within Comb and Butler Washes.

--Comb Ridge: from the western edge of Comb Wash east to the prominent cliffs east of Butler Wash, and from the USFS boundary on the north, continuing south to the San Juan River.

--The Hole in the Rock Trail.

--The Mormon Trail from U-261 east to Comb Wash.

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The Indian Creek proposed ACEC would be managed under VRM class I, would have no-surface-occupancy stipulations applied to mineral activities, and would be segregated from mineral entry. The proposed ACEC would be closed to ORV use. No land treatments would be allowed (see revisions to draft appendix A.)

Scenic Roaded Corridor ACEC

The U-95 corridor as identified in the corridor study (draft page 3-81) has been considered as a potential ACEC under alternative D in the proposed RMP and final EIS. A modified corridor has been proposed as an ACEC in the proposed RMP. The proposed Scenic Highway Corridor ACEC does not include all areas suggested in this comment. It does not include the entrance road to Natural Bridges NM, the unimproved roads in Comb and Butler Washes, Comb Ridge, or the Hole-in-the-Rock (Mormon) Trail, but does include the White Canyon viewshed as seen from highway U-95.

--The boundary should include as much of the "unobstructed view area" as possible on U-263, U-261 and White Canyon, as discussed in the U-95 Study.

The U-95 Scenic Corridor Study presents a strong case for special management of these areas based on their unique visual values and their need for protection.

"U-95 and associated highways [U-261, U-263] present a unique network of scenic roads within a vast recreational and wilderness complex" (pg4).

"The study area is uniquely located among some of the most spectacular scenery in the world. Massive rock formations attest to the tremendous pressures at work on the earth surface...Expansive sandstone formations have been subject to countless centures of water and wind erosion. The result is a myriad of vertical canyon walls cast in various shades of red and white. These canyons with a blue background of sky and Lake Powell provide tremendous aesthetic beauty. Canyons give way to brushy flatlands and cedar mesas and slolitary mountain peaks visible for miles in every direction. The whole area is essentially uncluttered by man's developments. Thus, one of its prime values is the vast open aspect readily felt by all who visit. (Page 3-18 19)

"Preservation of the visual corridor is a vital issue in consideration of any use, management, or development scheme for the area. Picturesque views of a natural canyonlands landscape are coutinous along the highways. Visual elements within the corridor and the vistas beyond are threatened if uncontrolled or ill-planned development enroaches" (Pages 5-6).

Further study discussion elaborates on the need for special management focus and provides implicit support for ACEC designation through its proposed "techniques" and "mechanisms".

"Inherent within this concept is a requirement that all who have a vested interest in or control over the use, management, or development of the land accept the premise that their are natural landscape values worth protection which require a unified commitment to their preservation. This will require some mechanism for review of proposals or standardized criteria for assessment against the visual

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BLM agrees that the U-95 corridor study provides valuable suggestions for management.

resource values." (pg 7)

"...there must be consistent recognition of the visual resources' values among the various state and federal interests and a unified committment to their preservation through various management techniques and mechanisms available to each agency." (pg 9)

The only present acknowledgement by BLM of any of the findings and recommendations of this report is coordination:

"with the State Land Board on chainings and other land treatments to minimize visual impacts as viewed from U-261" (Pg 3-81)

This is a gross understatement of the concerns identified in the report, especially given how previous land treatments have seriously degraded the visual qualities along U-261.

The draft Grand Gulch Plateau Management Plan (GG PMP) also supported the findings and recommendations of the study and adopted all of it's recommendations in its proposed Highway Visual Corridor. The Grand Gulch Plateau Interim Management Plan also included maintenance and enhancement of scenic qualities as part of it's three main objectives; one of its intents is the preservation of visual qualities (MSA Pg 4333-15 and 16).

Support for our inclusion of additional highways can also be shown. The GGPMP also recommended that a visual corridor study of the roads not included in the U-95 Corridor Study should be completed (presumably including the Comb and Butler Wash roads since they are within the unit). SUWA believes that all of the qualities and values described by these plans are also integral to the Natural Bridges National Monument entrance road, the Manti-La Sal Forest Kigalia Scenic Corridor, the Hole-in-the-Rock Trail, the Mormon Trail and the Butler and Comb Wash Roads.

Comb Ridge itself is clearly an integral landscape feature of the area, as stated in the Draft GG PMP.

" The most dominant land form in SE Utah"

"Comb Ridge is an outstanding geologic feature."

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 43]

BLM does not believe that Comb Ridge meets the criteria for designation as an ACEC based on its scenic qualities (see also the response to comment 100 from Owen Severance). Comb Ridge falls within the area analyzed as the potential Cedar Mesa ACEC under alternative D in the final EIS.

The earier description of the "aesthetic" values of the U-95 Scenic Corridor Study area also implicity includes Comb Ridge, and directly refers to it on page 3-1.

All of this, coupled with the projected increases in recreational uses [especially ORV use in the already heavily used Comb and Butler washes, (MSA Pg 4333-40)] supports designation of this area as an ACEC. Unified and coordinated management will be necessary to preserve the unique scenic values of the ACEC. ACEC designation will focus management attention towards achieving this goal, and must require plans of operations to insure management objectives are being met. Along with ACEC designation, necessary special conditions for management will also need to be developed. A number of areas along the Scenic Corridor have been identified as areas with high to moderate potential favorability for development of mineral materials, and with moderate potential for oil and gas and various minerals. These activities would cause serious surface disturbance impacts on the visual resources within the ACEC. Special conditions to protect visual resource damage from such impacts is part of current management as per Alternative A (A-2). Even these special conditions were not carried forward into Alternative E (see Figures 3-2, 3-4,3-5, 3-7).

The special conditions should, at a minimum, include the following:

The ACEC contains a variety of ROS classes. The special conditions given below are in addition to those developed for ROS classes and take precedence.

--All surface disturbing activities will be required to meet VRM Class I objectives.

--The ACEC will allow no surface occupancy for oil and gas leasing, exploration, or development.

--No new land treatments will be allowed.

--ORV use will be limited to designated roads and trails.

Valley of the Gods ACEC

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[Comment page 44]

Under the Scenic Highway Corridor proposed ACEC, uses of public lands would be subject to special conditions. The proposed area would be managed as VRM class I, would have no-surface-occupancy stipulations applied to mineral activities, would be segregated from mineral entry, and would be closed to ORV use; no land treatments would be allowed (see revisions to draft appendix A.)

Valley of the Gods

The draft has been revised to consider the Valley of the Gods as an ACEC under alternative D and as a special emphasis area within the Cedar Mesa ACEC under alternative E (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H, and I).

From the junction of U-163 and U-261, the boundary of this scenic ACEC should follow U-163 east to T.40 S,R.20 E,S.32; continue northwest to the rim of Cedar Mesa, following the rim west and southwest and south to the Glen Canyon National Recreation Area boundary, south along the National Recreation Area boundary; to the San Juan River; east on San Juan River to "The Tabernacle"; and northeast to junction of U-163 and U-261.The boundary would include all lands one-half mile north, northwest and northeast of the Cedar Mesa rim.

The Valley of the Gods area contains a spectacular scenic qualities. The proposed GGPMP described the area as:

> "a spectacular area of scenic buttes and mesas...Valley of the Gods is considered a miniature Monument Valley. There are 20 to 25 buttes, pinnacles and spires that range in height form 100 to 600 feet."

Thousands of tourists each year, in private vehicles or tour buses, drive though this area on U-261 and the all-dirt county road to view its unique scenery, and stop to appreciate the sweeping vistas available form the Cedar Mesa Rim. Clearly, Valley of the Gods is an integral part of the high quality scenery within the SJRA. The proposed GGPMP included the area as part of its Highway Visual Corridor. The U-95 Scenic Corridor Study also included the area.

Despite all this, BLM has failed to recognize any of the scenic values of Valley of the Gods. It was placed in VRM Class III under the visual resources assessment and inventory, and received a C for scenic quality, the lowest rating on the scale.

This assessment is at best a gross error in the inventory or else the evaluative procedures in the VRM process need to be reassessed to take into account the actual existing visitor use that is specifically directed to an areas visual values.

Given:

--the high quality of the visual resources present;

--the current use related to these values, and the projections for increase in this use;

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[Comment page 45]

The scenic quality rating for the Valley of the Gods has been reviewed and amended to class B. This reclassification in turn has caused the VRM class to be upgraded from III to II (see revisions to draft table 3-14, figure 3-18, and pages 4-43, 4-57, and 4-71). See also the response to comment 97 from Owen Severance.

--and, the potential for surface disturbing activities to substantially degrade the visual resources (oil and gas exploration has taken place, "high favorabiility for development" of mineral materials is shown in Fig 3-5, Pg 3-19).

Valley of the Gods clearly qualifies for ACEC designaiton to protect its' visual resources. Along with this designaiton, special conditions for use also need to be developed to insure effective proteciton. These should include, at a minimum, the same special conditions as those SUWA suggests for Lockhart Basin.

CULTURAL RESOURCES

General Comments

The BLM's treatment of cultural resources is inadequate and not in compliance with law. The SJRMP should be re-issued to reflect a more appropriate and "balanced" treatment of this resource.

Cultural Resources are Highly Significant and Threatened With Severe and Widespread Destruction

The MSA (MSA 4331-1) and the RMP (1-6 and 3-60) clearly affirm the national significance of cultural resources in the SJRA. Site densitites of 40 to 50 sites per square mile are not uncommon. Some areas are known to have up to 200 sites per square mile, or virtually continuous evidence of prehistoric use and habitation.

Significant destruction of cultural resources has occurred in the past and is ongoing (MSA 4331-3, 4331-20). The primary source of this destruction has been and will likely continue to be (without changes in management policies) related to primary and secondary impacts of oil and gas leasing, mineral development, energy and non-energy realty actions, and grazing and recreation management practices (MSA 4331-9 and 4331-10). Given current levels of destruction under ongoing management programs, the BLM will be unable to meet the public demand for conservation for future use during the life of the plan (4331-19).

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[Comment page 46]

Cultural Resources: General Comments

BLM is confident that the draft adequately addresses the agency's legal obligations, and does not agree that the treatment of cultural resources in the draft fails to comply with law. (See also draft page 1-6, as revised.)

Cultural Resources are Highly Significant and Threatened with Severe and Widespread Destruction

BLM recognizes that vandalism and adverse impacts to cultural resources have occurred in the past and continue to occur despite mitigation efforts (see draft pages 3-60 and 4-16 and MSA page 4331-20.) The preferred alternative is expected to improve BLM's management of cultural resources.

It is clearly stated in the MSA that current management is inadequate to protect cultural resource values (MSA 4331-20). Many opportunities are identified for improving management practices involving not only the cultural resource program (MSA 4331-21), but also the oil and gas, energy and non-energy realty, grazing, recreation, and habitat management programs as well (4331-27). These opportunities, however, are not carried forward in the RMP. Conflicts between the management of cultural resources and other resource programs are not identified and analyzed.

The SJRMP Fails to Satisfy Legal Mandates for Cultural Resource Protection

Provisions of FLPMA section 202(c) have not been satisfied, according to requirements described on page 1-9 of the SJRMP. For example:

-- "Sustained yield" of cultural resources is not being incorporated as a management principal and will not be realized for cultural resources. It is clearly stated in the MSA (4331-19) that future use of the resource will not be provided for within 10 years, if the ongoing rate of destruction is unchecked. Yet massive destruction of this resource base is planned in the preferred Alternative E (4-69).

--Priority has definitely not been given to areas of critical environmental concern. Less than 14% of acreage recommended for cultural resource protection in the MSA (4331-28 to 4331-31) has been proposed for protection in Alternative E (4-69). These areas (North Abajo, Alkali Ridge, Grand Gulch and Hovenweep) all contain highly unique and significant cultural resources.

-- Inadequate inventory (5% of the SJRA) has been performed to provide a basis for the plan. Major areas of probable high significance have received virtually no inventory. Some of these are mentioned in the MSA (4331-27).

-- Future use of cultural resources in the SJRA has been knowingly foregone. The fact that conservation use needs will not be met within the life of the plan clearly indicates that this resource will not be available for the use of future generations.

--The relative scarcity of cultural resource values has not been addressed. Cultural resources

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 47]

Most of the changes recommended in the MSA were carried forward into the draft and were analyzed under either alternative D or alternative E (draft chapters 2 and 4, appendix A). Draft alternative D (page S-13) provided for maximum protection of cultural resources. The resulting impacts on management of other resources were not thought to provide for the highest and best use of the public lands and resources as a whole (see draft table 2-10 and chapter 4.

The SJRMP Fails to Satisfy Legal Mandates for Cultural Resource Protection

"Sustained yield" for cultural resources is undefined. Cultural resources are a finite, nonrenewable resource. The draft states that potentially adverse impacts to cultural resources will be mitigated through inventory, evaluation, avoidance, or site-specific measures (draft page A-27). BLM will hold a formal or informal consultation with the Utah State Historic Preservation Office and the Advisory Council On Historic Preservation under Section 106 of the National Historic Preservation Act before approving or implementing any action that may affect significant cultural resources; the text of the draft has been revised to clarify this (see revisions to draft page 2-6).

The ACECs proposed in the proposed RMP have been extensively revised from those shown in the draft (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). Specifically, the proposed RMP proposes ACEC designation for Cedar Mesa and the area around Hovenweep to recognize and protect cultural resources, in addition to the previous proposals for Alkali Ridge and Shay Canyon (the previous proposal for Grand Gulch falls within the larger Cedar Mesa proposal).

The draft provides for an ongoing inventory of SJRA for cultural resources (draft page 2-6).

As stated above, scarcity of any resource was not addressed in comparison to a national arena. BLM has no way of measuring this type of impact.

such as those in SJRA are extremely scarce relative to other types of resources on a national scale. They are highly unique to the SJRA and limited to directly-adjacent areas. This has been acknowledged in the plan but the resources have not been treated accordingly.

--The long term public benefits of cultural resource protection have clearly not been weighed against short term gains. This is particularly true in the oil and gas, grazing and recreation programs. See additional detail below.

--Little attempt appears to have been made to coordinate BLM land use with the generally protection-oriented policies of Canyonlands National Park, Natural Bridges National Monument, and the Glen Canyon National Recreation Area.

Provisions of FLPMA section 302(b), constraining BLM from "unnecessary and undue degradation" of public lands, have not been met. The destruction of the cultural resource is certainly undue, and, as discussed below, unwarranted by resource conflicts and unsupportable under any "multiple use" mandate.

The requirements of several other legislative mandates requiring protection of cultural resources (e.g., Antiquities Act, National Historic Preservation Act, Archaeological Resources Protection Act) are not satisfied by the proposed level and type of destruction of resources described in the SJRMP for Alternative E.

Cultural Resources Should Have Been a Planning Issue in the SJRMP

The omission of cultural resource management and protection as a planning issue in the SJRMP constitutes a "fatal flaw" which can only be corrected through preparation of a revised draft document. According to BLM's own definition of requirements for issue development, this omission is clearly inappropriate.

On page 1-9, the RMP presents two criteria for identification of planning "problems." Cultural resources qualifies as a problem under each criterion because 1) management practices necessary to protect cultural resources as required by law (see above) would impose constraints on the management of other resources, and 2) documented public controversy regarding the destruction of

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[Comment page 48]

BLM is confident that the draft impact analysis properly estimated both the long- and short-term impacts from the alternatives discussed (draft page 1-11 and chapter 4).

BLM initiated coordination with agencies managing adjacent federal lands (draft chapter 5). See also the response to comment 3 from National Parks and Conservation Association, on this topic.

BLM is required by law to manage public lands to prevent unnecessary and undue degradation (draft page 1-9). An RMP establishes broad allocations of uses on public lands, but does not plan for management of illegal uses (draft page 1-10). The impact analysis did not indicate that any alternative assessed would result in unnecessary, undue, or unwarranted impacts on public lands (draft chapter 4).

Cultural Resources Should Have Been a Planning Issue in the SJRMP

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

archaeological resources and BLM's management practices has occurred repeatedly in recent years (MSA 4331-35). This has been more than sufficient to indicate a serious concern over the management of this resource.

Opportunities to change the current management practices of cultural resources should have been discussed in the RMP according to the criteria on page 1-9 because: 1)cultural resource management problems can be resolved in alternative (non-administrative) ways, and 2) current administrative measures to curb cultural resource destruction (e.g., monitoring, patrol and surveillance, inventories, National Register Nominations, etc.) have been ineffective (MSA 4331-20).

It appears as though the statement in Chapter I that the "use and management of cultural resources is specifically governed by law and regulation" and therefore "beyond the discretion of BLM field office personnel" is intended as a justification for the failure to treat cultural resources as a planning issue. While many aspects of the cultural resrouce management program are, in fact, covered by law, this is irrelevant to the land use planning process. The goal of land use planning is not to provide legal mandates, rather to minimize land use conflicts and identify the "highest and bes" use of public lands. By not including cultural resources as a planning issue, the opportunity to check ongoing destruction of cultural resources by reducing conflicting land use allocations is effectively lost. Many opportunities for reducing cultural resource destruction by reducing land use conflicts are described in the MSA but are not carried forward in the RMP.

Impact Analysis is Inadequate and Incomplete

For a variety of reasons the impact analysis performed in the RMP is inadequate. Major problems include the following:

--While the total number of sites to be affected by each alternative is presented in Chapter 4, the impacts of specific actions contained in the alternatives are never discussed. The reader is never informed, for example, that the proposed chaining of nearly 250,000 acres in Alternative E will likely result in direct or indirect impacts to many thousands of sites. Thus it is impossible to weigh the benefits of this chaining against costs to cultural resources. To say that the aggregate of proposed actions in an alternative will result in a particular level of impacts is an invalid approach to impact analysis, which precludes meaningful evaluation of specific program actions.

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[Comment page 49]

BLM recognizes the need to protect cultural resources, and used the draft to examine options available for improving current management practices. Management of cultural resources under BLM's management program 4331, Natural History/Cultural Resources Management, was discussed in the draft. The policy and procedures for managing cultural resources are discussed in the draft on page 2-6 under Management Guidance Common to All Alternatives. Management options under the different alternatives assessed were discussed on pages 2-19, 2-20 (table 2-2), 2-31 through 2-39 (figures 2-7 through 2-11), 2-56 (table 2-5), 2-60 (table 2-6), and 2-69 (table 2-7). The preferred alternative provides several special designations for cultural resources (see draft table 2-2, page 2-20, and table 2-6, page 2-60, both as revised). Special conditions for use of public lands were developed to protect cultural resources (draft appendix A).

BLM is confident that the preferred alternative provides an adequate framework for management of cultural resources in the SJRA.

Impact Analysis is Inadequate and Incomplete

All impact analyses, inherently, are estimates of projected effects caused by hypothetical actions (draft page 4-2). When dealing with projected impacts upon an unquantified (unknown) resource, such as undiscovered cultural resource sites, an agency must rely on a series of analysis assumptions. The assumptions used for cultural resource impact analysis are given in draft appendix Y. These in turn are based on the assumptions regarding the projected amount of surface disturbance estimated to occur under each alternative (draft chapter 4).

The impact analyses presented in the draft were prepared using worksheets to quantify the estimated impact on every affected resource from each management prescription under each alternative. These worksheets, numbering several hundred, are part of the planning record for this RMP and are kept in the SJRA and MDO. Impacts were aggregated in the draft in the interest of brevity. This is a valid, commonly used approach to impact analysis. See also response to comment 30, State of Utah, Office of the Governor.

--There is no meaningful analysis of cumulative or residual impacts to cultural resources. The long term importance of the loss of 16,000 sites to ongoing and future scientific and public use (Alternative E, 4-69) is never discussed. It is never pointed out that the majority of sites impacted by vandalism are those most valuable properties containing stratified and well preserved deposits.

--Procedures for estimating impacts (direct and indirect) as described in Appendix Y are arbitratry and have little basis in fact. While obviously used to avoid inconsistency in assessing alternatives, they should not be considered a substitute for inventory data. BLM is negligent in not administering an appropriate monitoring program to provide this type of information, given the extensive conflicts between cultural and other resources in the SJRA.

--The concept of "critical threshold" appears to be misapplied for cultural resources in the RMP, Chapter 4. On page 4-5 the critical threshold of impacts to cultural resources is defined as the "untreated disturbance to, or loss of, a cultural property." Using this definition, the critical threshold appears to have been surpassed long ago based on information presented in the MSA. The projected number of sites lost in Alternative E "despite mitigation measures" (A-195) is 15,678 (4-69), exceeds the critical threshold by a factor of 15,678. The cultural resource "critical threshold" as it now stands is probably not useful as a way of reflecting impacts to the resource base. The site specific format masks the real nature and extent of cumulative impacts anticipated.

The Preferred Alternative Does Not Provide Adequate Protection for Special Designation Areas

Another management problem for cultural resources appears to be unauthorized use, or vandalism, resulting in destruction of cultural properties. This vandalism increases substantially in areas where access and use are increased as a result of other program activities. Two primary planning strategies commonly used to address this type of conflict are 1) designation of special management areas, and 2) special stipulations and conditions for other programs. Ideally a combination of the two approaches could be used.

While special designations focus management attention on specific areas, they result in greater protection from other incompatible uses only if accompanied by special stipulations. For cultural resources in the SJRA two types of special designations are proposed in Alternative E: National

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[Comment page 50]

BLM has revised the text of the draft to clarify the meaning of cumulative impacts as applied to cultural resources (see revisions to draft page 4-69). BLM would be glad to review any data commentor can provide regarding the characteristics of the majority of sites vandalized.

This comment disagrees with the procedures described in appendix Y. BLM would be glad to review any methodology commentor can suggest. The draft provides for continued monitoring of cultural resources (draft appendix B).

BLM has revised the text of the draft to clarify the critical thresholds applied to cultural resources (see revisions to draft table 4-1).

The Preferred Alternative Does Not Provide Adequate Protection for Special Designation Areas

BLM is aware of the destruction of cultural properties through vandalism in SJRA. The RMP did not address management of vandalism because BLM does not plan for illegal use through land-use plans (draft page 1-10). Impacts of vandalism were discussed in the draft (chapter 4).

Register Nominations and ACEC designations. Unfortunately however, these designations are often, in the SJRMP, not accompanied by protective stipulations . Their value as protective management tools is therefore substantially reduced.

The fact that a site or district is described as National Register eligible, or is proposed for nomination in the RMP does not per se mean that it will be protected from destruction. Management practices described on A-27 call only for 1) avoidance of impacts "to the extent possible without curtailing valid rights," 2) mitigation of unavoidable impacts, and 3) reclamation of disturbance within 250' of National Register or eligible properties. The first two of these stipulations are standard procedure and required by law, the last will do nothing to protect the scientific values of a site or district. All three relate to planned disturbances only. None address the increased potential for destruction through vandalism caused by such actions as geophysical activites, chaining, ORV use, etc., nor the cumulative destruction of sites through permitted actions.

Protective measures for ACEC's identified in Alternative E are inadequate to prevent many sources of direct and indirect impacts on cultural properties. For example:

1. Grand Gulch ACEC would be open to geophysical exploration; special conditions would not reduce the probability for substantial indirect, cumulative and residual impacts (A-82).

2. Alkali Ridge ACEC is open to mineral leasing, geophysical exploration (with similar inadequate special conditions), mineral materials extraction, mineral entry with special conditions (again inadequate), use of woodland products, livestock use, habitat improvements, and ORV use (A-79).

3. North Abajo ACEC would be open for mineral leasing and geophysical work, available for mineral materials extraction, open to mineral entry, available for use of woodland products, available for livestock use and land treatments (excluding chaining), and available for habitat improvement projects.

Several areas of significant cultural resource values have not been identified as either cultural resource ACEC's or potential National Register Districts. Because so few stipulations on other land uses are imposed for either protective designation, they will probably not substantially increase protection of these resources.

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[Comment page 51]

BLM provided special conditions for management of National Register sites, or sites eligible for listing (draft page A-27). In preparing the proposed RMP and final EIS, BLM has revised these special conditions (see revisions to draft appendix A).

Special conditions on management of surface use were developed for the proposed ACECs to the extent believed necessary to protect values at risk and to resolve identified conflicts. Special conditions must also take into account legal requirements.

BLM has no means of closing an area to geophysical exploration under current laws and regulations.

Public lands in Alkali Ridge proposed ACEC are currently leased for oil and gas production, and most leases are held by production. The new RMP would not serve to change the terms and conditions of existing oil and gas leases (draft page 2-1). A KGS falls within the area (draft figure 3-2). The Shay Canyon proposed ACEC falls within an area thought to be favorable for oil and gas (draft figure 3-11). BLM managers have decided that to close these areas to leasing, or to impose no-surface-occupancy stipulations (see draft alternative D), would result in an unacceptable level of adverse impact to oil and gas production (draft page 4-49). BLM believes that application of the special conditions presented under alternative E would be sufficient to protect cultural resources in the areas. The special conditions for the proposed ACECs have been revised in the proposed RMP and final EIS (see the revisions to draft appendix A).

No existing or potential conflicts were identified in the proposed ACECs due to mineral materials, mining claims, or use of woodland products (draft page A-64); therefore, no specific management prescriptions on these uses were thought to be required. Adverse impacts to cultural resources from proposed land treatments would be determined through site-specific NEPA documents prepared at the time a specific project was proposed (draft pages 2-1, A-1, and A-29); land treatments would have to be performed in a manner that would meet management objectives for the ACEC.

Additional areas have been proposed in the proposed RMP for ACEC designation to protect cultural resource values (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). Specifically, the proposed RMP proposes ACEC designation for Cedar Mesa and the area around Hovenweep to recognize and protect cultural resources, in addition to the previous proposals for Alkali Ridge and Shay Canyon (the previous proposal for Grand Gulch falls within the larger Cedar Mesa proposal).

The Preferred Alternative Does Not Represent Balanced Use Due to a Lack of Protective Stipulations

In a region such as the SJRA where nationally important resources occur in large areas, land use conflicts may be most effectively controlled through limitations on other resource programs through management categories, special conditions, etc. In the SJRMP, opportunities for this type of protection are repeatedly foregone. The preferred alternative is not "balanced," in that while impacts or constraints on other resources are few, the negative impacts on cultural resources are projected to be quite significant. Often, other resource values are not high, or important on a national level as are cultural resource values. The projected benefit of a particular action is low, although the cost to the cultural resource base is high.

Oil and gas resource potential is described as "unknown to low" and "low to moderate" for over 55% of the SJRA (areas C and D, Figure 3-2). Resource information indicates that any pockets of oil and gas which might be located in these areas would be limited in extent. Yet no areas received the "no lease" classification and only 14% of the acreage was placed under the no surface occupancy (NSO) stipulations.

IM 84-254 Change 2 (MSA 4111-23) requires that before areas are closed to leasing, consideration be given to other less restrictive classifications, including NSO. However, IM 84-415 (MSA 4111-23) also states that stipulations (including NSO) are appropriate "...if there are resources...present that cannot coexist with oil and gas operations, cannot be managed...on other lands..., and would provide a greater benefit to the public than would oil and gas operations." The MSA has provided ample information to the effect that i) outstanding cultural resource values exist in the area, ii) oil and gas (including geophysical exploration) activities have resulted in substantial impacts to these resources in the past (MSA 4331-1 to 4331-20). Therefore these resources cannot be said to coexist, nor can the BLM be described as "adequately managing" its cultural resource values.

Clearly the proposal in Alternative E to retain 86% of the surface acreage open to leasing with surface occupancy (4-62) is not "balanced," in that it will inevitably result in significant cumulative and residual adverse impacts to cultural resources, while at the same time resulting in a "relatively insignificant increase" (4-62) of exploration and development of oil and gas resources.

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[Comment page 52]

The Preferred Alternative Does Not Represent Balanced Use Due to a Lack of Protective Stipulations

BLM is confident that the proposed RMP provides for balanced use of public lands and resources in SJRA; that an adequate framework is provided for the management of cultural resources; and that the highest and best use of public lands and resources is provided for.

The text of the draft has been revised to reflect probable potential for oil and gas (see revisions to draft page 3-7).

The commentor correctly notes that, under the preferred alternative, no areas in SJRA would be closed to oil and gas leasing. The reasons for this are addressed in the instruction memorandums cited in this comment. Alternative D of the draft assessed the impacts to oil and gas production, and to protection of surface resources (including cultural) which would be expected to result if sensitive areas of SJRA were closed to leasing (draft chapter 4). After reviewing the impact analysis, BLM believes the surface resources present can be adequately protected with less stringent management conditions, or, in extremely sensitive areas, with a no-surface-occupancy stipulation.

Under the terms of a no-surface-occupancy lease, a lessee is not allowed to use the surface of the lease for any type of exploration or development. Therefore, no surface impacts would be associated with the issuance of the lease. The minerals are still leased, however, and could be developed from adjacent lands.

The preferred alternative, in accordance with instruction memorandum 84-254, change 2, protects the surface resources present with a less restrictive classification than the no-lease category. Use of the no-surface-occupancy stipulations is also in accordance with instruction memorandum 84-415, quoted in this comment.

Under the preferred alternative as presented in the draft, about one-third of the surface of SJRA would be open to oil and gas leasing without application of protective special conditions (draft table S-1). The special conditions range from slight to extensive restriction of the lessee (draft appendix A).

Geophysical operations, which have also been documented in the MSA (4331-9) as leading to extensive damage to cultural reosurces, similarly have not been excluded in any area of the SJRA (2-62). Although under Alternative E special stipulations have been proposed for slightly over two-thirds of the acreage involved, these are generally not effective in preventing secondary impacts to cultural sites caused by increased access to the area and resulting vandalism. Extensive geophysical activity (11,250 miles) is anticipated during the life of the plan under Alternative E (4-62). Again, the high potential impacts on nationally significant cultural values are not warranted by the low anticipated benefits for exploration of low-quality oil and gas reserves over much of the SJRA.

Conflicts between motorized recreation activities and cultural resource values are virtually not discussed during the presentation of Recreation, Affected Environment in Chapter 3 (3-66), nor in subsequent chapters. Opportunities to protect cultural resources and at the same time meet the acknowledged high demand for primitive recreation (3-66) are continually foregone in favor of motorized recreation even though the MSA documents a high level of conflict between cultural resource protection and recreation uses (4331-10) (4333-45).

Clearly this conflict is lower in areas of non-motorized use due to the reduction in the number of individuals using an area and the absence of impacts of motor vehicles. In the MSA, recommended Recreation guidelines for both primitive (P) and semi-primitive non-motorized (SPNM) recreation areas call for these areas to be closed to ORV use (4333-46). Totals of 710,980 acres in existing P and SPNM classes and 70,180 acres of potential P and SPNM classes are identified in the RMP (3-70), for a combined total of 781,160 acres in need or ORV closure to protect primitive values (and co-occurring highly significant cultural resorces). In Alternative E, less than one-third of this potential acreage (273,840 acres) (4-70) is so protected.

The only new Special Recreation Management Areas (SRMA's) proposed in Alternative E will provide "motorized recreation opportunities" (4-70). All three of these areas coincide with districts proposed for National Register nomination and increased protection (Indian Creek, Beef Basin and Pearson Canyon) in alternative D (2-37) and described as having superlative values in the MSA. Clearly, encouragement of motorized recreation in these areas will result in substantial increases in site destruction, an impact which is never discussed.

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[Comment page 53]

Under existing laws and regulations, BLM has no means to exclude geophysical operations from public lands.

Areas where ORV use was believed to provide conflicts with cultural resource management would have vehicle-use limitations imposed under the proposed RMP. The proposed RMP calls for about 20 percent of the SJRA to be closed to ORV use and an additional 30 percent to have ORV use limited to existing roads and trails. BLM believes this would be sufficient to allow both motorized and nonmotorized recreational uses to occur without substantial conflicts.

Surface disturbance caused by ORVs (including damage to cultural sites) was assumed to be included in or overlapped by disturbance from other activities (draft pages A-185 and A-195).

No maps are provided showing the location of acreages proposed for ORV designations. One can only conclude, based on limited evidence, that cultural resource values were not taken into account in the distribution of open and limited acreages. For example, Arch Canyon and Comb Wash, both noted for their outstanding cultural values, will be designated open. "...Damage to cultural sites," the RMP notes, "would continue" (4-71).

The impacts of destructive land treatments such as chaining, on cultural resource values have literally not been addressed in the document. (The discussions on impacts to cultural resource contained in Chapter 4 are not specific as to types of actions causing anticipated impacts.) A total of 241,960 acres is proposed for "new land treatments" in Alternative E and 57,000 acres are proposed for maintenance of existing treatments (2-68). Neither a feasibility or cost-benefit analysis of these actions is presented which takes into account i) the logistical difficulties of avoiding impacts to cultural properties in areas which routinely have densities of upwards of 40 sites per square mile; and ii) failing avoidance, the extreme costs of mitigating impacts to these properties.

In conclusion, the treatment of cultural resource values and management practices in the SJRMP reflects a shocking disregard for the national significance of these resources, and a negligent and careless approach to their protection for future generations. The deliberate omission of cultural resource management as a planning issue has resulted in a document which addresses few if any of the issues and concerns identified in the MSA. The document is therefore seriously flawed and in need of extensive revision.

LOCATABLE MINERALS

The RMP places an inappropriate and unnecessary emphasis on leaving areas open to mineral entry, to the detriment of management of other critical resource values.

In Alternative E only 116,940 acres, or less than 7% of the SJRA, is proposed to be segregated from locatable minerals. This is only 13,590 acres more than are currently segregated under an outdated 15 year old pre-FLPMA planning document.

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Alternative ORV use designations are listed in table 2-8 and can be derived from table S-1 and figures S-1 through S-4 in the draft. Arch Canyon and Comb Wash both contain county roads, which prevent ORV closures (BLM cannot close state or county roads).

Under alternative E, the 241,960 acres represents the gross acreage with potential for land treatment. Of this total it is estimated that 126,800 acres could actually be treated when cultural sites and shallow soils are avoided, and visual resources are considered in project layout. The draft has been revised to clarify this (see revisions to draft pages 2-6 and 2-68). NEPA documentation done at the time a project was proposed would indicate impacts to other resources, including cultural resources (draft pages 2-1, A-1, and A-29). Treatment methods could include prescribed fire, herbicides, or mechanical means.

Physical feasibility has to be considered in identifying these potential sites. BLM would complete a cost/benefit analysis on each site-specific project before deciding whether to proceed.

Site-specific costs and benefits of proposed land treatments would be evaluated after the RMP is completed and at least 1 year prior to development of the applicable annual work plan (instruction memorandum 83-27); the proposal would be coordinated through the annual work plan for the relevant fiscal year. The potential for added cost due to the high density of cultural sites in areas of SJRA would be accounted for during the site-specific cost/benefit analysis.

Locatable Minerals

BLM policy is to keep public lands open for minerals exploration and development unless withdrawal is clearly justified to protect the national interest (MSA page 4111-48). Segregations or withdrawals from mineral entry could be made to resolve identified conflicts between development of locatable minerals and protection of surface resources, if in the national interest. The draft identified areas where mineral segregations were believed to be the minimum level of management required to protect surface resources. In the remainder of SJRA, BLM is confident that other resource values can be protected without resorting to mineral withdrawal.

A soaring rise of public interest in other important resource area values (wildlife, scenic, wilderness, recreation, cultural,etc...) coupled with a substantial decrease in the economic viability of the locatable mineral resource in the SJRA dictates that the SJRMP give more serious consideration to a larger proportion of area segregated from mineral entry in order to protect those other diminishing resources.

Therefore, where significant recreational, cultural, riparian, wildlife, scenic, or other values are identified in the MSA and RMP, and are known to be sensitive to surface-disturbing activities, and especially where these are overlain by areas that are known to be of low or unknown mineral favorability, the RMP should recommend withdrawals to the Secretary of Interior.

For example, only the P and SPNM ROS classes throughout the RA are in high demand and diminihing supply. Substantial acreages in areas (such as Indian Creek, Long Canyon, Gravel Canyon, Deer Canyon, Burch Canyon, Cheesebox Canyon, areas throughout Cedar Mesa, Dark Canyon Plateau, and Beef Basin and Butler Wash) have low or no production potential for locatable minerals, such as copper, gold, vanadium, silver, or uranium, but very high recreational and other values.

(The principal exception is low to moderate uranium potential in the chinle formation in the White Canyon regions. However, even the RMP recognizes that the depressed economic market in uranium took two-thirds of the mining industry jobs out of the SJRA between 1981 and 1983. Since 1983 those figures have contined to plummet. The only real uranium mining- related employment in the SJRA is at a mill site that processes ore from outside the SJRA. The RMP acknowledges that there is no anticipated upturn in the uranium market before the year 2000, or the life of the RMP. The RMP goes so far as to predict that "no production is projected by 2000" (4-9).

The RMP also recognizes that the 103,000 acres currently segregated from locations "has apparently not affected mineral production since mineral potential in the segregated areas is low in all but about 2,300 acres" (4-9). There is no identified rationale as to why similar segregation in low mineral potential areas, in order to preserve and manage significant and sensitive other values, would have any negative effect on potential mineral production.

Alternatives C and D which maximize these other resource values such as recreation, cultural resources, wildlife, and other non-consumptive uses, identifies 239,400 acres and 1,047,550

acres of potentially segregable land respectively, to enhance the protection and management of other critical resource values (Appendix S). (Also, see acreage error at 4-35: "In Alternative C, 1,538,430 acres...would be segregated from mineral location.")

The RMP claims that a "...high percentage of the areas that would be segregated have mineral potential. Nearly 500,000 acres would be in moderate or high mineral potential areas"(4-51). Yet the RMP neglects to fairly contend with the over 444,000 acres of low mineral potential area with other high resource values. This is a grievous error that abandons substantial high-risk resource values to an egregious lack of planning for the sake of an artificial alternative. By only identifying another 13,000 plus acres for segretation, or less than 3% of the available low mineral potential vs. high other resource value areas identified in Alternative C and D, Alternative E neglects to fairly find a balance or adequately identify a reasonable resource mix in the SJRMP.

(Statements such as the following conclusion in Environmental Consequences, Alternative E, Locatable Minerals (4-64), "There would be an unquantified decrease in production that could be significant to individual operators." are meaningless to the general discussion of the reasonable effect or consequences of an alternative or the significance to a resource as a whole over the breadth of the SJRA.)

OTHER NONENERGY LEASABLE MATERIALS

Potash is the "only nonenergy mineral present in significant quantities in the SJRA" and the RMP identifies that there has never been an expression of interest to explore or lease, nor is any anticipated during the life of the plan (4-10).

The moderate to high favorability areas for potash potential are identified over a 304,000 acre area. In Alternatives C and D the RMP identifies between 262,000 acres and 304,000 acres which could require more than standard stipulations to surface strip-mining in order to properly protect and manage other identified significant resource values, including from 21,380 acres to 202,300 acres in the most stringent No Surface Occupancy or No Leasing categories.

Yet Alternative E, in spite of the clear need to provide a management umbrella for identified high value other resources and an admission of low probability of economic resource, and no interest in

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Commentor correctly notes an acreage error in the impact analysis for alternative C (see revisions to draft page 4-35). The text has also been revised to delete the reference to production.

Other Leasable Materials

BLM does not believe that potash strip-mining is likely to occur in the SJRA (draft pages 3-27 and 4-61). The potasn deposits in SJRA lie too far below the surface to be strip-mined; solution mining would probably be used.

mineral leasing, the RMP choses to only place 1,920 acres (or less than 1% of the critical acres identified in Alternatives C and D.) in the No Surface Occupancy category.

This appears to be a gross neglect of the need to provide a balanced and well-reasoned approach to the management of critically identified resources that are, under Alternative E, unnecessarily left subject to disturbance.

AIR QUALITY

We question the conclusion that there would be "no change in air quality under Alternative E." Given the immense acreages under this alternative that are left open to a range of developments, including potash strip mining, tar sands strip mining, oil and gas exploration, uranium mining, etc., it would appear that a worst-case scenario would have to conclude that some air quality degradation is possible under this Alternative. The RMP fails to address this likelihood or possibility.

REALTY

Corridors

Since it is never specifically stated we assume that the 85,760 acres identified for transportation and utility corridors (common to Alternatives B, C, D and E) are referent to the Major Transportation and Utility Rights-of-Way, Figure 3-19, and do not incorporate any other unidentified corridors.

We concur with the statements "The resource has met the demand...existing rights-of-way have found a de facto utility corridor through the resource area..." (MSA 4211-21); and, "There is minimal demand for communication sites, major changes to the transportation plan, or major utility systems" (MSA 4211-21).

We do not believe the plan has identified any need for utility corridors along other major transportation routes in the SJRA. One source of confusion is that there is no identification of the

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Under the draft preferred alternative (page 2-64), 251,980 acres would have a no-surface-occupancy stipulation placed on mineral leases. This acreage has changed in the proposed plan (see revisions to draft table 2-7).

Air Quality

Air quality impacts were based on the analysis assumptions given for each alternative in chapter 4. The impacts to air quality under alternative E would be the same as under alternative A. No development of sufficient magnitude to change air quality is expected on public lands between 1985 and 2000 (the analysis time frame). The analysis assumptions state that no surface disturbance is anticipated from the exploration or production of tar sand or potash.

BLM recognizes that temporary degradation of air quality could occur as a result of individual projects. The significance of such impacts, particularly on adjacent class I air quality areas, and mitigation measures needed, would have to be determined on a case-by-case basis at the time a project is proposed (draft pages 2-1, A-1, and A-29).

CEQ guidelines no longer require the preparation of worst-case analysis (40 CFR 1502.22, May 27, 1986).

Realty: Corridors

Commentor correctly notes that the 85,760 acres shown as designated corridors in table 2-7 are the 85,760 acres of existing groupings of major transportation and utility rights-of-way shown in figure 3-19. This is stated in the draft in table 2-5 (page 2-54).

location of "11,540 additional acres" cited as available for corridors in Alternative B (4-29). Equally important, there is no locational identification of the"avoidance" and "exclusion" areas identified in all alternatives. This makes it impossible to understand the full intent of those classifications, even though they are generally described in Table 2-5.

But Table 2-10 identifies ranges in avoidance areas from 2,550 acres to 512,460 acres (a factor of 200) and a range of 0 to 1,055,020 acres in exclusion areas. In order for this to have any meaning those areas must be locationally identified and described.

We therefore must assume that the majority of avoidance and exclusion areas in the 251,980 acres so identified in Alternative E are either in the existing primitive areas, or adjacent to, or near, the existing de facto corridors.

It would seem incumbent on the RMP to go further and address many of the primitive recreation, scenic, wildlife and other values identified in Alternatives C and D and provide a reason or rationale for not identifying further avoidance and exclusion areas to protect these critical resources in the future, especially in light of the RMP's conclusion that "demand has been met". The RMP fails to then move on to provide additional protection of identified critical resource values with low conflict on up to 1,016,660 acres (see Table 2-10, 2-98; 213,620 acres plus 1,055,020 acres minus 128,810 acres minus 123,170 acres).

Withdrawals

The Federal Energy Regulatory Commission (FERC) powersite withdrawal of 23,763 acres along teh San Juan River and overlapping the San Juan SRMA should be revoked. The two classifications are inconsistent. There is no further likelihood of powersite construction directly upstream from Lake Powell and the withdrawal is unnecessary for powsersite purposes.

Furthermore this withdrawal conflicts with the identification and potential designation of the San Juan as a Wild and Scenic River. Additional withdrawals should be recommended to the Secretary for a variety of resource needs as we have identified throught the above comments.

Disposals

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[Comment page 58]

The avoidance and exclusion areas can be derived directly from the summary (draft table S-1, and figures S-1 to S-4). These have been revised in the proposed RMP.

Withdrawals

Review of the FERC withdrawals will be completed according to a schedule to be developed jointly by BLM's USO and the FERC. Whether revocation will occur will be decided through the ensuing review. This type of decision is outside of BLM's discretion and cannot be made through the RMP.

The absence of any location maps of proposed land disposals by alternative makes the review of this aspect of the RMP extremely time consuming. A simple location map with numbered spot indicators for general location, as used throughout the RMP for other resource programs, would have served this purpose adequately.

Therefore we must object that the RMP is difficult to track and incomplete absent such maps, given that a hundred or more separate properties are identified by township, range, section and aliquot part and are virtually impossible to compare in the various alternative withyout maps.

We have only been able to identify several land disposal proposals in Alternative E (because of time constraints), that we believe are inappropriate in this plan. Other disposals have in all likelihood escaped our attention, and we request that BLM provide the public with an appropriate set of alternative maps.

Specific disposals that are inapproprite include the Fry Canyon Store, Recapture Lake, Devil's Canyon, and a country landfill along U-263.

1. The Fry Canyon Store is within a region of extraordinary scenic and cultural resource significance. There is no planning justification for expanding an existing 5-acre lease in an area entirely surrounded by public lands of high value, to a 25-acre land disposal. The RMP states that the purpose is for "community expansion" (A-125), though there is no community present except a single business. Such a disposal does not meet section 203 criteria, "outweighing other public objectives and values."

2. Devil's Canyon acreage is continuous with other public lands, is not isolated, and is adjacent to an extensive and popular USFS public campground. It is entirely erroneous to suggest that this is an uneconomic and isolated tract that is difficult to manage and therefore suitable for sale or exchange. This is particularly so in light of the fact that the area has notable scenic and recreational values and could be readily managed in conjunction with the USFS for those values.

3. The Recapture Lake tract is not only not isolated, but its disposal would subject other public lands to non-contiguous separation and actual isolation. There is no known or definitely proposed project for the land proposed, and it would not appear that any proposal would meet the criterion of "not more than is reasonably necessary for the proposed use." Because of the nature of Recapture

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Disposals

The lands proposed for disposal under the different alternatives were not mapped because the parcels are too small to be shown accurately on maps of the scale used in the draft. A complete legal description was given in draft appendix Q, and the tracts can be picked out in figure I-5 (draft page I-15).

Specific tracts mentioned in this comment are discussed as follows.

Fry Canyon. The area of development at the Fry Canyon store currently encumbers approximately 17.5 acres, even though the existing lease is for 2 acres. The 25 acres identified in the draft is the smallest parcel possible to cover the current facilities, using aliquot parts. The proposed 25-acre disposal would cause no greater impact to scenic resources than the existing facilities now in place.

Devil's Canyon. The RMP identifies land available for disposal under certain legal criteria. Suitability of a specific tract for disposal would be determined through a site-specific EA and land report prepared at the time the parcel was specifically proposed for disposal (draft page A-125). If at that time the specific parcel was found to be more suitable for retention, because of legal encumberances or other resource values, disposal would not occur. The types of values mentioned in this comment would be considered at that time.

Recapture Lake. The area at Recapture Lake is identified as available for disposal under the Recreation and Public Purposes Act, not under authority of Section 203 of FLPMA, as stated in this comment, because the area carries an exisitng classification for this type of use. The classification was based on a definite, proposed project that subsequently could not be adequately funded. Disposal of this tract would be considered only for public recreation purposes (draft appendix Q).

Lake, the existing uses, the potential for commercial developement along the road, and the high potential for speculation and commercial development resulting in land uses incompatible with current public land management in the immediate area.

4. A privately owned 20-acre landfill along U-263, a proposed scenic corridor, has absolutely no place in this plan. There is no identified public objective. The proposed site is over 70 miles from the nearest community. The National Park Service at Glen Canyon has not identified any need that the Recreation area is incapable of providing for. And there are significant other existing resource values. It would be most inappropriate to create an isolated private inholding in such a large tract of uninhabited public land.

In addition several of the other disposal sites have a high probability of the presence of significant cultural resource conflict. This is especially true of the Navajo Indiand Reservation tracts, the Hatch Trading Post tracts, the Cedar Point tract, and all of the four previous tracts discussed above. As you are well aware, BLM is constrained from disposing of lands without proper consideration of potential impacts on National Register or eligible properties. This RMP fails to discuss proper consideration of cultural resource values in the disposed process.

FOREST MANAGEMENT

General Comments

There are numerous problems inherent in the RMP discussion of forest products and forest management. These problems are severe and substantially hinder the public from gaining a clear understanding of proposed management actions, resource conflicts, and the impacts of use allocation decisions contained in the RMP. What does emerge, however, is an approach apparently in conflict with resource condition assessments and sustained yield recommendations contained in the MSA. These problems are especially disturbing in light of the intention to develop activity plans assigning all lands to one of four management categories, *subsequent to completion of the RMP* (2-5).

Inconsistencies in Acreage Figures

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Landfill. Public land has been considered for a county landfill near Glen Canyon NRA. This is needed to accomodate NPS concessionaires with facilities in Glen Canyon NRA, on the San Juan County side of Lake Powell, and has been closely coordinated with NPS. Public lands are being considered because there are no NPS-managed lands available for this use. NPS has been forced to close the sanitary landfill within Glen Canyon NRA, which was previously used, because of lack of suitable soils and proximity to Lake Powell. The location on public lands was chosen because of the favorable soils, accessibility, and because it is outside the U-95 scenic corridor.

The RMP discusses the fact that sale of specific parcels may be precluded because of the presence of cultural sites (draft page A-125). RMP actions implemented will be in accordance with law (draft page 1-10). During site-specific NEPA documentation prepared at the time a specific tract is considered for sale (draft pages 2-1, A-1, A-29 and A-125), public lands found to have National Register eligible properties would be subject to cultural resource protection laws. Either the lands would be retained, or mitigation measures acceptable to the State Historic Preservation Officer and the Advisory Council on Historic Preservation would be performed.

Forest Management: General Comments.

BLM uses a tiered planning process (BLM manual section 1601.12). Activity plans are prepared after the completion of the land-use plan, in this case the RMP (draft page A-29).

There are many inconsistencies and much confusion in the acreage figures presented in different sections of the RMP. The confusion begins with the categories shown for Table 2-7 (2-62). Here it states that approximately 1,777,680 acres are currently available under Alternative A for private dead fuelwood harvest, and 273,130 acres are limited to onsite collection of dead fuelwood for campfires. Presumably these figures represent separate categories, however their total exceeds public land acreage in the SJRA. The meaning of all of the categories in the column is virtually impossible to decipher since acres for dead fuelwood harvest are shown in each of two main sets of categories, and private and commercial use acreage is similarly mixed. The end result is a table which is virtually unintelligible for all of the alternatives.

Some clarification is provided on page 3-38, indicating that 1,504,550 acres are currently open for private harvest of "wood products." (This figure is shown in Table 2-7 as available only for private "dead fuelwood harvest" with standard conditions.) Areas currently restricted include Beef Basin and two primitive areas, totalling 273,130 acres. Commercial operations to date total 11,490 acres (designated chaining areas) but "could be allowed in other areas if designated" (up to 1,506,060 acres total).

It is somewhat surprising, therefore, to note on page 4-66, under the description of the preferred alternative, that "the area available for private and commercial fuelwood harvest and for harvest of other forest products would decrease to 361,110 acres." This is said to represent a drop of 24% (or 173,720 acres) from Alternative A. Simple math tells us we are now addressing a total of 534,830 acres instead of approximately 1.5 million. No mention is made of the 273,130 restricted acres mentioned earlier, however if we add those in the total is 807,960 acres.

This is roughly similar to the 638,700 acre figure for pinyon-juniper woodlands shown on page 3-38, but the relationship is purely hypothetical at this point.

According to mitigating measures listed in Appendix A (A-4) under Alternative A, "woodland products may be harvested only in designated areas" yet there is no mention of where these areas might be. Checking mitigation measures for Alternative E (A-24) we find that for both P and SPNM classes (totalling 701,740 acres): "No private or commercial harvest of woodland products will be allowed, except limited onsite collection of dead fuelwood for campfires." Incredibly, however, Table 2-7 (2-66) shows us that nearly 1,528,000 acres are recommended open for "private dead fuelwood harvest on designated sites." If one adds this figure to the areas supposedly

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Inconsistencies in Acreage Figures

This comment correctly notes an error in acreages in table 2-7 and on page 3-38 of the draft. Under alternative A, 1,505,910 acres are currently available for private harvest of woodland products. The text of the draft has been revised accordingly (see revisions to draft tables 2-7 and 2-10, page 3-38, and chapter 4).

The figures for private fuelwood collection under alternative A have been corrected (see revisions to draft table 2-7). The areas available for private fuelwood harvest and for limited onsite collection for campfires, added to the area excluded, should have totaled 1,779,190 acres, the SJRA total area, as noted in this comment.

The impact analysis is based on the assumption that only about 35 percent of the SJRA acreage is forested (draft pages 3-38 and 4-13). There are about 1,779,190 acres in SJRA (draft table I-3); as noted in this comment, about 638,700 acres (or about 35 percent of the total area) have pinyon-juniper forest cover (draft page 3-38). Under alternative, 1,505,910 acres are available for forest product use; about 35 percent (or about 527,060 acres) of that area would actually be forested. The restricted areas (273,130 acres, as noted in this comment) were subtracted from the SJRA total area before the 35 percent factor was applied.

The impact analysis for all other alternatives is comparative to alternative A. As noted above, errors in arithmetic have been corrected in the proposed RMP and final EIS.

Specific areas to be designated for woodland product use would be identified through activity plans developed after completion of the RMP (draft pages 2-5 and A-29). The RMP is intended to determine which broad areas would or would not be available for further consideration, based on the resolution of conflicts with other resources. Then, as sale areas are needed, they can be selected using a site-specific NEPA process (draft pages 2-1, A-1, and A-29), and designated, within the areas that are available for such use. As stated in the draft (page 3-38), some designations have already been made. The comment correctly notes that the designated acreage open to forest product use should meet the demand.

excluded from harvest as shown in Appendix A, we exceed the total acreage in the SJRA by 450,000 acres.

The impact of this confusion is that the reader is unable to ascertain what types of management actions are proposed for what areas. The implications of this will be discussed further below.

Inadequate and Inappropriate Management Approach

For the sake of argument, we can infer from Table 2-7 that the acreage proposed for private and commercial use of woodland products under Alternative E is 1,527,130 acres. Clearly, this represents virtually no restriction on SJRA acreage other than for specially designated areas (totalling 273,130 acres). Even though under this alternative a total of 173,720 acres would be removed from "forest product harvest" (nearly 30% of the total pinyon-juniper acreage) due to surface disturbance, no shortage of forest products is anticipated: "...supplies of forest products should remain adequate through 2000" (4-66).

This management approach is in stark contradiction to the resource assessment and recommendation contained in the MSA. The critical threshold for sustained yield of forest products is defined here as that point where all dead wood in readily accessable areas is collected (MSA 4310-18). The critical threshold, according to the MSA, will be reached within 10 years under current management. Dead wood is being "irretrievably removed" by public collection faster than it is regenerating. At the point where all the dead wood is gone,

> "...BLM experience in other Utah districts shows that people start to cut green wood without a permit. When this happens, BLM can no longer manage for sustained yield of forest resources" (MSA 4310-18).

In the SJRA,

> "The dead wood being harvested now is clearly a finite resource." "Although these products are expected to be available through the next 10 years, needs past the year 2000 cannot be met without proper management now" (MSA 4310-18).

Proper management is defined to include a system for limiting areas available for use:

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Inadequate and Inappropriate Management Approach

Table 2-7 states that the acreage available for private fuelwood harvest under alternative E is 1,527,170 acres; of this, 930,860 acres (or about 60 percent of the available area) would have special conditions of use applied. These special conditions (draft appendix A) were applied to protect specific resource values in specific areas (the special conditions for the proposed RMP have changed; see revisions to draft appendix A). Accordingly, use of SJRA acreage would not be unrestricted.

As noted in this comment, the MSA described the lack of funding currently available to manage forest products in SJRA. The lack of funding has precluded a complete inventory of forest products present; therefore BLM cannot determine what level of management is needed to provide sustained yield throughout the SJRA. BLM anticipates that, although wood products will remain available through the year 2000, easily accessible dead and down wood will probably be harvested prior to that time (draft chapter 4).

"If fuelwood gathering were limited to specific areas, dead wood could be more fully utilized. Proper management is currently limited by having the whole resource area available for harvesting dead wood. Advantages of confining use would include more direct control of the program and the wood resource" (MSA 4310-18).

That the program is currently out of control is suggested by a 70% drop in permitted use in FY 84, which occurred when a fee system was initiated (MSA 4310-6). (Although manpower limitations prohibit adequate monitoring, it is assumed that the pre-fee use level of 2500 cords per year has been maintained in trespass use.)

It appears as though private and commercial use of woodland products would be permissable in Alternative E even for fragile riparian environments. The 1,527,130 acres proposed for this category exceeds woodland pinyon-juniper acreage extant in the SJRA by nearly 890,000 acres. Presumably this would mean that riparian areas, or isolated cottonwood or hackberry are all subject to harvest as well. Clearly this could not be contained in any forest management program designed to achieve sustained yields. Indeed, the presence of any commercial use of woodland products in the SJRA appears to be inappropriate in View of the fact that all of the woodland acreage is classified as non-productive (3-38).

Overall, it appears as though the approach recommended in Alternative E will quickly result in an irreversible downward trend in the condition of forest resources. This will result not only from a failure to limit or control forest use, but from extensive vegetative treatment projects. The RMP has failed to bring forward critical information concerning forest management and condition trends presented in the MSA, and is seriously flawed in this regard.

RMP Is Inadequate for Activity Plan Preparation

For several reasons, the SJRMP is inadequate and severely flawed as a land use plan for forest resources, and cannot be used as a basis from which to prepare activity plans as suggested on page 2-5. The following are some of the most serious problems and deficiencies:

--lack of clear and factual data concerning proposed acreages for harvesting of forest products;

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Isolated cottonwood or hackberry trees would not be subject to harvest. Fuelwood harvest and Christmas-tree cutting are limited to pinyon and juniper species, and post cutting is limited to juniper (draft page 2-5); virtually no pinyon or juniper grow within the riparian corridors defined in the draft, because these trees do not tolerate riparian conditions. Exclusion of wood cutting in SJRA's riparian areas is a moot point.

Commercial use of woodland products refers to any use that involves resale for profit. Commercial use of woodland resources in SJRA for fuelwood, Christmas trees, or juniper posts are all viable management options (draft page 3-38). Large-scale timber operations are not envisioned for SJRA.

This comment questions analysis methods use to determine impacts under alternative E. Because it is impossible to predict whether the various kinds of disturbance assumed to occur under each alternative (draft chapter 4) would occur on forested or nonforested lands, loss of acreage from surface disturbance was determined first. The acreage that would remain not subject to surface disturbance was then multiplied by 35 percent to determine the forested acreage still available.

BLM is confident that the management scenario presented under alternative E would not endanger the forest resource. Easily accessible, preferable products (such as fuelwood or Christmas trees) will be used first, but products would still be available. Competing resource values would be protected, in areas of conflict, under the special conditions provided.

RMP Is Inadequate for Activity Plan Preparation

BLM is confident that the RMP will provide a sound basis for subsequent preparation of activity plans for forest management.

Specific acreages proposed for harvest of forest products will be developed after completion of the RMP based upon public demand.

--contradictions and inconsistencies in the information presented;

--no statement of management goals and objectives;

--no information on location of proposed management categories;

--lack of inventory and monitoring data;

--lack of information on conflict analysis, competing resources uses, or impacts of utilization of forest products on other resource values;

--obvious and clear inconsistencies with MSA recommendations for sustained yield and long term management approaches to prevent degredation of the forest resources in the SJRA.

Clearly it is premature to assign management categories and proceed with activity plans until these deficiencies are corrected. An entire re-analysis of the approach to forest management must be prepared, addressing, at a minimum, the issues discussed above.

MINERAL MATERIALS

One of the great absurdities of the RMP is examined in its analysis of mineral material leasing; it is an absurdity that stands as virtually symbolic of the unwillingness of BLM in this RMP to properly address signficant resource values and conflicts, and provide a reasoned and balanced solution.

Sand and gravel are perhaps the single most common resource in the region. They are also among the resources least in demand in terms of quantity and signficance. Their primary use is related to large scale construction, principally road construction. A rural county such as San Juan has a well-defined and limited need for mineral materials. These are generally identifiable as point sources in direct relation to known and planned construction projects.

The excavation of sand and gravel is among the most destructive disturbances, a highly visible strip

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Contradictions and inaccuracies have been corrected in response to this comment.

Management goals and objectives are stated in table 2-5.

As stated in the draft, management categories would be applied through activity plans prepared after completion of the RMP (draft page 2-5). These would be established in accordance with plan decisions presented in the final RMP.

The MSA acknowledged missing or incomplete data (MSA page 4310-10). The RMP (draft appendix B) provides for inventory and monitoring to take place. See also the response to comment 27, Fish and Wildlife Service, page 1, on this topic.

The draft discussed competing resource uses, conflict analysis, and impacts of use of forest products at length.

The MSA indicated the need for forest inventories, a compliance program, consideration of use in areas of greatest need, and management to provide for sustained yield of forest resources (MSA page 4310-19). Forest inventories will be completed as time and funding permit. The other items depend on completion of either an inventory or an activity plan (draft page 3-38). The MSA goes on to note that in the absence of an inventory, the RMP could be used to define areas excluded from use and permit areas; the MSA states that permit areas would be established through EAs after completion of the RMP. BLM is confident that these opportunities would be met through the proposed RMP, and that the preferred alternative would provide an adequate framework to manage woodland resources.

Mineral Materials

Mineral materials are not leased, as stated in this comment; rather, they are sold (draft page 3-18).

The availability of, and demand for, quality materials is discussed on draft page 3-18. BLM would be pleased to review any data regarding San Juan County's needs.

mine to depths of 20 or 30 feet, removing all surface characteristics. It therefore should require the closest scrutiny when considered in relation to other sensitive values of the public lands. Yet the RMP's approach to this easily resolvable issue is to leave fully 86%of the entire scenic and sensitive San Juan Resource Area open to mineral leasing.

As the RMP notes, 240,000 cubic yards of material per year was the previous high demand. However known projects demonstrate a 20% decrease in demand over the next 5 years, and a constant demand thereafter until the end of the life of the plan in 2000 (4-9).

In order to meet past high demand there have been a total of 9 pits in the SJRA totalling 2,247 acres of surface use. The RMP predicts a future need of two additional pits (3-18). If the 2 new anticipated pits are no larger than the average existing pits (250 acres each), then approximately 500 acres of new surface disturbance can be reasonably expected over the next 15 years, or a need for 2 thousandths of 1% of public lands in the planning area.

The potential of important sources of new or additional usable material (areas of possible resource conflict) are identified in Figure 3-5. This table shows three important points: 1) all of the existing materials sites are in close proximity to the existing communities; 2) all of the 44,000 acres known to be favorable for development are in reasonable proximity to existing communities; and 3) potential high to moderate favorability sites (97,000 acres) are identified and mapped and all occur along existing road corridors where future demand is likely to be.

This allows us to draw some conclusions: that the 141,000 acres of identified and potentially favorable sites and existing sites, constitute the known resource from which any new sites would be derived; that this is 300 times the identified demand for material source in the life of the plan; that even this acreage of favorable areas is about 9% of that which is improperly left open to leasing in Alternative E (which other 91% could clearly be closed to mineral leasing without impairing resource availability); that even in the most protective scenario, Alternative D, fully 75% of the known high favorability areas (33,000 acres) would largely be open to leasing; that another 10% (9,000 acres) of potential favorability areas would be open, as well as all existing sites.

This would lead us to conclude that over 45,000 acres (or 90 times the anticipated area of demand) would be available for leasing and use under the most restrictive of all identified management

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Under the preferred alternative as presented in the draft, 596,310 acres (about one-third of SJRA) would be available for the use of mineral materials without restrictions applied to surface use. This does not mean that all of this area is physically suitable for extraction of mineral materials. Site-specific impacts from a specific proposal would be assessed at the time the proposal was considered (draft pages 2-1, A-1 and A-29).

Only a small portion of the 2,427 acres of community pits within the SJRA actually have surface disturbance occurring at any one time (about 180 acres at present). Use within the community pits is a continuing process of extraction followed by reclamation of mined out areas. Since mineral materials extraction affects such a small percentage of the total SJRA acreage (less than 1 percent, as noted in this comment), it does not present a major risk to other surface resource values throughout the SJRA.

BLM policy is to keep public lands open for minerals exploration and development unless closures are clearly justified to protect the national interest (MSA page 4111-48). Areas could be excluded from mineral-materials use or the conditions of use could be limited to resolve identified conflicts between development of mineral minerals and protection of surface resources, if in the national interest.

Because the draft applied the least restriction neccessary to resolve conflicts, lands would be designated as available for mineral-materials use unless there was a documented resource conflict. Where a resource conflict was identified, use would be restricted under the special conditions (draft appendix A) unless closing the area to mineral-materials use was the only way to resolve the conflict.

The draft identified areas where exclusion from use of mineral materials was believed necessary to protect surface resources. In the remainder of SJRA, BLM is confident that other resource values can be protected without resorting to exclusions.

scenarios. Alternatives C and D legitimately identified other sensitive and signficant resource values in need of protection from surface disturbing activities. There is essentially no economic effect of closures for materials so widely distributed and which demand is localized and predictable.

A reasonable planning approach must close all areas without identified mineral materials. It must also limit open areas to those that do not have any identified significant resource conflicts in any alternative unless the need for a common resource such as mineral materials clearly overrides the conflicting resource. Failure to do this unjustifiably invites future resource conflicts and damage.

TAR SANDS

This element in the RMP provides another clear example of the inappropriate analysis and absence of conflict resolution in the RMP. Alternative A describes the current situation regarding tar sands in the following manner:

> "No expressions of interest in leasing the area have ever been received, and the Utah Statewide Environmental Impact Statement (EIS) for tar sand leasing (BLM, 1984(c) concluded that there would likely be no production from the White Canyon STSA or anywhere else in the SJRA in the foreseeable future (before 2000)" (4-9).

Additional comments in the MSA corroborate the limited value of tar sands in the SJRA:

> "The Utah Geological and Mineral Survey has designated the area a zone of weak petroleum shows." "Industry has not shown interest in the tar sand within the SJRA" (MSA 4114-2).

After designation as a Special Tar Sands Area (STSA) in 1980, "no applications for conversion were received for the White Canyon STSA" the MSA notes (4114-1 to 3). Further, "The White Canyon depost is thought to be of much poorer quality than other Utah deposits."

In Appendix 1 of the actual Utah Combined Hydrocarbon Regional Draft EIS referenced above

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Tar Sand

BLM agrees that tar sand is expected to be of limited value within SJRA.

(HCL/EIS), it is stated that on March 23-24, 1983, a meeting was held in the Utah State Office for the purpose of setting final estimated production levels for the various STSA's in Utah. This special report determined for White Canyon STSA that "There is no projected tar sand development in this STSA because of lack of interest in the tar sand resource. Also the limited physical data available indicated that the quality of the resource is probably not of commercial grade" (207-208). It seems clear that the tar sands resource in the SJRA could not be concluded as being anything but marginal. Yet in the preferred alternative BLM weakens the lease category of some areas.

As the Hydrocarbon EIS noted, "STSA's must be reanalyzed and revised category designations established..." and according to the EIS notes regarding the White Canyon STSA that "land use plans will be amended to reflect the new leasing categories."

One of the objects of the RMP is to determine the need for recategorization of the STSA. We therefore find it somewhat appalling that while an enormous amount of informaiton regarding the specific nature of other resource values and conflicts as well as tar sand marginality appear throughout the Hydrocarbon EIS, this data and its analysis is literally non-existent in the RMP/EIS.

With one brief exception, (a reference hidden in an appendix) it was impossible to find any reference in the RMP to the Highway U-95 Scenic Corridor and its affect on tar sands leasing. One single sentence in Appendix A alludes to the potential impact on scenic and visual resource.

There is no discussion in the final RMP of that scenic corridor, its orgin, its purpose, or the goals and objectives in its maintenance. In Alternative E of the RMP, the provision for retention of scenic and visual values simply dissappears, or is at least not discussed, even though the Hydrocarbon EIS Preferrred Alternative places restrictions to preserve scenic values on 29% of the STSA.

The Hydrocarbon EIS stresses the visual resource conflict, stating:

> "The U-95 Scenic Corridor category 2 area would place significant restrictions on potential development within the U-95 viewing area. All visual impacts form tar sand development could not be seen from the highway. This restriciton would

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The analysis of the White Canyon STSA through the Combined Hydrocarbon Leasing Regional EIS [BLM, 1984c] was incorporated into the draft. The category determinations resulting from that EIS are the current leasing categories described under alternative A (draft pages 2-63, 3-1 and A-2). The acreage shown in leasing category 1 under alternative A reflects the special conditions developed for the U-95 scenic corridor through the Combined Hydrocarbon Leasing Regional EIS (draft figure 3-1 and table 3-2). (The leasing category system used in the proposed RMP and final EIS shows this acreage as category 2.)

The scenic corridor was discussed in the draft (page 3-81). In the proposed plan, the scenic corridor has been proposed for designation as an ACEC, and management prescriptions altered accordingly; in the proposed RMP and final EIS the scenic corridor is assessed under alternative D as well as under alternative E. Under the proposed plan, the corridor would be closed to leasing for either oil and gas or tar sand (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.)

limit mining activities on approxmately 2, 340 acres."(Vol II-p101-2)

In addition the Hydrocarbon EIS goes on to state the following regarding other resource vlaues and conflicts.

> "Major issues related to tar sand development include visual resource degradation. Highway U-95, Utah's Bicentennial Highway, was constructed in this area because of the high visual resource values. Desert Bighorn sheep habitat destruction also causes concern because development could eliminate the sheep form the area." (V II- p 3) "Visual and cultural resources are outstanding in the area. Sites are of high prehistoric and historic value and probably contain numerous pristine cultural resources. " " Any mining and development could disrupt and eliminate desert bighorn sheep."

> "Visual resources could be modified and destroyed on 38% of the STSA. Archaeological values on 43 percent of the area could be lost." (V II-p.3).

None of the above is reflected in the resource analysis of the RMP/EIS, and in fact Alternative E weakens current management by lowering the leasing categories of some acres.

This total avoidance of resource description and legitimate analysis of competing resource values, conflicts, and conflict resolution underscores the limited utility of the draft RMP as it is presently written in addressing significant resource allocation. The White Canyon STSA, due to its marginal economic viability and well-established conflict with other significant resource values should be reclassified and the designation dropped. Barring reclassification, proper stipulations must be imposed to provide for a clear opportunity to manage successfully for competing resource values. The entire STSA should at a minimum be in Category 2, No Surface Occupancy, and the majority of the STSA managed under appropriate guidelines for the White Canyon Conservation ACEC (discussed below).

OIL AND GAS

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Because the draft identifies a conflict for bighorn sheep only if mineral uses disturbed the animals on crucial habitat areas during critical periods (draft page 3-42), the special conditions (including seasonal restrictions) attached to oil and gas leases would afford ample protection. It is not believed necessary to exclude the areas from leasing or to apply no-surface-occupancy stipulations. As noted in this comment, tar sand development in SJRA is considered unlikely (draft analysis assumptions, page 4-61).

As stated earlier, BLM policy is to keep public lands open for minerals exploration and development unless closures are clearly justified to protect the national interest (MSA page 4111-48). The draft applied the least restriction necessary to resolve resource conflicts.

The purpose of the oil and gas leasing categories is to provide the BLM with a system that allows for "the need to resolve surface resource conflicts" (A-99). Thus there is a continuum of lease categories from least restrictive (standard operating procedures) to most restrictive (no leasing).

> "Stipulations are justifiable if there are resources, values, uses, or users present that cannot *coexist with oil and gas operations, cannot be adequately managed or accommodated on other lands* for the duration of oil and gas operations, *and would provide a greater benefit to the public than would oil and gas operations.*" (4111-24) (emphasis added).

And further, more stringent categories (or stipulated leases) may be used if existing stipulations "were determined to be inadequate to protect the public interest" (4111-23).

The San Juan Resource Area is noted throughout the MSA and RMP for exceptional and varied environmental values, many of which are considered unique and even of national significance. Specific resource programs repeatedly detail surface disturbing activities by oil and gas exploration as potentially among the most destructive of all activities affecting those resources (see MSA cultural resource, recreation, wildlife, riparian, and visual).

Therefore it is surprising to find that under Alternative E in the RMP there are no acres proposed as closed to oil and gas leasing. This is doubly troubling when it becomes apparent that over 155,000 acres are currently closed to leasing, but would be decategorized to a less restrictive "no surface occupancy" category by the RMP.

The actual total acreage in the two most restrictive lease categories is 8% greater under current management (269,340 acres) than under the preferred alternative (251,980 acres)... and this is occurring under an outdated 15-year-old management plan that predates many of the resource concerns and issues that have surfaced in the SJRA in the last decade.

Although there has been a substantial increase in the acreage covered by some form of special stipulation (314,000 acre increase) this appears to be an inadequate response to the management needs of some resources, as repeatedly identified in the MSA. This unwillingness to restrict oil and gas activities where it is in well-defined conflict with other resource values becomes yet more

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Oil and Gas

No areas are closed to oil and gas leasing under the preferred alternative of the draft. BLM believes that the surface resources present can be adequately protected with less stringent management conditions, including the no-surface-occupancy stipulation.

indefensible when the oil and gas potential is compared to the various competing resource values.

The oil and gas potential appears to be markedly overstated in the SJRMP. Table AS-1, Fluid Minerals Classifications (A-147), provides a chart of oil and gas potential. This chart presumably addresses the spectrum of potential for oil and gas much like the matrix methodology for determining the character of mineral values in validity examinations. That matrix covers a four-part range of known, economic, subeconomic, and unknown values. The oil and gas classification covers Known Geologic Structures, Prospectively Valuable, Not Prospectively Valuable, and Unknown categories. The RMP claims that there are no areas in the SJRA in the Not Prospectively Valuable or Unknown categories. To some extent the restrictive categories for leasing must correspond to the basis of the apparent presumption of value of the oil and gas resource.

While the RMP does not provide us with any technical definitions for the categories in the Fluid Mineral Classification (what precisely it is that distinguishes prospective value from no prospective value), it is interesting to note the terminology used in describing oil and gas potential in Chapter 3 of the RMP:

> "The eastern part of the SJRA has proven potential for oil and gas reserves; potential is unknown in the central and western portions" (3-7).

The western portion referred to is portrayed in Figure 3-2 (Oil and Gas Potential) and appears to comprise about 170,000 acres of public lands. The central portion appears to cover about 840,000 acres of public land. That would mean that BLM's actual data on potential may reflect that over 1,000,000 acres, or 55%, of the SJRA might logically be placed in the Unknown category.

While the legend on Figure 3-2 describes the central portion of the SJRA as low to moderate in potential (in contradiction to the text at 3-7), the RMP provieds little data to support this conclusion.

This central area, also known as the Monument Upwarp or Uplift, has been drilled. However "Its only known fields, Mexican Hat and Lime Ridge, are both very small" (3-10). Just how small is probably worth noting. Table 3-3 (3-8) shows that as of 12/83 the cumulative oil production within the entire Monument Uplift to be 56,948 barrels. However this cumulative production is

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Under the USGS classification system, used in draft table AS-1, land is classified as prospectively valuable if it contains at least 1,000 feet of sedimentary cover above basement rocks.

All lands in SJRA meet this criterion; therefore, all are classified as Prospectively Valuable. BLM specialists realize that when used alone, this presents a simplistic look at the geologic situation in SJRA. Accordingly, the SJRA was further refined into areas of greater or lesser potential, based on geologic conditions present and their similarity or dissimilarity to areas of known production within SJRA (draft chapter 3).

The draft provides a technical definition of the fluid mineral classifications used in table AS-1 (draft page A-147).

The text (draft page 3-7) quoted in this comment has been revised to conform to the information presented in figure 3-2 (see revisions to draft page 3-7).

Much information on oil and gas resources in SJRA is on file at MDO and SJRA. The RMP summarizes the longer discussion on resources present which is contained in the MSA (part II, section 4111).

Classifying over 55 percent of the SJRA as "unknown" for oil and gas potential would not reflect the data presented in the draft or the MSA, nor would it reflect the definition of "unknown" on draft page A-147. Data available for the central portion of the SJRA (the Monument Uplift) are sufficient to classify the area as Prospectively Valuable for oil and gas based on the stratigraphic section and sedimentary characteristics present, and the numerous oil and gas shows in plugged and abandoned wells (draft page 3-10). The available data also allow BLM to characterize the area as having a low to moderate potential for the discovery of new fields (draft figure 3-2).

less than 15/1000 of a per cent of the total production in the SJRA. In other words more than 6,000 times as much oil was produced in the Known Geologic Structures in the high potential Blanding Basin than in the entire central and western portions of the SJRA.

All the known oil production spread over one million acres in these western and central portions (which are classified as Potentially Valuable) came out of one small oil field. It would seem hyperbolic to claim that that million acres is in fact Potentially Valuable, when in fact they are more properly classified as Unknown or Not Potentially Valuable. The issue is further confused when descriptions such as "probable potential" (3-7) are invented which compromise the integrity and meaning of the entire system.

The justification provided in the RMP for not imposing stricter leasing categories over more acreage in order to protect other negatively affected resource values was: "Although the majority of these areas (909,010 acres, or 86%) occur in the Monument Upwarp section of the SJRA, there would be a negative trend in long-term production" (4-49). If one believed the areas foregone indeed had potential value, a negative economic effect could in fact occur. But there is absolutely no data anywhere in the RMP to suggest that this is the case, or that more protective lease categories necessarily would lead to a negative-trend in long-term oil and gas production.

It is contentions such as these which allow this RMP to abandon the obvious need to protect significant threatened resources, by glossing over the unaddressed need with the perception of competing resource values that do not exist. The RMP must readdress specific other resource conflicts with oil and gas leasing and exploration. In those instances where the greater public interest resides in the protection of other resources, and where oil and gas potential is highly suspect, oil and gas leasing should be properly restricted.

GRAZING

Livestock management is one of the two key resources the SJRMP/EIS addresses. In 1974, a site-specific grazing EIS was ordered by the US District Court as a result of a lawsuit brought by the Natural Resources Defense Council. The RMP states that:

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The classification used in the draft for the western and central portions of SJRA is not "potentially valuable," but rather "prospectively valuable", which is defined on draft page A-147 in the discussion of the classification system. The presence or absence of oil fields is not a determinant in making this classification. The classification is instead based on the amount of data available, which is used to characterize geologic conditions present in an area.

In the central and western portions of SJRA, data are scattered, but enough information is available to characterize the area and to show that conditions similar to those in the Blanding Basin are present in the the Monument Uplift. This is verified by many noncommercial shows in wells drilled on the Monument Upwarp, indicating the presence of hydrocarbons and verifying geologic characterizations made.

Many wells in the high-potential Blanding Basin were plugged and abandoned with noncommercial shows. In many instances, these wells are within 0.25 mile or less of producing fields. Therefore, data available through drill holes and geologic analyses indicate the low to moderate potential for the central and western portions of the SJRA. See also the MSA discussion on this topic in part II, section 4111.

BLM agrees that the term "probable potential" is misleading. It has been removed from the text (see revisions to draft page 3-7).

Respondent questions the use of the phrase "negative trend" in relation to the Monument Upwarp. As noted above, BLM relied on known data and geologic inference to determine production potential. Oil and gas encountered in a drill hole, which might be presently noncommercial, may later be of commercial interest if oil prices increase. This comment's analysis of oil and gas potential does not appear to be reasonable, based on the data presented in the MSA and draft.

BLM is confident that the preferred alternative would protect the surface resources present with a less restrictive classification than suggested in this comment.

Grazing

Rather than being "one of the two key resources" that the draft addresses, livestock management is one of the two purposes for preparing the EIS (draft page I-1).

"The grazing EIS is needed to determine management of forage and other livestock needs, to provide for wise allocation of public lands and resources for grazing use." (1-1)

"An analysis is needed, on an allotment basis, to determine if changes are needed in stocking trends, in season of use, or in range management practices." (1-2)

In order to fulfill the EIS requirements and stated needs for range analysis, livestock management was chosen as a planning issue and framed in the following manner:

"What stocking levels and periods of use should be acheived on rangelands within the SJRA."(1-2)

The most effective means to answer this question and meet the needs of both the EIS and RMP, is to have quantitive data that provides an objective analysis of present range conditions and trends. BLM fails to provide such quantitative range condition data in the RMP/EIS. In fact, it lists this as one of the "data gaps" in the MSA.

"Ecological site trend in the resource area has not beeen determined. " (MSA 4322-36)

Under "Present Demand and Capability to Meet Demand", the MSA states:

"These estimates of the resource area's capability to meet [present] demand for livestock forage are based solely on professional judgement of the resource area range staff and are not based on monitoring. Monitoring will be used to establish forage production figures based on livestock utilization of forage and range trend." (MSA 4322-28)

and then concludes, under "Adequacy of Current Management" that:

"The condition of the range in the SJRA cannot be determined prior to evaluation of monitoring studies over the next 5 to 10 years (prior to 1990 or 1995). However, in some aspects, current grazing management does not appear to be

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BLM agrees that quantitative data are preferable to projections. That is why certain grazing decisions must be deferred until monitoring studies can yield this type of information (draft pages 2-6, 3-57, A-31, and appendix J).

adequate." (MSA 4322-40)

Thus, the information base upon which the MSA and RMP conclude their analysis of range condition contains no hard data and *the SRJA will not have one for at least five years.* Instead the analysis is based solely on the subjective judgement of BLM staff in conjunction with range permittees (RMP 2-6, MSA 4322-38). Clearly, then, BLM has failed to satisfactorily provide the site-specific EIS required by the 1974 District Court decision, and will not be able to do so until 1990 at the earliest, 2 years after the Court's deadline of 1988...and sixteen years after the original decision.

Additionally, BLM has no data upon which to base any of the livestock management decision presented throughout the RMP, including Alternative E. Even without hard data, and with the cooperation of grazing permittees, BLM currently classifies 95% of the range within the SJRA in the "improve" category (3-54)(2-6), implying poor range condiiton. Some of the criteria that describe this category include:

> "Present range condition is unsatisfactory."
> "Resource production potential is moderate to high and present production is at low to moderate levels.
> "Present management appears unsatisfactory."(A-47)

BLM acknowledges this poor condition of the range in its' decision to resolve the livestock management issue under Alternative E by continuing current management. (2-11) Alternative E does not reflect this. Details of the livestock management actions proposed demonstrate a number of changes from current management do take place. These include:

> --Livestock use will increasse under Alternative E by 2258 AUMS. [The RMP misrepresents the AUM increase figures. The present five year average (1979-1984) licensed use level is 54, 844 AUMs (4-15, 3-54). But the average use level given for Alternative A is 56735, already an increase of 1761 AUMs above present average use. It is based on this inflated figure for Alternative A that BLM states under Alternative E livestock use would increase by only 367 AUMs to 57,102 AUMs (4-68), when in reality the increase is 2258 AUMs.]
>
> --Potential Land Treatments leap from the present 21,000 acres to 241, 900

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Ecological condition is stated and predicted in draft appendix T. Trend is not, because data are not available; however, trend will be analyzed on the basis of monitoring studies now being conducted (draft pages 2-6, 3-57, A-31, and appendix J). Unless based on conflicts with other resources, changes to grazing cannot be made until monitoring data have been collected; this is part of the agreement stemming from the court-ordered grazing studies cited in this comment (draft pages I-1 and A-31) and is also BLM policy (see instruction memorandum 82-650).

Placing a grazing allotment in the I category does not indicate poor range condition, nor do the management prescriptions developed for livestock grazing under alternative E. (See also the response to comment 3, National Wildlife Federation, pages 8 and 9, on this topic.) As stated on draft page 2-5, changes in livestock use may be made either in response to resource conflicts identified through the RMP process, or in response to range monitoring studies.

Grazing management under alternative E would indeed vary from that shown in alternative A. In response to the concerns raised in this comment:

- The impact analysis is structured so that the change caused by different management scenarios under the different alternatives is compared to the change that would occur in the baseline management under alternative A (draft page 4-2). The 367-AUM difference noted in this comment is the difference between alternatives A and E at the end of the analysis period, in the year 2000. Livestock use is not limited to the 5-year licensed average. It could decrease below this average or increase up to total active preference, but this is not likely for all allotments. The increases shown in alternatives A and E are the estimated total AUMs licensed in the year 2000. Assumptions for these estimates are stated in draft appendix X.

- Land treatments improve livestock forage condition by increasing the quantity and quality of livestock forage plants. This is demonstrated most obviously in a treatment that converts pinyon-juniper vegetation type to a grass type. Land treatments generally set back ecological condition by converting vegetation to an earlier seral stage of development (see draft glossary). As noted earlier, land treatments shown in the draft are areas with physical potential for treatment. At the time a project was proposed (draft page 2-1, A-1, A-29), site-specific NEPA documentation would address any impacts to, or mitigation for, other resource values such as cultural resources.

acres or more than a factor of 11-plus under Alternative E. No quantitative proof exists that land treatments improve range condition or forage. Additionally, many of these are within the identified Grand Gulch Plateau SRMA and National Register District, as well as crucial riparian habitats (such as Comb Wash). Land Treatments are incompatible with the goal and objectives of these areas.

More importantly, BLM never clearly acknowledges that it is precisely this "current management" that has produced the "unsatisfactory" condition of the range that exists today. To continue the same managment is indefensible. The Taylor Grazing Act clearly states that a declining range condition is unacceptable. How can BLM demonstrate this is not the case under current management without any quantitative data?

FLPMA clearly calls for sustained yield of all renewable resources "in perpetuity" How can BLM guarantee this for range forage production under current management without any quantitative data? Unless BLM can adequately answer these questions management decisions under Alternative E must demonstrate no further degradation of range condition until monitoring studies are completed. Only then, with an objective data base, can BLM make accurate decisions on livestock management actions.

One of the actions that must be considered under Alternative E is substantial reduction in livestock use of the range (AUMs). Nowhere in the RMP is over grazing seriously addressed as one of the issues contributing to poor range condition. The only livestock restricitons developed under Alternative E are meaningless and will have little impact on improving range condition. They include:

--Grazing exclusions on 138,120 acres, or a mere 7% of the 2 million acre alloted range. Most of these exclusions are in crucial wildlife habitat, ecologically sensitive areas, and approximately one-half are currently not grazed and some are currently grazed very little due to limited access by livestock and a lack of water.

--Only four allotments have had any season of use change made, despite calls for this type of management action in the MSA. BLM appears to ignore, or at least contradict itself in its discussion of the use of seasonal limits to improve forage

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The current management situation is discussed in draft chapter 3 and at length in the MSA (part II, section 4322). Current management and climate have produced the present ecological and livestock forage conditions. Grazing management would not continue under alternative E as at present, but would be intensified with grazing systems, developed under AMPs, to correct current problems (draft appendix U). Where range condition is declining, it can often be corrected with range improvements and grazing systems that allow rest for plants during critical growth periods and provide for more uniform distribution of grazing use (producing a median use level rather than heavy or light use).

Unless made in response to conflcits with other resource values, adjustments to grazing preference, either upward or downward, cannot be made until monitoring data are sufficient to determine a need for adjustment. Until monitoring determines a need for change, grazing levels will be allowed up to total active preference.

BLM believes that the grazing exclusions identified in the proposed RMP would resolve the conflicts noted.

by reducing threats to vegetation during the critical spring growing season. It acknowledges this as an effective means to improve range condition in the MSA (4322-43) and RMP (4-68) but only implements seasonal use limits on four of the twenty-three allotments with spring grazing.

More substantial livestock reductions must be considered in Alternative E if BLM is to prevent further degradation of current poor range condition. The present RMP/EIS is not in conformity with the decision of the court in NRDC vs. Morton.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

General Comments

The identification and designation of Areas of Critical Environmental Concern (ACEC's) assumes priority in BLM's resource planning program according to Section 202(c)(3) of FLPMA; we anticipate that ACEC designation will continue to be addressed in the SJRA planning process.

The Southern Utah Wilderness Alliance (SUWA) endorses all of the Potential ACEC's identified in the RMP that have been determined to meet the requisite identification criteria. We have concluded that, with some alterations in boundaries and in management prescriptions, these potential ACEC's are necessary and cannot be adequately protected through another form of designation alone or under standard procedures, nor are alternative uses appropriate.

Nominated ACEC's

In addition to the above potential ACEC's, SUWA wishes to nominate several additional ACEC's which we have appended to these comments. We anticipate that these nominations will be analyzed, evaluated, and reviewed according to BLM policy and Guidelines, and a determination of their eligibility as a potential ACEC be made within six months, presumably prior to completion of this current planning effort.

White Canyon Conservation ACEC

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 75]

BLM is confident that the draft conforms with the court orders under NRDC vs. Morton.

Areas of Critical Environmental Concern: General Comments

The ACECs proposed under the proposed RMP have been exten- sively revised from those shown in the draft (see revisions to the summary, chapters 2, 3, 4, and appendixes A, H and I).

BLM is aware of the FLPMA requirement to give priority to the designation and protection of ACECs.

Draft appendix H has been clarified to present BLM's rationale for either carrying these areas forward as proposed ACECs or not considering them further.

Nominated ACECs

Each nomination presented in this comment has been considered in the proposed RMP and final EIS and reviewed in accordance with BLM policy and guidelines (manual section 1617.8).

SUWA nominates this area for analysis and evaluation as a potential ACEC, and consideration and designation through this RMP. We consider this ACEC to be of more-than-local significance, because of several individual vulnerable and sensitive resources, and the exceedingly rare combination co-existing within an exemplary and unusual natural system of high integrity. This is an opportunity to conserve an area of national importance.

Relevance:

This "conservation area" can be found to be relevant because it contains not only one, but several of the resources noted in FLPMA's definition of an ACEC, including important cultural, scenic, and wildlife resources, as well as an important example of a threatened natural system or process.

Importance:

Each of these resources is singularly important. As a scenic value, this is an area of noteworthy quality and high visual sensitivity. This sensitivity has been documented most clearly in the U-95 Corridor Study (a joint agency evaluation including state, federal and local government entities), which concluded that the White Canyon area adjacent to the Bicentennial Scenic Highway was of paramount importance to the visual integrity of the scenic highway designation. This visual sensitivity is further underscored by the fact that the ACEC surrounds Natural Bridges National Monument.

In addition, there is concern for significant archaeological values that are vulnerable to loss or damage because of increasing accessability.

Third, there is the irreplaceable crucial habitat of desert bighorn sheep and their lambing and rutting lands which are particularly sensitive to disturbance, as well as critical to maintaining a viable population.

And last, the fact that the National Park Service has identified the entire length of the White Canyon system from Natural Bridges National Monument to Glen Canyon National Recreation Area as a potential qualifying candidate for wild and scenic designation as a rare and unique example of an ephemeral desert stream, signifies this canyon system as an important landform or natural system or process.

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 76]

White Canyon Conservation ACEC. This nomination is based on cultural, scenic, and wildlife resources, and states that the area is an example of a threatened natural system.

BLM accepts commentor's nomination and has considered this area as a potential ACEC in the proposed RMP and final EIS, although the area does not qualify on the basis of cultural values. The White Canyon area assessed under alternative D in the proposed RMP and final EIS is larger than the area nominated in the comment, to accommodate other public comments (see responses to comment 6, Sierra Club, Cache Group). A smaller area is included in the proposed RMP as part of the Scenic Highway Corridor proposed ACEC along U-95. (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.)

The comment nominates the area in part to protect significant archaeological values, but does not identify specific values as important. BLM's review of the area nominated did not identify cultural values present to be in need of special protection beyond that stated in appendix A of the draft; therefore, the area nominated was not found to have potential for ACEC designation based on cultural resources.

The comment nominates the area in part to protect crucial bighorn sheep habitat. BLM considered the entire crucial habitat area for bighorn sheep as a preliminary potential ACEC (draft appendix H), but did not conclude that the area warranted further consideration under this designation.

The text of the draft has been revised to include reference to the NPS proposal for White Canyon, which had been inadvertently omitted (see revisions to draft page 2-7). BLM prefers that any wild and scenic river study effort conducted be focused on the San Juan River. (See the response to comment 28, National Park Service, on this topic).

BLM does not believe that overgrazing occurs in this area, or that grazing threatens the resource values mentioned in this comment. Grazing is managed for proper utilization of forage, and there is no present conflict between cattle and bighorn sheep (draft page 3-58).

In the current RMP these values alone and together are threatened by potential road construction, up to 15,000 of potential forest chaining, potential strip mining, surface disturbance from oil and gas exploration, new range improvements, and overgrazing. SUWA knows of no other single area in the San Juan Region so unequivocally exemplary in its qualification for ACEC designation.

Valley of the Gods ACEC

(See discussion in the Visual Resources Section for more details.)

The Valley of the Gods area meets the criteria for ACEC designation for the following reasons:

Relevance:

The Valley of the Gods is relevant because it contains outstanding scenic values.

Importance:

The Valley of the Gods contains outstanding and irreplaceable scenic values. The high degree of visual sensitivity and more than local significance of the area is demonstrated by the number of people who visit this area each year for its scenic values. Both the Draft Grand Gulch Plateau Management Plan (GGPMP) and the U-95 Scenic Corridor Study acknowledge the unique values of this area. The scenic values are threatened by surface disturbance from potential development of mineral materials and oil and gas exploration and development as identified in the RMP.

The Scenic Roaded Corridor ACEC

(See discussion in the Visual Resources section for more details.)

The Scenic Roaded Corridor meets the criteria for ACEC designation for the following reasons:

Relevance:

The Scenic Roaded Corridor is relevant because of the high quality scenic values it contains.

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 77]

Valley of the Gods. This nomination is based on scenic values.

BLM accepts commentor's nomination. The draft has been revised to consider the Valley of the Gods as an ACEC under alternative D and as a special emphasis area within the Cedar Mesa ACEC under alternative E (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H, and I). Based on another comment (see the response to comment 97, Owen Severance), BLM has revised the VRM class for the Valley of the Gods (see revisions to draft table 3-14, figure 3-18, and pages 4-43, 4-57, and 4-71).

Scenic Roaded Corridor. This nomination is based on scenic values.

BLM accepts commentor's nomination. Based on the U-95 corridor study, the area qualifies for consideration as an ACEC. The draft has been revised to consider the Scenic Highway Corridor ACEC under alternatives D and E. The White Canyon viewshed has also been considered as part of the Scenic Highway Corridor ACEC under alternative E (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H, and I). (See also the response to comment 93 from Owen Severance.)

Importance:

The Scenic Roaded Corridor is important because of the outstanding and irreplaceable values it contains. The corridor is distinct because of the variety of scenery--mesas, buttes, dense pinyon juniper forests, sweeping vistas and canyon views--that can be appreciated in a variety of roaded settings, from a paved highway to a remote track. It is of more than local significance because it is one of the largest areas of relatively undisturbed high quality scenic values in the southwest. Support for this nomination is demonstrated in the draft GGPMP, GGPIMP, U-95 Scenic Corridor Study, and the Bicentennial Highway designation. The corridor is threatened by potential exploration and development of oil and gas products, locatable minerals, mineral materials, and coal, as outlined in the SJRMP.

Grand Gulch-Cedar Mesa ACEC

The Grand Gulch-Cedar Mesa area meets the criteria for ACEC designation for the following reasons:

Relevance:

The area is relevant primarily because of its outstanding cultural resource values, and also because of its natural values as they pertain to recreation, wildlife and visual resources. Each of these values can individually qualify an area for ACEC designation under the FLPMA definition.

Importance:

Each of the values listed above is singularly noteworthy. The cultural values of the Grand Gulch-Cedar Mesa area are distinct because of the high concentration and level of preservation of Basketmaker and Pueblo archaeological sites, which provide the area with a nationally significant reputation. The cultural resource values of this area are irreplaceable and currently threatened by intentional vandalism, ignorant degredation from recreation use, large areas of potential chaining on the mesas, potential mineral development, and potential oil and gas exploration and development, all outlined in the MSA and the RMP. Support for this designation is demonstrated by the area's proposed National Register District designation, the drafted GGPMP, the GGPIMP, and its national reputation for high-quality cultural resources.

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

[Comment page 78]

Grand Gulch - Cedar Mesa. This nomination is based on cultural values and on natural values pertaining to recreation, wildlife, and visual resources.

BLM accepts commentor's nomination and has considered this area as a potential ACEC in the proposed RMP and final EIS. The entire Cedar Mesa SRMA is considered for ACEC potential under alternative D, and a modified area under alternative E. (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.)

The natural values as they relate to recreation are important because of the relatively undisturbed and primitive character of most of the spectacular canyon country, as well as the unique opportunity to view cultural resources in this setting. This combination is rare within the nation as a whole. Such values are demonstrated by the high private, educational, and commercial use of the area, which in themselves threaten the natural values. Additionally, these natural values are threatened by the same activities as those listed for cultural values. The Grand Gulch-Cedar Mesa area also contains wildlife values in riparian habitat, home to threatened and endangered species. Additionally, high quality scenic values are also found within this area. These values are threatened by similar activities as those listed for the Scenic Roaded Corridor ACEC. The end.

RESPONSE TO COMMENT 9 SOUTHERN UTAH WILDERNESS ALLIANCE

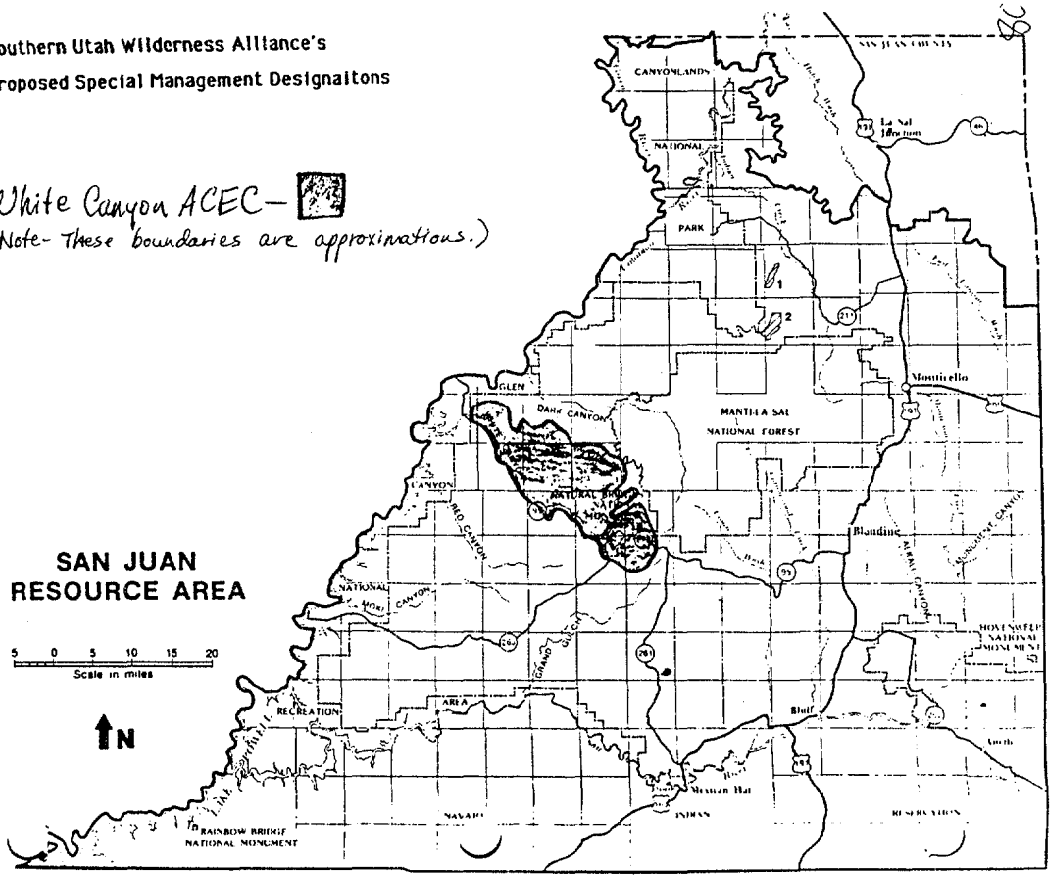
[Comment page 79]

The only known habitat for T/E wildlife species within the nominated area is in the San Juan River and related riparian area.

Change to the EIS? Yes.

Southern Utah Wilderness Alliance's
Proposed Special Management Designaitons

- White Canyon ACEC -
(Note- These boundaries are approximations.)



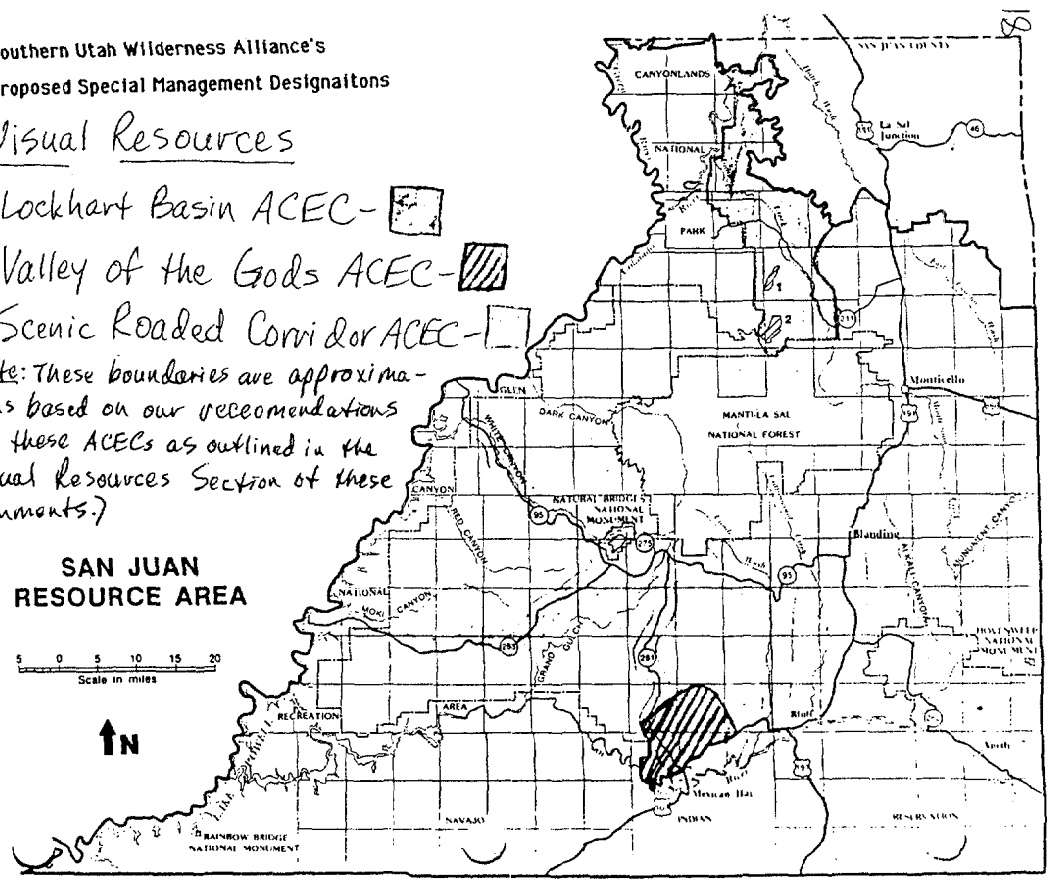
Southern Utah Wilderness Alliance's

Proposed Special Management Designaitons

Visual Resources

- Lockhart Basin ACEC-
- Valley of the Gods ACEC-
- Scenic Roaded Corridor ACEC-

(Note: These boundaries are approximations based on our recommendations for these ACECs as outlined in the Visual Resources Section of these Comments.)



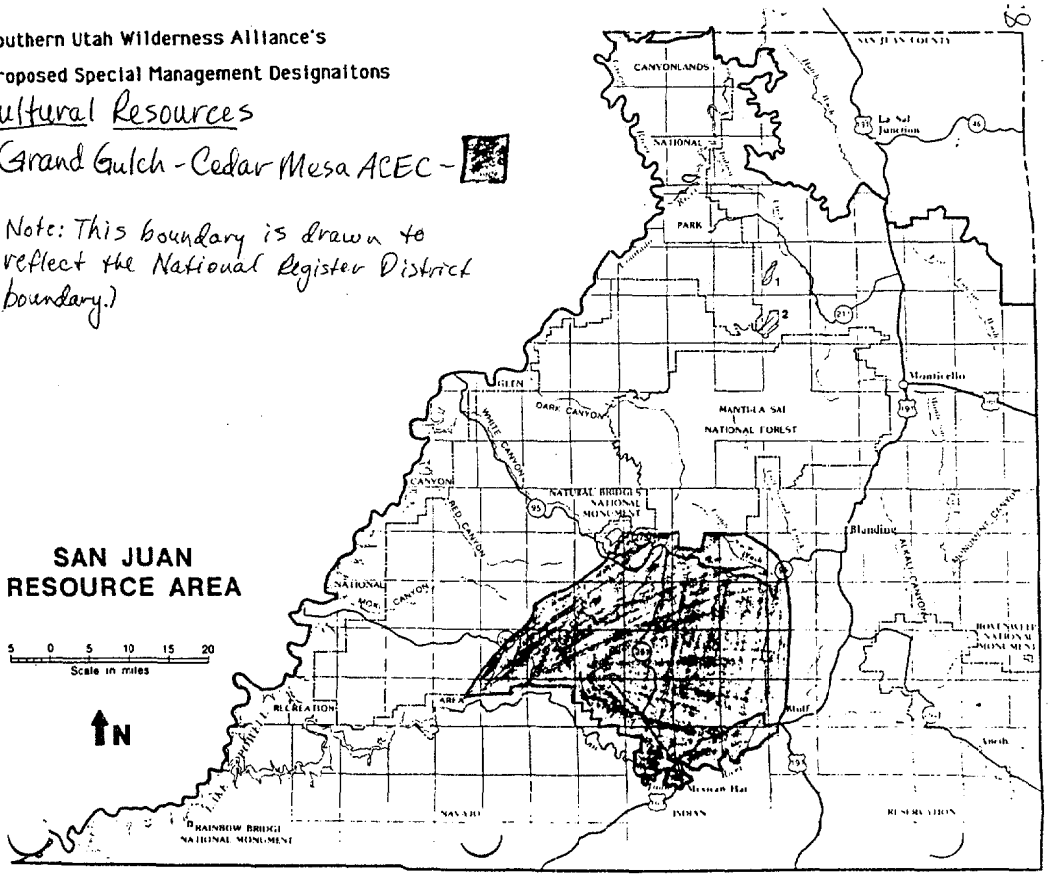
Southern Utah Wilderness Alliance's

Proposed Special Management Designaitons

Cultural Resources

- Grand Gulch - Cedar Mesa ACEC -

(Note: This boundary is drawn to reflect the National Register District boundary.)



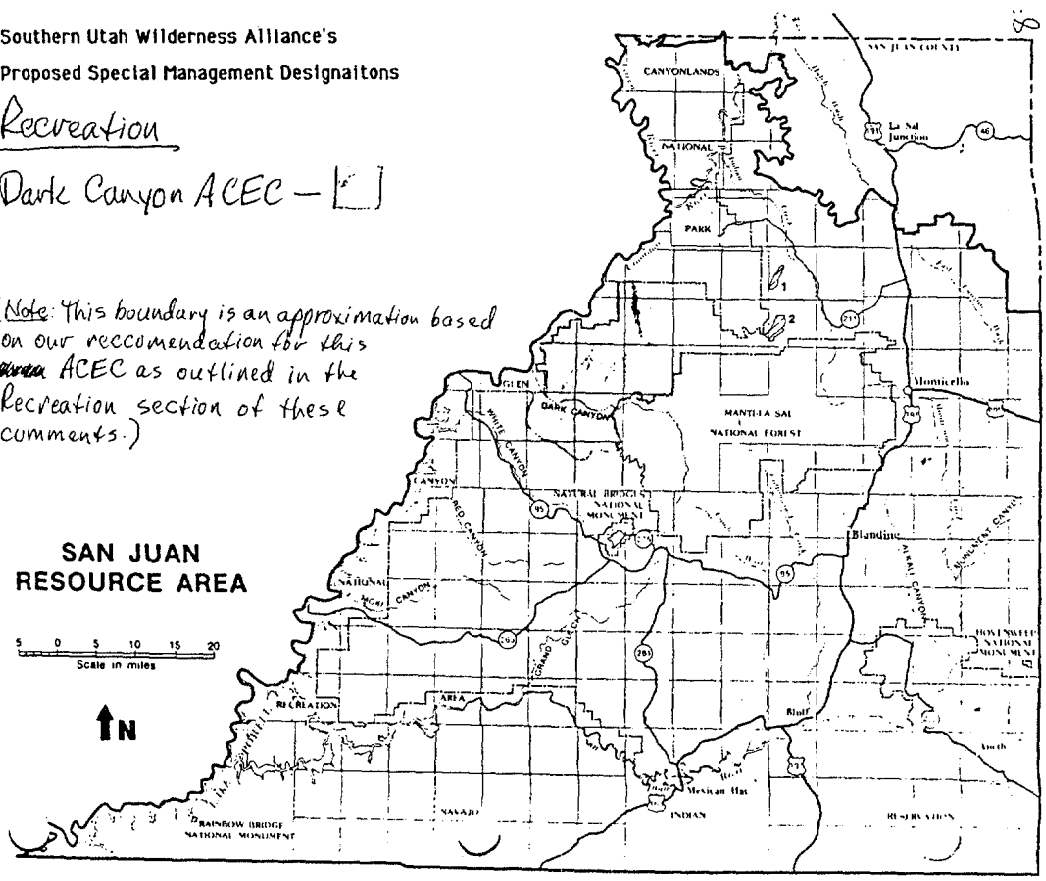
Southern Utah Wilderness Alliance's

Proposed Special Management Designaitons

Recreation

- Dark Canyon ACEC — [ ]

(Note: This boundary is an approximation based on our reccomendation for this ACEC as outlined in the Recreation section of these comments.)



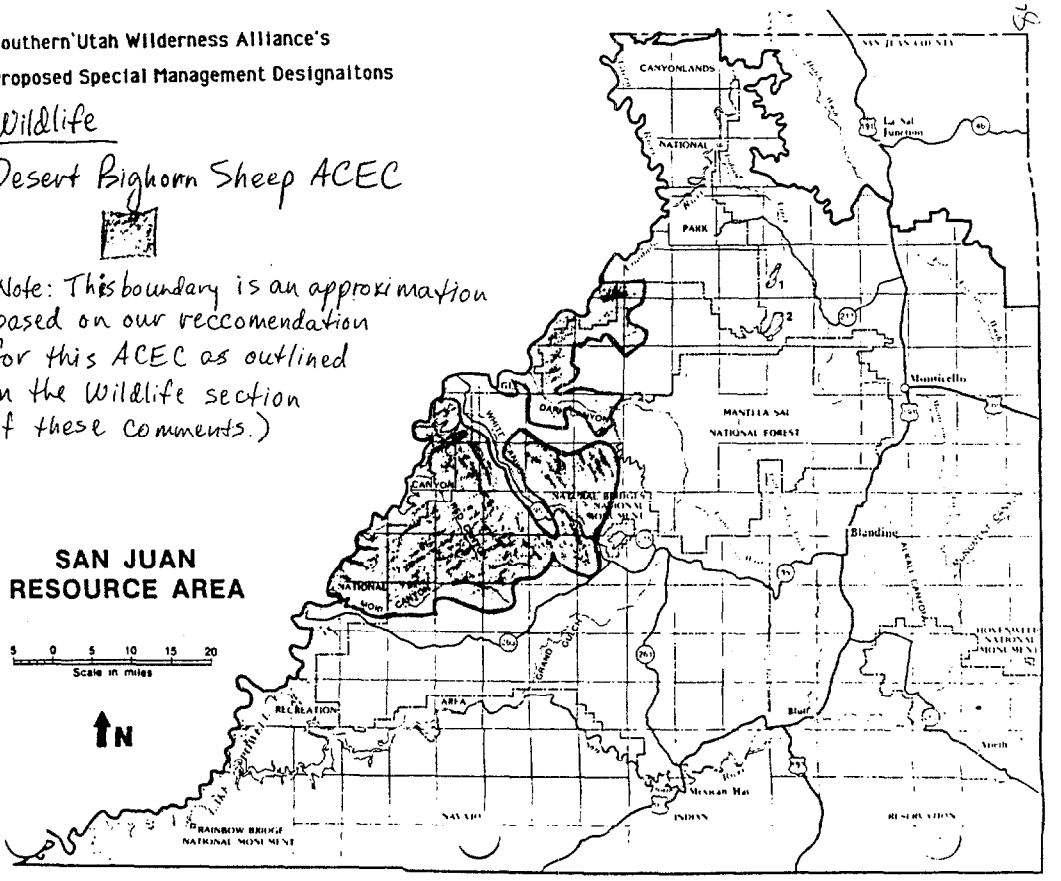
Southern Utah Wilderness Alliance's

Proposed Special Management Designaltons

Wildlife

-Desert Bighorn Sheep ACEC

(Note: This boundary is an approximation based on our reccomendation for this ACEC as outlined in the Wildlife section of these comments.)



Southern Utah Wilderness Alliance's

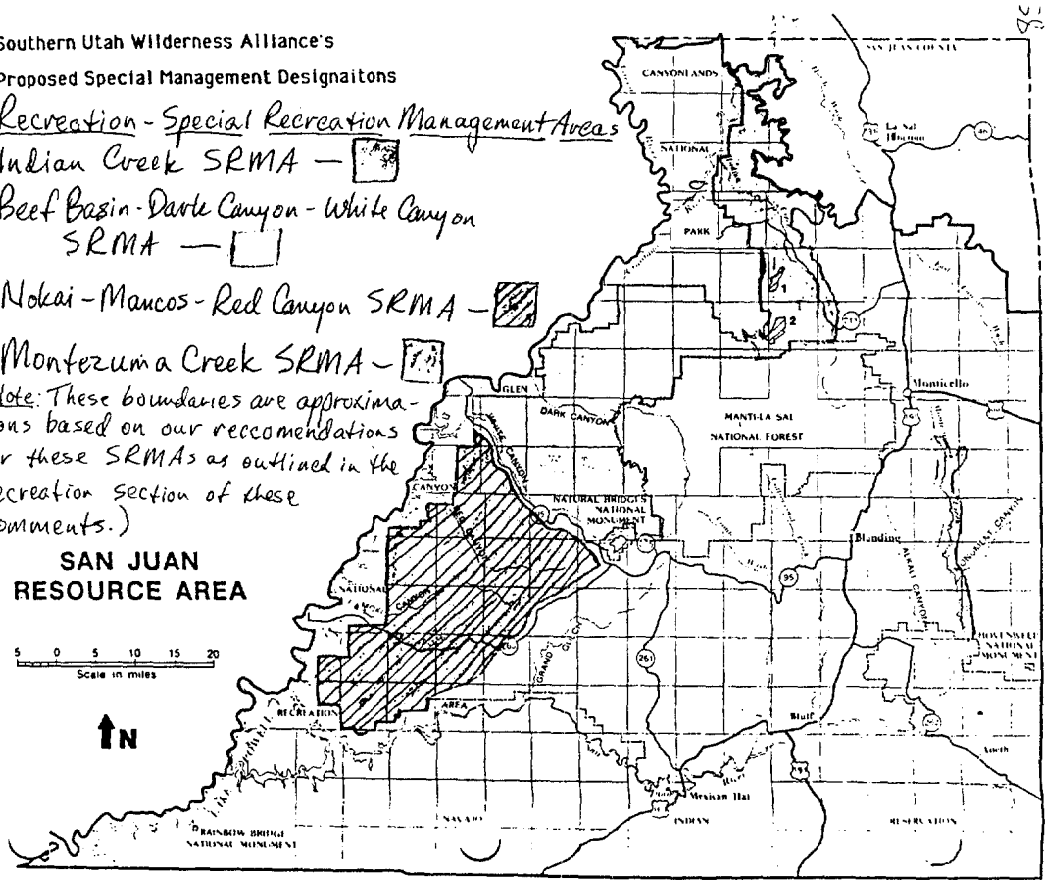
Proposed Special Management Designaitons

Recreation - Special Recreation Management Areas

- Indian Creek SRMA —
- Beef Basin - Dark Canyon - White Canyon SRMA —
- Nokai - Mancos - Red Canyon SRMA —
- Montezuma Creek SRMA —

(Note: These boundaries are approximations based on our reccomendations for these SRMAs as outlined in the Recreation section of these comments.)

SAN JUAN RESOURCE AREA



COMMENT 10

UTAH NATIVE PLANT SOCIETY

Penstemon utahensis

Reply to: P. O. Box 1555
Salt Lake City UT 84110

September 30, 1986

Ed Scherick, San Juan Resource Area Manager
Bureau of Land Management
P. O. Box 7
Monticello, Utah 84535

Re: Draft resource management plan
May 1986 EIS

Dear Mr. Scherick:

The designation of Lavender Mesa and Bridger Jack Mesa as research natural areas under the preferred alternative of the above-identified draft resource management plan is an appropriate measure that should be included in the final EIS. As noted in the draft, these areas involve relict or near-relict plant communities and they are therefore biologically important. In addition, Echinocereus triglochidiatus var. inermis (a species listed under the Endangered Species Act) is believed to occur in or near the proposed Bridger Jack Mesa RNA. The habitat of this species should be identified by the BLM and included in the potential RNA designated area (it may also be appropriate to amend page 3-37 of the draft to include this species).

In connection with table 2-5 contained on page 2-58 of the draft, it is recommended that the language for subactivity code 4352-Endangered Species Management be amended under all alternatives as follows:

"To protect and preserve all officially listed, proposed and sensitive plant and animal species and their habitats ...."

A definition of sensitive plant species is included on appendix page B-11. By definition these plant species require protection and preservation and they should therefore not be excluded from the ambit of "endangered species management."

Eriogonum humivagans was officially proposed for endangered status on April 7, 1986. In view of the critical status of this species, a specific management plan should be included in the resource management plan for the protection of this species. There is at least one occurrence of this species

RESPONSE TO COMMENT 10 — UTAH NATIVE PLANT SOCIETY

[Comment page 1]

BLM appreciates this support for designation of Bridger Jack and Lavender Mesas as RNAs. In the proposed RMP, because of a shift in BLM policy, the areas would be designated as ACECs rather than RNAs (see revisions to draft table 2-7, page 2-68, and appendix H.) However, management goals would be the same as indicated in the draft for the RNAs identified under the preferred alternative.

The text of the draft has been revised as suggested to include the species mentioned in this comment (see revisions to page 3-37 of the draft). (See also the response to comment 4, The Nature Conservancy.) The boundaries of the Bridger Jack Mesa ACEC encompass the plant habitat mentioned.

Table 2-5. The wording of this section of table 2-5 has been revised, but not as suggested in this comment (see revisions to draft page 2-58). The term "candidate species" is understood to include sensitive species, the change suggested in this comment (see revisions to the glossary).

Page B-11. BLM recognizes that the provisions of the Endangered Species Act have been extended to cover sensitive species (see revisions to draft, page 2-8). (See also the responses to comment 4, The Nature Conservancy, and comment 27, U.S. Fish and Wildlife Service.)

BLM is aware of the status of Eriogonum humivagans and is required by law to protect it and its habitat. However, the RMP was not meant to provide activity planning or recovery plans. BLM will coordinate with the appropriate agencies to determine if a recovery plan is needed. (See also the response to comment 27, U.S. Fish and Wildlife Service.) The population on Brumley Ridge occurs entirely on USFS-administered lands.

Change to the EIS? Yes.

on BLM administered land in the resource area. Further, the species may occur in the Brumley ridge area. Through consultation with the Fish & Wildlife Service, an appropriate plan should be included in the final EIS to ensure the survival of this species on federal lands.

Thank you for the opportunity to comment. We would appreciate receiving a copy of the final EIS.

Very truly yours,

UTAH NATIVE PLANT SOCIETY

Anthony J. Frates
Conservation Coordinator

COMMENT 11

UTAH NATURE STUDY SOCIETY

721 Second Avenue
Salt Lake City
Utah 84103

18 October 1986

Mr Ed Scherick
San Juan Resource Area Manager
P.O. Box 7
Monticello, Utah 84535

Dear Mr. Scherick:

In response to the draft resource management plan/environmental impact statement for the San Juan Resource Area, Moab District of the Bureau of Land Management:

The Issues Committee of Utah Nature Study Society strongly urges the Bureau of Land Management to administer the lands in the San Juan Resource Area primarily for the preservation of the cultural resources. AS many people know, the San Juan Resource Area is one of the richest areas in Utah and in the Intermountain Region with respect to the Anasazi culture. All uses of the Resource Area must be subserviant to the cultural uses.

Thus Utah Nature Study Society recommends that no vegetative manipulation occur. In the past, chaining of the pinyon-juniper ecosystem has resulted in the destruction of a multitude of prehistoric sites. Further at least one chaining may have resulted in the destruction of a 500 year old pinyon-juniper forest. Such vegetative manipulation is no longer to be tolerated. As a guideline for future manipulations, a total cultural inventory must be determined before approval of the manipulation is to occur. Second, the pinyon-juniper trees must be cored to determine the age of the forest stand. If the forest is older than the historic settlement patterns of the region, then the forest should not be manipulated (cleared).

Since Grand Gulch is rapidly becoming a very popular place for dispersed backcountry recreation, and since again the region has very high value for the cultural resources, Utah Nature Study Society recommends that the Bureau of Land Management implement a policy of registration/reservation for entry into the Grand Gulch region. Further, it is urged that the Bureau of Land Management investigate the possibility of requiring licensed guides (licensed in archeological/anthropological/ ecological values of the region) for all visitors to the region, including the dispersed backcountry users. This policy is presently in existence for Park Service caves, many Indian Reservation, Park Service archeological sites, and other places where unique values are being protected from visitor abuses.

Sincerely,

Peter Hovingh, Chairman
Issues Committee

RESPONSE TO COMMENT 11 — UTAH NATURE STUDY SOCIETY

[Comment page 1]

BLM recognizes the need to protect cultural resources. The policy and procedures for managing cultural resources are discussed in the draft on page 2-6 under Management Guidance Common to All Alternatives. BLM is a multiple-use agency and cannot subordinate all other uses of public lands in SJRA to cultural resources, as suggested in this comment (draft page 1-9).

It is true that in the past, destruction of prehistoric sites has occurred due to pinyon-juniper chainings. No new chainings have occurred on public lands within the SJRA since 1972 (draft page 3-58). Under current policy, a cultural inventory would be conducted prior to any surface disturbance for vegetation manipulation (draft page A-5).

BLM was not aware that a chaining resulted in the destruction of a 500-year-old pinyon-juniper woodland. This comment does not indicate the location nor provide details of this event. Core samples of pinyon and juniper trees in the SJRA have shown an age of 200 to 250 years for mature trees. There is no BLM policy relating to protection of trees due to age. The age of a stand would not preclude manipulation (chaining) or harvest of forest products.

Visitor use would be regulated through registration, reservations, or access restrictions at the activity plan level, not through the RMP (draft page A-29). As a multiple-use agency, BLM's mission is quite different from that of NPS, a single-use agency. Accordingly, procedures that are appropriate for the NPS would not be for the BLM, and vice-versa.

Change to the EIS? No.

COMMENT 12

Utah Professional Archeological Council
2212 South West Temple, #21
Salt Lake City, Utah 84115

August 27, 1986

Mr. Ed Scherick
San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Dear Mr. Scherick:

Thank you for the opportunity to comment on the draft resource management plan for the San Juan Resource Area, Moab District, BLM. We are pleased to see that cultural resources were addressed in the planning document. We feel that the cultural resources, both historic and prehistroic, are the greatest assests of the region. They are certainly one of the most important and valuable resources under BLM control. Since Alternative D offers the greatest protection for cultural and other irreplaceable natural resources, we feel that D is the best management alternative. Other alternatives proposed in the RMP/EIS, such as Alternatives A and B, are not acceptable since they entail increased destruction and neglect of vanishing cultural resources.

In response to some specific items in the RMP/EIS, we would like to comment on Table 3-8, page 3-63. This is a list of sites and districts potentially eligible to the National Register of Historic Places. While we agree that all of these sites and districts are eligible, we feel that this list is incomplete--the number of nationally significant sites and districts in the San Juan Resource Area is far greater than this one page list. Perhaps the reason the list is so short is the lack of cultural resource inventories in the region. Given BLM's mandated responsibility to inventory and assess its cultural resources (cf. page 2-6), we feel that BLM's greatest planning need and management tool is for cultural resource survey and assessment. In the absence of a comprehensive survey and inventory, the BLM does not have the baseline data from which to make projections and plans for the forthcoming years. Consequently, we recommend increased support of the cultural resource management program. The district and area archeologists are to be commended for working within their limited budgets and for accomplishing as

RESPONSE TO COMMENT 12 UTAH PROFESSIONAL ARCHAEOLOGICAL COUNCIL

[Comment page 1]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Page 3-38. Table 3-8 was not intended to be a comprehensive listing of all cultural resource sites potentially eligible for nomination to the National Register (draft page 3-60 states that table 3-8 lists "some of the more important sites"). Given the rich supply of archaeological sites within the SJRA, a listing of all significant sites known to BLM would be too long to include in the RMP/EIS.

In addition, new sites are constantly discovered as cultural resource inventories and clearances are conducted. The draft (page 2-6) states that any eligible site may be nominated to the National Register; this includes sites identified by organizations such as the Utah Professional Archaeological Council that are deemed to be nationally significant.

Change to the EIS? No.

Utah Professional
Archeological Council
2212 South West Temple, #21
Salt Lake City, Utah 84115

much as they do given a lack of support from higher levels of management. In the absence of increased cultural resource inventory and adequate baseline data, Alternative D which somewhat limits off-road vehicular traffic, development and disturbance, is the only legitimate alternative.

Sincerely,

Alan R. Schroedl, President
Utah Professional Archeological Council

ARS/mas

COMMENT 13

Utah Wilderness Association

455 East 400 South B-40/Salt Lake City, UT 84111/(801) 359-1337

November 2, 1986

Ed Scherick
San Juan Resource Area Manager
Bureau of Land Management
P. O. Box 7
Monticello, Utah 84535

Dear Ed:

Here are our long awaited comments on the draft RMP and EIS for the San Juan Resource Area. Frankly, I am not sure who has waited for them longer--your office or ours. True to the theory that the longer you have to prepare a comment the more likely the comment will still be finalized and sent off just under the deadline, we offer you our suggestions.

While it is true the BLM substantively lengthened the comment period, and the agency is to be strongly commended for that action, the RMP still fell within comment periods of numerous other BLM and Forest Service plans and EISs, both draft and final. It is our hope that someday the interagency coordination will include not just a few formal or informal exchange of ideas or memoranda but a serious discussion of the timing involved in releasing a number of major documents and asking for public comment or review during the same basic time frame. To have to comment on the BLM wilderness review, at least two BLM RMPs (the final recommendations), three Forest Service forest plans (final review) and a host of other major EISs or EAs during the same five to six month period makes public review a bit hectic. We certainly aren't asking for longer reviews of RMPs, particularly this one, but I hope you understand our broader concerns.

Onto the comments on this RMP. In many ways it is the best RMP our office has seen. It appears to represent a solid and comprehensive view of the resource area. One can't complain about the array of alternatives (for the most part--there is one major discrepancy in the grazing array of alternatives) as they seem to clearly depict different management strategies. And certainly, as I've already noted, the time was made available to understand the thrust of each alternative. Many of the other RMPs we've commented upon have had rather silly and canned alternatives.

On the other hand the RMP is punctured with both the specific and generic inconsistencies which seem to plague the BLM planning effort. In part it appears to be simply the mass of data gets lost during the writing process. In other instances it appears this RMP is so dedicated to meeting absolutely every constituent concerns that it is a plan for all concerned at all times regardless of what the data base maintains. At other times the plan simply makes no resource sense and fails to explain the direction it is attempting to take.

For example, Alternative E (the preferred alternative) makes a number of ACEC recommendations for areas that in Alternative D or C receive ONA recommendations. It is never clearly stated why the difference in special management area designation. Thus in some instances we are being asked to compare apples and oranges in terms of designation, despite the fact the land base is the same in each alternative. This needs a clear policy statement.

RESPONSE TO COMMENT 13 — UTAH WILDERNESS ASSOCIATION

[Comment page 1]

BLM appreciates this support of the draft RMP and its array of alternatives.

Appendix H of the draft has been revised to clarify the rationale for selecting or not selecting areas for proposed ACEC designation. Because of a change in policy, BLM has dropped the ONA designation in favor of the ACEC designation.

Nov. 2
page 2

Furthermore, even with the special designations which are carried through the alternatives (C,D,E) there is not a clear explanation of why the different acreages exist or more importantly what tradeoffs are made within that special designation based on the different acreage allocations per alternative. The best example, of course, is Alkali Ridge. It is a proposed ACEC in each alternative, recognizing special cultural values while mitigating development activities to protect such cultural values. The preferred alternative proposes only abut 25% as much acreage as the Alternatives C and D. What is lost as a result of such a small ACEC proposal in the preferred alternative?

Another interesting concern that makes its appearance in the plan is the discussion of soil loss in the plan as reviewed in summary of alternatives charts. It is noted, for example, that soil losses would decrease over the planning horizon from Alternative A. This is basically attributed to a reduction of grazing in some sensitive areas and on some mesa tops. Such grazing reductions are needed and to be commended. It is obvious from the soils discussion and the range discussion grazing is being conducted at the expense of other resources (see discussion on grazing).

However, it seems the soil loss chart fails to consider impacts to soils based on other significant surface disturbing activities which are being allowed to increase in the preferred alternative. For example, mineral leasing in categories 1 and 2 will be allowed on an additional 150,000+ acres. Ironically, it is assumed this additional acreage will produce an unquantified, but insignificant, amount of oil and gas. However, if full development were to occur on this additional acreage-and that is a possibility--any other planning assumption could lead to an underestimation of environmental impacts which would jeopardize other resource outputs contained in the preferred alternative. Soil loss is a classic example--soil loss would likely be much higher as both the plan and MSA note significant problems exist with soils on the resource area.

Also, the soils chart likely fails to consider the loss of soils due to ORV use even though the RMP reduces the number of acres open to ORV use (and that is one of the strong points in the RMP!) it still fails to actually consider the impact to soils as a result of ORV use.

Another inconsistency is the treatment of the five mesa tops identified as important to bighorn sheep. To assure such large undisturbed tracts of land the RMP makes a positive allocation of excluding grazing. However, ironically the RMP preferred alternative doesn't eliminate the potential for major mineral development. Study after study has shown (many of them are actually cited in the RMP and MSA) such extensive human activity as mining has a significant and detrimental impact on every phase of bighorn sheep survival. Restrictions are placed on the bighorn sheep habitat (and some of the habitat is closed due to ACEC or ONA proposals, depending upon the alternative) and appear to follow seasonal restrictions. This fails to address the problem of development based upon exploration work, which is actually restricted, as noted on a seasonal basis. Furthermore, seasonal restrictions fail to look at the habitat as a whole. With respect to sheep it has been noted that even minor disturbances may move the population to alternative habitat (if it exists). It seems only logical that if the area is closed to grazing due to conflicts with domestic animals (disease and social aggressiveness, etc.) and the human presence associated with such domestic grazing that all of the mesa tops identified in the RMP and the rest of the crucial/critical habitat not protected through some other allocation should be closed to mineral development.

RESPONSE TO COMMENT 13 UTAH WILDERNESS ASSOCIATION

[Comment page 2]

BLM appreciates this comment's support for grazing reductions and ORV use limitations presented in the preferred alternative.

The estimated changes to soils loss between different alternatives were based on the assumptions given in draft chapter 4 under each alternative. Although the number of acres open to lease would increase under alternative E, it is assumed that the special conditions presented in appendix A would be applied (draft page 4-2). Soils loss depends on surface disturbance (draft page 4-11). The acres of surface disturbance caused by oil and gas lease development was assumed to be the same under alternative E as under alternative A (draft page 4-61), although the acres of disturbance caused by geophysical exploration was assumed to be less (draft pages 4-61 and 4-65).

ORV use may be either recreational or nonrecreational. Minerals exploration and development is the major nonrecreational use; off-road use was considered in the total surface disturbance estimates for minerals. Surface disturbance caused by ORVs off existing roads or trails was assumed to be included or overlapped by disturbance from other activities (draft page A-185). The draft analyzed only measurable changes (draft page 4-2).

The draft summary inadvertently indicated that seasonal restrictions would be applied to development under alternative D instead of alternative E (see revisions to draft table S-1). The intent of the preferred alternative was to apply seasonal restrictions to all developmental activities in crucial wildlife habitat (draft figure S-4). The bighorn sheep habitat was examined under the different alternatives to determine what level of restrictions might be necessary to protect the sheep (see draft chapters 2 and 4). BLM is obligated to apply the least restrictive level of stipulations to oil and gas leases necessary to resolve resource conflicts (76 IBLA 395 (1983)); the draft impact analysis (chapter 4) did not justify the need for a higher level of restriction (closing bighorn sheep habitat to mineral development).

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The same irony and inconsistency exists in the grazing program as it interacts with the bighorn sheep populations. Though the preferred alternative professes a desire to increase the bighorn population by about 200 animals it also proposes to increase livestock use "in the crucial habitat areas, which would increase competition for forage on winter range, possibly decreasing bighorn populations." This revelation raises two substantive problems. First, it seems a logical inconsistency to prevent grazing on 17% of the crucial habitat (five mesa tops identified in the preferred alternative) and argue this small action will increase the populations of bighorn in the region. On the other hand, and after a good discussion which does show grazing is a "threat" to bighorn populations, the preferred alternative increases livestock grazing on other important components of the crucial habitat. The implication being increased grazing or maintainence of grazing will occur on 83% of the crucial habitat and possibly reduce populations. How can this be?

Second, it does also reveal one of the substantive problems of the whole planning process which we have already raised. That is many of the actual decisions seem to be pulled out of thin air. What data exists to actually show the 200 sheep will "come about" given the fact that increased grazing on crucial habitat will take place and given that mineral activities will be allowed to take place?

The RMP does a commendable job in providing an array of alternatives discussing management of wilderness study areas that do not receive congressional wilderness designation (assuming Congress does not designate all of them). However, the RMP makes a fatal flaw here as it generally assumes no other tracts of land deserve any special protective mechanism similiar to ONA or ACEC designations. Areas such as Mikes Canyon or Nokai Dome should be considered for actions which would maintain the undeveloped character of that area. The RMP should not worry that such a management recommendation would indicate the BLM wilderness review was insufficient as the RMP and planning process is outside and more important than the wilderness review.

With respect to the wilderness study areas we make this suggestion which will ease and consolidate the RMP effort and direction. Since the BLM has made a preliminary suitable designation for San Juan Resource wilderness study areas we suggest these areas be proposed to be managed under the primitive ROS. Mineral management would be constrained based on the natural values identified (and for the most part identified as having low mineral values as identified in the wilderness EIS, this RMP and the MAS) and limited to no surface occupancy or hardrock mineral segregation. It is clear from the plan and MAS this would have negligible social/economic impacts due to the limited volumes and supply of oil and gas and the very small quantities of an already terribly depressed uranimum market. Other surface disturbance activities such as grazing would be constrained by dictates from other multiple use resources such as riparian quality, bighorn sheep habitat and conflicts with other user groups such as backcountry users.

The areas not recommended as suitable but identified as wilderness study areas should be managed under the semi-primitive non-motorized ROS. Based simply upon the ROS this would allow a management intensity a bit less than the primitive allocation. Since the areas harbor no appreciably different mineral values mineral management would be no less restrictive. Grazing management could be a bit less restrictive as long as all multiple use resources were considered equitably in the allocation process. Under no conditions would these two allocations change the proposals the BLM has made and we have augmented with respect to grazing and mineral developments upon bighorn habitat.

The logic of such recommendations is exceedingly obvious. These areas have been long identified (some much longer than the present wilderness review) as harboring important nautral values which should not be subjected to any significant development proposals. Any other allocations cast a doubt on the integrity of the entire planning process.

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[Comment page 3]

Under the preferred alternative, the draft does not express a desire to reach a given bighorn sheep population goal, nor does it propose to increase livestock use in crucial habitat areas, as stated in this comment. The immediate and potential impacts from grazing are only one of many positive and negative impacts to bighorn sheep. When all increases and losses are combined, the net result is an increase of 200 animals in the bighorn sheep population (draft page 4-66). As a result of public comments, the population impacts have been revised (see revisions to draft table 2-10).

As noted earlier, this comment cites impact projections rather than proposed plan decisions. The assumptions used to project impacts to wildlife populations, given in chapter 4 under the different alternatives, represent application of field data, the studies cited in the draft, and professional judgment. All impact analysis, by nature, involves projections and assumptions.

The draft indicates that under alternative E, management to protect P and SPNM ROS classes and seasonal restrictions of surface-disturbing activities would be responsible for the majority of the increase to bighorn sheep populations; livestock would be excluded from mesa tops and the Dark Canyon ACEC, or about 36 percent of the bighorn crucial habitat area. The draft indicates (page 3-58) that there is currently no conflict between cattle grazing and bighorn sheep. No actual loss of animals has been projected due to the possibility of increased livestock use in part of crucial habitat areas; this has been clarified in the final EIS (see revisions to draft page 4-66).

BLM appreciates this support of the array of alternatives for management of areas under wilderness review. Based on this comment, BLM has re-evaluated the Nokai Dome area for ACEC potential, and analyzed the area as a potential ACEC under alternative D (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I).

The draft (page 1-2) discusses management of WSAs and ISAs if released from wilderness review by Congress. It is assumed that areas released by Congress from wilderness review would be managed for nonwilderness purposes. Therefore, BLM did not attempt through the RMP to protect wilderness values in areas released from wilderness review, even those found to be preliminarily suitable for wilderness designation in the statewide wilderness EIS, or to protect wilderness values through application of ROS classes.

BLM appreciates the suggestion regarding application of ROS classes to wilderness review units, depending on preliminary suitability recommendations. However, BLM prefers to apply management prescriptions to protect P and SPNM ROS clases where indicated in alternative E, regardless of wilderness suitability. This level of management is believed adequate to protect existing primitive recreation values and related scenic values, and would retain the integrity of the planning process.

Of course, inherent in this recommendation is the suggestion that all of these areas be closed to all ORV use, including ORV use on existing trails. It simply is an impossibility to leave these areas open to ORV constrained to the trail system--once on the trails there generally is no controlling indiscriminate ORV travel. As importantly, many of the areas are subject to travel only in canyon/wash bottoms and if opened to ORV use a consistent and continuation of the user conflicts will occur. The goal of this planning process is to mitigate those problems as much as possible. Since the areas in this discussion have no roads and few ORV/resource values other than the natural/cultural values no significant tradeoffs are likely.

Grazing/Livestock Management

One positive aspect of the SJRMP is the identification of wildlife and livestock grazing as major issues. They are important resources needing a thorough analysis in the RMP.

One of the biggest omissions in the RMP and EIS is the lack of analysis of a no-grazing alternative. The rationale given on page 2-9 is because other alternatives consider where grazing use conflicts with wildlife, recreation use or vegetation management and excludes grazing in specific areas under various alternatives. However, this is not the case.

There is no analysis in the EIS or RMP of restricitng grazing based upon cultural resources. These resources are significantly affected by livestock grazing, particularly where physical damage occurs to structures. Also, many wildlife areas are not free from grazing. Virtually every allotment (see appendix U) has some grazing under every alternative. Figures 3-11 asnd 3-12 show that nearly the entire resource area is habitat for wildlife -- the west is used extensively by bighorn sheep and the east by deer and antelope.

The refusal to analyze the no-grazing alternative was premature and based upon faulty assumptions. Such an alternative is valuable in assessing the impacts of domestic grazing upon other resources. Without that baseline, it is impossible to tell what potentials the other resources have. It is particularly critical to have such a baseline in a resource area, like the San Juan, that is so important for wildlife, recreation and cultural resources. (Note. The SJRA has the most desert bighorn in Utah, page 3-42; 480 miles of riparian zones, page 3-49, and one of the "richest locales" for archaeological resources under BLM management, page 3-60)

[Comment page 4]

BLM has no data to indicate that indiscriminate ORV use occurs within wilderness review areas. The P and SPNM ROS classes cover the majority of acreage under wilderness review. Under the prefered alternative, P areas would be closed to ORV use; SPNM areas would have ORV use limited to designated roads and trails within SRMAs, and to existing roads and trails outside of SRMAs. Riparian areas, which include canyon/wash bottoms mentioned in this comment, would also have ORV use limited to existing roads and trails. BLM agrees that it is the role of the planning process to mitigate potential adverse impacts as much as possible.

Grazing/Livestock Management

A no-grazing alternative was not analyzed because it was not thought to be reasonable. As noted in this comment, exclusion or reduction of grazing was analyzed under each alternative in response to specific resource conflicts. BLM is under no obligation to assess a no-grazing alternative where livestock grazing is a historic use in the area, and where this type of alternative would be infeasible and unreasonable (Natural Resources Defense Council Inc., et al. v. Hodel, 624 F.Supp. 1045 (D.Nev. 1985)). Further, alternative A presents the environmental baseline against which impacts are measured. Where past grazing has already occurred, a no-grazing alternative does not present a baseline, as suggested in this comment; rather, it presents a speculative scenario based on the abolition of an existing use (Ibid).

Impacts to cultural resources from current grazing management indicate that about 4 percent of cultural resource site damage is caused by livestock trampling or grazing management (draft page 4-16). The relationship between grazing management and cultural resource site damage was discussed in the draft: the impact analysis for alternative B (page 4-27) indicates an increase in grazing-related site damage; for alternative D (page 4-56) a decrease in grazing-related site damage. Alternative D specifically provides for the maximum protection of cultural resources (draft page S-4 and table 2-5). Accordingly, grazing disturbance was reduced under this alternative to the greatest extent needed to protect cultural sites; however, a complete ban on grazing was not believed necessary to achieve this.

Wildlife and livestock use the same areas in much of SJRA. This does not necessarily mean that there is a conflict between the two. Where conflicts are known to occur, or where the potential for conflict exists, the impacts were projected in the draft (page 3-58, as revised). In the EIS alternatives, options for resolving these conflicts include grazing exclusions, seasonal restrictions on grazing, range improvements, land treatments, and management under AMPs to mitigate or avoid potential adverse impacts.

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The alternatives selected do include some positive and inovative steps that could be adopted in the preferred alternative without significantly change. For example, the Natural Succession Area concepts could be applied to alternative E in many areas. Much of the terrain slated for Natural Succession Areas is, in fact, ungrazed at present due to rugged topography, inaccessibility etc. Using sound range management principles coupled with what appears to be a stable or decreasing demand for livestock forage could improve range condition in many area through natural succession.

Although the goals of the alternatives are, in many cases, commendable, the EIS and plan are flawed by inconsistencies in management direction. These problems are found throughout the document.

The analysis concerning ecological condition is confused and misleading. The goal for alternative D is to increase ecological condition through natural sucession. However, the ecological conditions projected for important allotments in succession areas are lower for alternative D than they are for alternative B which maximizes grazing resource use (see Slickhorn Allotment, appendix T). How can this be? The only logical answer is the BLM's confusion in substituting the amount and quality of forage available to livestock (an example would be a crested wheatgrass seeding which is technically in the earliest possible seral stage because it is not part of the native biota) for ecological condition, which is an indicator of successional stages, not the amount of forage. A similar problem is repeated in allotments in alternative E which are slated for livestock reductions.

Page 4-2 indicates that alternative E has the highest reduction in livestock grazed acreage yet more forage will be provided and ecological condition will increase overall (page 4-66). How can this be?

It will take vegetation manipulation projects to increase forage for livestock and alternative E has the second highest amount scheduled, a whopping 241,960 acres (page 2-68). However, alt. E (page 2-51) has the second lowest management cost for grazing and for range improvements which is less than 10% of alternatives C and D! This cannot be given the number of acres identified for range improvements in alternative E.

Even the acreages for range improvements are inconsistent. The figure given on pages2-47 and 2-68 is about 40 times higher than the cumulative total for new land treatments under alternative E found in appendix U (241,960 acres v. 6,600 acres) and different again from the numbers found on page A-193 in

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[Comment page 5]

BLM agrees that the natural succession concepts presented in alternative D could have some merit in application under alternative E, and they may be incorporated under activity plans. These concepts are probably in effect at present because of minimal disturbance, from human activities or livestock grazing, in many remote areas. BLM believes it would be difficult to apply these principles to broad areas under the preferred alternative; management of P ROS class areas under alternative E is very similar to the management prescriptions for the natural succession areas (appendix A).

BLM has revised the ecological condition discussion in the proposed RMP and final EIS (see revisions to draft table AT-1).

The potential land treatments shown in the draft are areas that are physically suitable for land treatments, not scheduled projects. The draft has been revised to clarify this, and to indicate that priority would be given to maintaining existing land treatments before new treatments are made (see revisions to draft page 2-6 and table 2-7).

The estimated management costs shown in the draft for grazing and range improvements were in error and have been corrected (see revisions to draft table 2-4). See the response to comment 9, Southern Utah Wilderness Alliance, comment page 4, on this topic.

The figure 241,900 acres is the total gross acreage with potential for land treatment under alternative E. The 126,800 acres is net the amount assumed to be treatable when areas are deleted to mitigate adverse impacts to poor soils, cultural sites, or visual resources. This figure has been changed to 121,880 acres in the proposed RMP and final EIS (see revisions to draft page A-193). The 6,340 acres is the area estimated to be treated by the year 2000 (the analysis time frame), or 5 percent of the 126,800 acres (draft chapter 4 and appendix W). Please note that 6,340 acres has been changed to 6,090 acres in the proposed RMP and final EIS. BLM does not believe these figures are inconsistent.

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appendix X (126,800 acres and 6,340 acres). All of these inconsistencies cast serious doubt on the credibility of the RMP and EIS.

Other problems exist with the proposed land treatments. Page 2-47 shows the majority of them located on Cedar Mesa, an area of extreme archaeological importance. This is contrary to the direction and goals of alternative E, which has identified cultural resources as particularly important. In addition, land treatments appear to be schedueld in areas that have been left for bighorn sheep (north of Natural Bridges National Monument). Why?

The problem is simple, there is not any consistent indication of where vegetation manipulations projects are indeed planned and therefore, no analysis of the impacts to other resources.

A big problem with the grazing discussions revolve around use figures. Nowhere in the RMP are figures given for actual use versus licensed use. Without a baseline of what real demand there is for public rangeland forage, it is impossible to fairly analyze and allocate the important forage resource between livestock and wildlife. What is the past actual use for the past 5 years? Is it different than licensed use?

This problem becomes more apparent as one looks at the "benefits" to wildlife from closing certain areas to livewtock. For example, the AUM loss for livestock (appendix X page 193, alt. E) is listed as 264. However, there is no indication these areas such as Dark Canyon have had any actual livestock grazing the past few years or that the actual use by livestock was 264 AUMs of forage. Therefore, any benefit to wildlife from "closing" an area to livestock use, which may not have actually been used, is dubious. The reality is stated on page 4-66 regarding bighorn sheep:

> "livestock use would increase somewhat in the crucial habitat areas,which would increase competition for forage on winter range, possibly decreasing bighorn populations."

The analysis on alternative E masks the real impacts of the alternative. The evidence points to no real benefit to wildlife. Although protecting ROS P and SPNM recreation areas in bighorn habitat is commendable, most of these areas currently receive little or no disturbance. Therefore, this alternative <u>maintains</u> the current situation for bighorn sheep, it does not improve it.

The analysis of forage allocation is lacking. The RMP does note, and rightly so, the impacts of domestic stock on wildlife. However, it does not compare forage demands between wildlife and livestock. We are not told the "allocation" of

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[Comment page 6]

As noted above, the draft shows areas that are physically suitable for land treatments, not proposed projects. Land treatments would be possible over much of Cedar Mesa. (Management prescriptions for most of Cedar Mesa have changed due to the proposed Cedar Mesa ACEC; see revsions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.) It is assumed that the NEPA document prepared for a specific project (draft pages 2-1, A-1 and A-29) would identify mitigation for adverse impacts to other resource values, such as cultural resources. Potential mitigation measures might include using herbicides or fire to accomplish land treatments, or leaving buffers (islands) around cultural sites if mechanical means were used. On Cedar Mesa, it was assumed that up to approximately half of the potential acreage could potentially be treated if mitigation for cultural resources was applied.

The map of potential land treatments for alternative E (figure 2-15) incorrectly shows potential treatments on part of the mesa tops designated for protection as desert bighorn sheep habitat (see revisions to draft figure 2-15). The incorrectly mapped areas include approximately 700 acres on Jacobs Chair Mesa and 1,200 acres on Found Mesa. Acreages shown in the tables and the narrative of the draft did not include these areas, and so have not required revision.

Actual use figures were not available for all allotments for the 5-year period used for licensed use (draft page 3-54). In most cases, actual use is the same as licensed use. Present demand is discussed on draft page 3-54.

Most of the areas excluded from livestock grazing under alternative E have been grazed in the past. The mesa tops used by bighorn sheep, along with Bull, Imperial and Fable Valleys in the Dark Canyon Primitive Area, are presently grazed by livestock. Therefore, closing these areas to grazing would not maintain the present situation. Instead, this would cause a loss of AUMs available to livestock; it is assumed that this would result in a beneficial impact to wildlife (draft chapter 4). The statement from draft page 4-66 quoted in this comment has been revised (see discussion above).

Wildlife use of existing forage is shown for big game species by number and season in table AO-1. Wildlife AUMs can be derived from this table. However, even if table AO-1 did list AUMs for wildlife as well as livestock, the determination as to whether a "fair" balance exists is a subjective judgment. The final BLM determination of allocation of forage to livestock will be based on the 5-year range monitoring studies (draft page 2-6 and appendix J).

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forage to wildlife yet we are given the licensed use for livestock. How does the public know there is a "fair" balance in forage allocation without the data?

Riparian area management to exclude livestock in alternative E is excellent (page A-20, appendix A). However, there is no indication how livestock will be excluded from these areas. Will all riparian areas be fenced or what other management tools will be used to prevent livestock from utilizing riparian areas.

A real problem in the resource area is the season of use. It has been recognized by the BLM as contributing to deteriorating range conditions in some areas. Summer use would be allowed on 24 allotments, yearlong use on 4 allotments and spring use on 35 allotments. How can conditions improve when grazing use will be allowed on so many allotments during critical phenological periods?

The allotment categorization is a cause for concern. Becasue the resource area is so important for many natural values, no allotments should receive a C classification. All allotments should be either in the M or I category. A good example is the Church Rock Allotment (C). It is heavily visited by tourists going to Canyonlands National Park and is not in good condition as noted in appendix T.

Economics

The analysis of recreation economics is commendable by the fact it appears as a significant factor in the RMP. There is no doubt recreation is an important industry as is admitted on page 3-100. However, the attractions of the San Juan Resource Area do not only benefit San Juan County, but neighboring areas as well. This should be noted in the analysis. Other resources (ten percent of the livestock permittees reside outside of San Juan County) receive this type of analysis and so should recreation.

Table 3-19 is confusing in its recreation analysis. It shows a great deal of income generated from recreation in San Juan county yet allocates only 7% of this to the resource area even though it covers most of the county. With attractions like the Grand Gulch, San Juan River and U-95, why is this figure so low? The analysis on page A-140 (appendix R) admits the unreliability of BLM recreation figures. Without accurate RVD figures and appropriate values assigned them, the recreation analysis lacks the detail of other resources.

[Comment page 7]

Draft appendix A incorrectly indicated that grazing would be excluded from all riparian areas under alternative E (see revisions to draft appendix A). Grazing may be excluded in selected riparian areas, under AMPs (to be developed) for improved riparian condition. Where required, exclusions would be accomplished using fencing, natural topographic barriers, or grazing systems that would allow periodic rest and recovery of riparian areas.

Season of use is a problem only if grazing occurs each year on the same area during periods of critical plant growth. Where grazing is rotated so that part of the allotment receives rest regularly during the critical period, plant vigor can improve; however, the allotment as a whole would show use during that season.

As noted on draft page 3-54, only 2 percent of the allotted acreage in SJRA is in category C. (The criteria for categorizing grazing allotments were given in draft appendix D.) Generally, allotments in the C category are small (some have little federal acreage) and have no serious resource conflicts or problems. The Church Rock allotment, although seen by visitors to Canyonlands NP, contains only 160 acres of BLM-administered land. The incidence of tourists traveling the highway to Canyonlands NP would not constitute a serious use conflict in this area. The remaining 4,500 acres are private or state lands, over which BLM has no control.

Economics

The draft discussed only significant or potentially significant economic effects (draft page 4-19 and appendix R). The criterion for significance was a 1 percent change to an economic indicator (such as employment, income, or tax revenues) for an individual, business, industry, community or region.

Recreation-related and grazing-related economic effects cannot be be treated in the same way. Livestock operators who use the public range in SJRA but live outside the resource area were included in the economic analysis because they could be significantly affected. The counties in which these operators live were not included in the analysis because the counties would not be significantly affected. Expenditures associated with recreational use of the SJRA extend beyond the boundaries of San Juan County; however, these expenditures do not meet the significance criterion for the outside area and so were not included.

Nonpublic land areas in San Juan County that receive significant recreation visitation include Canyonlands NP, Natural Bridges NM, Hovenweep NM, Glen Canyon NRA, Manti-LaSal NF, and Monument Valley Tribal Park on the Navajo Indian reservation. These areas are federal lands, but are not part of the public land base assessed in the draft (page I-17). In addition, an estimated 50 percent of the visitors traveling through the area are en route to a destination outside of the SJRA (draft page 3-100 and appendix R, page A-140).

As noted in this comment, recreation use figures are unreliable; however, they are the best figures available. Data availability and reliability varied by resource (see MSA, Data Gaps in each section of part II). Consequently, the amount of detail in the impact analyses varies by resource program.

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The economic analysis of livestock operations make one important point -- the capitalization value of grazing permits (page 3-100). Although not recognized by BLM (it should be) this points out the publics' subsidy of certain uses of the public lands by the the dollar values attached to BLM grazing permits. This underscores the need for land managers to make decisions in the publics' interests.

Cultural Resources

One of the major failures in the plan is the omission of cultural resources as an issue. We have detailed this in previous letters to the San Juan Reousrce Area office. Although cultural resources are mandated to be manged under applicable laws (the BLM's justification for not selecting them as an issue), the agency does have discretion on how to interpret the laws and manage the resource. There is no question cultural resources meet the definitions of planning issues on page 1-1, reach a critical threshold in ten years (MSA 4331-21) and meet the "Problem ID" under numbers 1 and 5 (page 1-9). It is ironic alternative D is based upon cultural resources even though they were not identified as an issue.

No one disputes the importance of the cultural resources in this area. However, the managment of this important resource has been lacking. It is apparent the present activities are not sufficient to meet the needs of the resource.

Although greater expense may be involved in managing cultural resources under alternatives C and D, it is still less than half of the grazing managment funds for those two alternatives. Cost saving measures can be taken to protect cultural resources. Past suggestions have included hiring local people for horseback patrol (less expensive than the cost of motorized equipment, particularly helicopters).

It is important to recognize that just because an area has been selected as a National Historical Register Site or selected for special protection for cultural resources does not mean it will be protected. Management prescriptions must be planned and implemented for these areas.

Several important areas need protection for their cultural values. Of course, the WSAs in Cedar Mesa and surrounding terrain are important for cultural resources. The SRMAs, ACEC's, ONAs and national register properties identified in alternative D (see pages 2-27 and 2-37) and additional terrain between U-95 and Dark Canyon need management emphasis for their cultural resources .

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[Comment page 8]

BLM agrees that land managers should make land-allocation decisions in the public interest.

Cultural Resources

BLM recognizes the need to protect cultural resources. Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1); however, management of cultural resources was noted as a managment concern (draft page 1-6). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

Estimated grazing costs shown in table 2-4 were in error (see revisions to draft table 2-4). The estimated costs for grazing management are less than the estimated costs for cultural resources management under all alternatives except B.

BLM agrees that specific management prescriptions are needed to protect National Register sites. These prescriptions were developed in the draft and are presented in appendix A for each alternative (appendix A has been revised).

BLM has re-evaluated the areas suggested in this comment for ACEC potential to protect cultural resources. The potential ACECs considered in the final EIS under alternatives D and E have been extensively revised (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I).

Cedar Mesa is considered as a potential ACEC under alternative D, and a slightly smaller area as a proposed ACEC under alternative E. The area between Dark Canyon Primitive Area and U-95 is considered as part of the White Canyon potential ACEC under alternative D, and part of the area is within the proposed Scenic Highway Corridor ACEC under alternative E. The area around Hovenweep NM is proposed for ACEC designation in the proposed RMP. Special conditions have been developed for all potential ACECs. These are considered to provide the greatest level of restriction necessary to protect the values at risk.

Other areas mentioned in this comment (shown in revised figure 2-5) are proposed for ACEC designation under the proposed RMP to protect values other than cultural. Part of the Lockhart Basin potential ACEC has been proposed as the Indian Creek ACEC to protect scenic values. The two potential RNAs shown in figure 2-6 are proposed for ACEC designation. The Alkali Ridge potential ACEC shown in figure 2-5 was not revised; the smaller area shown in draft figure 2-6 remains a part of the preferred alternative.

BLM has dropped the ONA designation in favor of the ACEC designation.

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Stipulations (such as NSO leasing and vehicle restrictions) should be established to protect the cultural resources and other values. In addition, ONA and ACEC designations should be made on all of these areas.

A major concern is the threat of vandalism to cultural resources. Much can be done by restricting vehicle access in areas that contain cultural resources, refusing to permit chainings or vegetation projects that destroy cultural sites and not allowing surface distrubing mineral activities to take place through segregation, withdrawal and NSO leasing stipulations or no-lease provisions. This must be done because alternative E projects damage to 15,678 sites (page 4-68)!

Of great concern are the potential vegetation projects (chainings) shown on page 2-47. The majority of them (Cedar Mesa, terrain surrounding Natural Bridges, Alkali Ridge and areas adjacent to Hovenweep) are in great conflict with cultural resources. Potential land treatements should not be proposed for areas with important cultural resources. This is not the only serious conflict facing cultural resource. Oil and gas interests coincide with critical cultural resources in the Alkali Ridge Area/Montezuma Creek Area (compare pages 3-11 and 3-61). These areas need protection through strict leasing stipulations.

Conclusion

The SRMAs, as identified in alternative D, are good positive steps in recreation management. The plan for mangement of the San Juan River is highly commendable for this popular resource. If the suggestions we have offered and the positive points of alternatives C and D are incorporated into the preferred alterantive, the recreation managment in this resource area will be a model for others to follow.

As we have indicated much in the plan is commendable. However, it seems that there is little consistency between resources. It is true many resources are separated by geography (For example, oil and gas interests are located east of Comb Ridge and recreation and wildlife concerns are found mainly west of Comb Ridge), and this is a good argument for incorporating many of the positive points of alternatives C and D into alternative E without any impact. However, the plan tries to be too much for everyone. As page 2-15 notes, (alt. E)

> "The goal of alternative E is to manage public lands for multiple use of public resources, as long as grazing use is maintained at existing levels, certain primitive recreation opportunities are protected,

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[Comment page 9]

By definition, the RMP cannot plan for vandalism or other illegal uses of public resources (draft page 1-10). BLM recognizes the problem but sees it as an administrative concern (draft page I-5, table I-2 and figure I-3). The potential for mitigation of adverse impacts to specific cultural sites would be considered as part of ongoing management (draft page 2-6) and under the NEPA documentation prepared as part of specific proposals (draft pages 2-1, A-1 and A-29). Many areas of relatively pristine cultural resources would be protected from surface disturbance under the special conditions developed to protect P and SPNM ROS classes (draft appendix A).

The special conditions developed for the additional proposed ACECs to protect cultural values under alternative E are projected to reduce damage to cultural sites by an additional 678 sites (see revisions to draft table 2-10 and chapter 4). The EIS makes no attempt to project the size or significance of sites that may be damaged (draft appendix Y).

Conclusion

BLM appreciates this support of the SRMAs. The SRMAs under the preferred alternative are essentially identical to the SRMAs shown for alternative D (draft figures 2-10 and 2-11). Management of the Cedar Mesa SRMA has been revised considerably because of the management prescriptions developed for the proposed Cedar Mesa ACEC; other minor changes have been made to combine several smaller SRMAs (see revsions to draft table 2-3).

BLM has tried to bring consistency to the management of various resources in SJRA by applying certain levels of management conditions across the board. These are shown in figures S-1 to S-4. By contrast, current allocations vary so greatly among management programs that they cannot be mapped in summary fashion (see draft chapter 3). BLM is confident that the proposed RMP takes into account, and resolves, the conflicts discussed in this comment.

November 2
page 10

> certain wildlife habitats are protected, and mineral uses are otherwise allowed to increase."

Conflicts between cultural resources and oil and gas (the Alkali Ridge area and Indian Creek), the admitted conflict between livestock and bighorn sheep and concerns about recreation cannot be ignored by failing to make the "hard" recommendations and allocation decisions.

We do appreciate the opportunity to comment. Thanks very much.

Cordially,

Dick Carter
Coordinator

Gary MacFarlane
Conservation Director

RESPONSE TO COMMENT 13 — UTAH WILDERNESS ASSOCIATION

[Comment page 10]

BLM is confident that the planning decisions proposed in the final EIS provide a reasoned balance among conflicting land uses.

Change to the EIS? Yes.

COMMENT 14

WASATCH MOUNTAIN CLUB
169 West 500 North, Salt Lake City, Utah 84103

The Wasatch Mountain Club (WMC) is a recreation club of approximately 1000 individuals or families primarily living in the State of Utah. Our membership includes both long-term State residents and others who have been attracted to Utah by the State's unique recreation, education, and employment opportunities. Club members engage in a variety of recreation activities, to include hiking, camping, boating, skiing, cycling, and mountaineering. Club members make frequent use of the San Juan Resource Area in persuit of these activities. Some Club members are writers, artists, students, scientists, or recreation specialists who use these lands directly in their work. All Club members will be affected by land use decisions. The WMC Governing Board submits this document to the BLM as an official WMC comment on the draft San Juan Resource Area Management Plan.

WMC Management Plan comments are guided by the following principles:

1. BLM lands should be managed to achieve sustainable NON-DESTRUCTIVE multiple use.

2. BLM lands should be managed to benefit the public at large and not solely for commercial users. Exclusionary uses that destroy habitat, degrade recreation, or cause unacceptable contamination of water and air must be avoided.

3. Viable communities of indigenous wild plant and animal species in sensitive areas existing on BLM lands must be maintained. Human uses must be regulated to protect these communities.

4. The cultural resources and antiquities existing on BLM lands must be effectively protected from further pillaging, vandalism, and inadvertent destruction.

5. The limited existing high quality water resources on BLM lands must be managed to maximum public benefit.

Guided by the above principles the WMC Governing Board believes that some use restrictions are needed for certain BLM lands . The Board has specified these areas below, following a discussion of the basis for our major concerns.

RESPONSE TO COMMENT 14 WASATCH MOUNTAIN CLUB

[Comment page 1]

BLM management is guided by a number of legal mandates. The requirements of FLPMA that pertain to land-use planning are given on draft page 1-9.

The WMC is concerned about the accelerated rate of soil destruction, and the attendant erosion and decline in water quality, on BLM rangeland. Forty to sixty percent of the soils on Utah's rangelands are covered by a mixture of lichens, algae, mosses, and fungi known collectively as cryptogams. Cryptogams form a rough, crusty textured mat that stabilizes the soil in open areas between shrubs. Cryptogamic soil crusts anchor the soil and protect it from erosion by slowing and absorbing runoff. Cryptogams also fix nitrogen that is eventually made available to vascular plants, and provide a microtopography where seeds and moisture collect. These become germination sites for vascular seeds. Cryptogams are unable to perform these vital functions when crushed or trampled.

Utah's first ranchers saw abundant grasses growing out of this cryptogamic soil base and assumed that sheep and cattle could be simply turned out to graze on these rangelands. Eventually, the fragile cryptogams, trampled by countless hoofs, no longer provided a cradle of soil for the grasses, and much of Utah's rangeland became unproductive. Off-road vehicles (ORVs) have recently entered the scene, accelerating destruction by crushing cryptogamic soils. One ORV travelling at 10 miles per hour can crush 2 1/2 acres of soil per hour. Recovery from this damage requires many years.

Because of the recent acceleration in soil destruction, due principally to increased popularity of ORVs, the BLM must limit access to its rangelands. The WMC recommends that ORV use on all sensitive BLM rangelands be restricted to established roads and trails. Hikers and mountain bicycles should also be restricted to trails through fragile cryptogamic soils. Herd size limitations and herd rotation are also recommended to allow recovery on impacted rangelands. In BLM WSAs, the needs of indigenous wild species must be given prime consideration, with appropriate domestic herd size reduction and access limitations (including recreational access) commensurate with the carrying capacity of the land. Herd limitations would also help control Giardia infestation of surface water.

[Comment page 2]

BLM is aware of the importance of cryptogamic soil crusts (draft page 3-28). In SJRA cryptogamic communities occur virtually everywhere, but are developed to the greatest degree on highly gypsiferous soils and on some shallow soils. Gypsiferous soils are among the sensitive soils to which special protective conditions were applied in the preferred alternative (draft page 3-28 and appendix A). Areas excluded from grazing use or surface disturbance are shown as having reduced soils loss; this would be largely due to the further development of cryptogamic communities already present in these areas.

The proposed RMP would limit ORV use over about two-thirds of SJRA (draft table 2-8, as revised), which would in turn help to protect soils. Current use patterns indicate that most hiking takes place in dry wash bottoms, and most mountain bicycling takes place on existing roads and trails. Recreational use will be monitored over time (draft appendix B), and provisions to restrict hiking or bicycling use in certain areas would be applied if necessary to protect other resources.

Livestock reductions may or may not be necessary to allow recovery of rangelands. This would be determined by monitoring. Initial livestock adjustments would be made during the monitoring period following completion of the RMP (draft pages 2-6, A-30, and appendix J). The preferred alternative provides for various grazing management options, such as herd rotation, for most allotments in SJRA, under AMPs (draft appendix U). Herd rotation would provide rest periods to allow recovery of soils and vegetation.

Associated with rangeland destruction is erosion and increasing amounts of dissolved solids in Utah's rivers. A recently published report on the Colorado River by the Conservation Foundation and John Muir Institute for Environmental Studies discusses options to hold down Colorado River salinity and the consequences of ignoring the problem. The current standard for water at the Imperial Dam is 879 parts per million of dissolved solids, nearly twice the amount recommended by the EPA for drinking water. By 1993 the Bureau of Reclamation predicts that this standard will be violated. By 2010 the Bureau estimates losses of $267 million per year due to salinity.

The Colorado River sevrves more than 20 million people in 7 western states and Mexico. The San Juan Resource Area lies entirely within the Colorado River drainage. Agricultural use accounts for more than three-quarters of Utah's Colorado River water allocation. The options facing Colorado River water users are (1) to accept higher salinity levels and the attendant damage, (2) invest nearly 1 BILLION dollars in salinity control projects, (3) impose water use limitations to control salinity. Building more dams is not a solution to this problem. Dam construction is followed by rapid silting, sidewall deterioration, and increased evaporation in the Colorado River drainages, all of which have unfavorable impacts on water quality. Appropriate alternatives include cessation of irrigation in areas of high-saline pickup, improving irrigation efficiency, limiting the scale of water-dependent development, restricting reservoir evaporation, and limiting grazing on public land in July and August. The incremental cost of improved BLM range management is minor in comparison to the billion dollar salinity control alternative or salinity damage costs.

Given the above options, it is clear that development in the San Juan Resource area is severely limited by water use constraints. Retaining qualified regions of the Colorado River Basin as wilderness and improved management of remaining range lands would help stabilize soils and reduce Colorado River salinity, relieving taxpayers of billion-dollar desalinization projects or unacceptable damage to vital croplands.

RESPONSE TO COMMENT 14 WASATCH MOUNTAIN CLUB

[Comment page 3]

The draft provided an extensive analysis of the estimated effects of various management scenarios on the sediment and salt yields to the Colorado River system (see, for example, draft pages 4-12, 4-19, and 4-20). Retaining parts of the watershed of the Colorado River as wilderness was not assessed, because the draft deferred discussion of the impacts resulting from wilderness designation to the statewide wilderness EIS (draft page 1-2).

The preferred alternative is expected to result in a net benefit to the water quality of the Colorado River system, in that salt and sediment yields from SJRA would be reduced. The major benefit in this regard would result from livestock management (see impact discussion, draft chapter 4). The special conditions that would be applied to development on sensitive soils and sensitive slopes are also expected to mitigate potential soils loss (draft appendix A).

Erosion and increased river salinity is only one consequence of inappropriate land use policies. Destruction of wildlife habitat is another. Many biologists believe that this planet is poised for a mass extinction of species due to disruption of habitat through human intrusion. There is considerable concern about the consequences of this reduction in biological diversity as a threat to life on this planet. Utah's unique basin-and-range physiography hosts relict plant and animal communities found nowhere else. These small, isolated communities are very sensitive to disturbance. The San Juan Resource Area riparian zones are small and attractive to recreation users. Recreation use must be managed to minimize adverse effects on sensitive plant and animal communities.

The San Juan Resource Area contains a rich treasure of Native American cultural resources, including habitation sites and rock art. Visiting cultural resource sites is a major motivation for WMC trips into the San Juan Resource Area. This cultural heritage must be protected for scientific study and the enjoyment of future generations. Unfortunately, current BLM regulation and enforcement have failed to curtail the epidemic of looting and destruction of these resources.

There is a strong relationship between ease of vehicular access in undesignated/unprotected BLM areas and cultural resource vandalism. Rock art panels have been shot in senseless acts of wanton destruction. Other vandals, determined to leave their marks on the world, have written over some of this priceless Native American art. Still others have apparently taken a fancy to the art and removed slabs. Looting and destruction has also occurred at burial and habitation sites. Many sites in the Grand Gulch region, accessible by ORVs or motorized trail bikes, have been potted. Rare Basketmaker antiquities, unique to the area, have been stolen from BLM lands and sold on the black market. The major deficiency of the draft San Juan Resource Area Management Plan is its lack of focus on this resource management problem.

The BLM has also inadvertently contributed to cultural site destruction by carelessly chaining ruins while chaining juniper trees south of Highway 95 near Cedar Mesa. No chaining sould be done without a thorough site evaluation. Chaining should not be permitted on cultural sites or in juniper stands that pre-date historical development.

RESPONSE TO COMMENT 14 WASATCH MOUNTAIN CLUB

[Comment page 4]

The draft makes provisions to protect wildlife habitat and riparian areas (draft chapters 2 and 4, and appendix A).

BLM is aware of the relationship between access and cultural resource vandalism.

It is true that in the past, prehistoric sites have been destroyed due to pinyon-juniper chainings. No new chainings have occurred on public lands within the SJRA since 1972 (draft page 3-58). The chaining referenced in this comment may not have been on public land. Under current policy, a cultural inventory would be conducted prior to any surface disturbance for vegetation manipulation (draft page A-5). There is no BLM policy to protect woodland stands that predate historical development; the age of a stand would not preclude land treatment.

It is obvious that current regulations and enforcement are insufficient to prevent the continued destruction of our Native American heritage. WMC members who have monitored cultural sites note a direct relationship between site accessability by road and the degree of damage. One obvious solution is to limit damage by limiting access. Reasonable access to a majority of the sites is possible only through non-motorized travel. The WMC recommends no uncontrolled ORV access to National Register and potential National Register cultural resource properties. Motorized access to some sites could be achieved through construction of well-defined vehicular ways. Some carefully regulated back-country travel could be allowed through a permit system. A useful addition the this Management Plan would be a set of criteria for such motorized site access.

Although WMC members have strong interests in conservation for habitat and cultural resource protection, the Club is primarily a recreation organization and its major interest is in the preservation of high quality recreation opportunities. Utah is no longer a collection of small, self-sufficient, isolated communities. The majority of the population is concentrated in urban areas, and this is where the WMC derives most of its membership. Many Club members are in high stress professional occupations, and are interested in the beneficial stress reduction achieved through recreation in undisturbed natural areas. The psychological and physical health benefits of such activities are well known. Therefore, access to "primitive" or "undeveloped" recreation is very important to WMC members.

The San Juan Resource Area is a region frequently visited by WMC members on hiking/backpacking trips. The WMC alone sponsors at least five trips each year, with Grand Gulch, Fish/Owl Creek, Mule Canyon, and Cheesebox Canyon as popular destinations. Club members enjoy hiking the narrow canyons, viewing rock art, and exploring archaeological sites. With the increasing popularity of well known areas, such as Grand Gulch, Club trips move further afield. As use of the Grand Gulch increases, the BLM may need to establish a registration-reservation system to limit visitors. Exploration of surrounding sites will then increase. Consequently, we encourage preservation of the primitive and semiprimitive non-motorized recreation areas in the central portion of the San Juan Resource Area.

[Comment page 5]

The draft includes criteria for establishing ORV designations (draft appendix E) and explains where these designations would be applied to protect other resource values (draft table 2-8 and appendix A). The approach taken in the draft was to apply the least-limiting level of restriction neccessary to resolve resource conflicts. In areas with documented resource conflicts, ORV use would be limited unless closing the area to ORV use was the only possible way to resolve the conflict.

Visitor use would be regulated through registration, reservations, or access restrictions at the activity planning level, not through the RMP (see draft appendix B, page A-29). The proposed RMP recognizes the scenic and other values that lead to recreational use near Grand Gulch through the proposed Cedar Mesa ACEC (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). The Cedar Mesa area is proposed for ACEC designation because of supporting information provided in other comments.

The WMC also recognizes the need for developed recreation sites. Established campgrounds are frequently full, indicating the need to expand this type of recreation facility. At present, an inordinate share of public recreation funds go into the Lake Powell area at the expense of development in the surrounding communities. The WMC supports a re-allocation of funds to suport motorized recreation site developments near towns as an equitable way to stimulate the local economy. However, motorized recreation site development must be bounded by the primary need to protect cultural resources, soils, and water resources.

In summary, the WMC is not opposed to development in the San Juan Resource Area, but requests that development plans be tempered by the need for cultural resource protection and mitigation of water salinity impacts. ORV use restrictions figure prominently in reducing adverse soil, water, and cultural resource impacts. We find the draft document generally deficient in cultural resource management and suggest a re-write to correct this deficiency.

The Wasatch Mountain Club wishes to thank the BLM for the opportunity to comment on the draft San Juan Resource Area Management Plan. We hope that our suggestions will lead to improved management alternatives.

Christopher A. Biltoft
Christopher A. Biltoft
Conservation Co-Director

Mary C. G. Fleming
Mary C. G. Fleming
Conservation Co-Director

RESPONSE TO COMMENT 14 — WASATCH MOUNTAIN CLUB

[Comment page 6]

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in the SJRA; this comment offers no specific information to the contrary. As a result of public comment, the discussion on the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

Change to the EIS? No.

COMMENT 15

Amoco Production Company
Denver Region
1670 Broadway
P.O. Box 800
Denver, Colorado 80201
303-830-4040

September 3, 1986

Mr. Ed Scherick
Area Manager
San Juan Resource Area
Bureau of Land Management
P. O. Box 7
Monticello, UT 84535

File: NWA-549-031

San Juan Resource Management Plan/
Draft Environmental Impact Statement

Amoco Production Company, a subsidiary of Amoco Corporation, is very active in oil and gas exploration and production in the western U.S. We appreciate the opportunity to provide comments on the San Juan Resource Management Plan Environmental Impact Statement.

It is very encouraging to see the level of analysis and documentation given to energy and mineral resources. We compliment you and your staff on this effort. However, there are several areas of concern regarding BLM management decisions and data gathering which could affect mineral resources through implementation of this plan.

One concern was the placement of primitive recreational lands in leasing category 2. This categorization is too restrictive. Eliminating surface use to these areas is not justified when there is evidence that oil and gas operations can be conducted in a manner that will not cause serious impacts on recreational use. Instead of eliminating these areas, consideration should be given to reviewing the proposal of an operator on an individual basis relative to impacts on recreational use. Mitigating measures could then be evaluated to determine whether the operation can be conducted in a manner compatible with preserving recreational values. This policy should be particularly implemented in areas of high potential for oil and gas. Therefore, we are requesting that flexibility be incorporated into the plan allowing for oil and gas activities in these recreational areas.

RESPONSE TO COMMENT 15 AMOCO PRODUCTION COMPANY

[Comment page 1]

BLM understands the concern regarding placement of public lands in a no-surface-occupancy category for minerals leasing. However, BLM believes that surface use of a lease would be incompatible with the P ROS class. (See response to comment 5, from Rocky Mountain Oil and Gas Association, on this topic.)

BLM is obligated to place public lands in the least restrictive category for oil and gas leasing (76 IBLA 395 (1983)). Closure to lease is reserved for areas where less stringent measures, such as leasing with no surface occupancy, would not adequately protect other resources (BLM Manual Section 1624.21). Under this guidance, BLM did reclassify some areas from category 4, closed to leasing, to category 3, leasing with no surface occupancy.

This comment questions the analysis of changes to wildlife populations. BLM recognizes that all numbers associated with impact analysis are projected estimates (see draft pages 2-50 and 4-2). The draft attempts to gauge the effects that would be caused by the different management alternatives assessed; therefore, things such as predation, illegal harvest, weather patterns, and disease cannot be factored into the analysis (see draft pages 1-10 and 4-2). However, some changes to wildlife impact numbers and analysis assumptions in the draft have been made (see response to comment 5 from Rocky Mountain Oil and Gas Association, on this topic).

Change to the EIS? No.

It was noted that "no-lease" areas are being eliminated. We support this proposal. However, it appears that much of these lands are being placed in category two leasing resulting in no surface occupancy. This will not prove advantageous for the oil and gas industry and will only discourage exploration. Access for those areas with high potential for oil and gas must be assured. If not, the mineral potential and economic gain from these resources will probably never be realized.

Another area of impact presented in the RMP deals with numbers associated with the loss of big game wildlife due to development activities. We have serious reservations about the numbers presented. The figures included in the document state a total loss of 497 deer due to the disturbance of critical habitat. To be able to determine population impacts is a complex and difficult task. This is mainly due to a number of factors which could affect any quantitative figures presented. Examples of these factors would be illegal and legal harvesting, weather patterns, sex and age of the animals and availability and distribution of habitat. Therefore, any prediction on population size (especially to the year 2000) is a complex determination with likely inaccuracies. As a result, we recommend that the wildlife impact analysis on populations be qualified to recognize the difficulty in assessing such numbers and that the figures be represented as estimates only.

In conclusion, we endorse alternative B of the draft resource management plan because it allows maximum potential for realizing the oil and gas resources of the San Juan Resource Area. Since the San Juan Resources Area has oil and gas potential, any alternative to encourage exploration and development of these resources should be implemented.

Thank you for considering our comments to the draft Environmental Impact Statement.

Dave Brown

D. R. Brown
Regional Administrative Compliance Coordinator

DRB/kew

LTR197

COMMENT 16

CELSIUS ENERGY COMPANY

79 SOUTH STATE STREET • P. O. BOX 11070 • SALT LAKE CITY, UTAH 84147 • PHONE (801) 530-2651

ROBERT H. "BOB" LOVELL
SENIOR ATTORNEY

September 3, 1986

Mr. Ed Scherick
Area Manager
San Juan Resource Area
Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

Dear Mr. Scherick:

Re: Resource Management Plan

Celsius Energy Company ("Celsius") is an oil and gas exploration company headquartered in Salt Lake City, Utah. From its headquarters Celsius explores the intermountain states for oil and gas deposits by, among others, drilling test wells. Celsius is, therefore, vitally interested in any activities of the Bureau of Land Management ("Bureau") which will restrict the availability of lands for oil and gas development.

Celsius has reviewed the proposed resource management plan and draft environmental impact statement regarding the planning process for the San Juan Resource area of Utah and appreciates this opportunity to present its comments. The majority of the lands affected are in San Juan County, Utah where Celsius conducts much of its activity in the Bug and Ucolo fields.

Alternative B presents a better balance of uses and appears the preferred alternative to E. Celsius believes that the placement of primitive recreation lands in leasing Category 2 pursuant to Alternative E is not in the public's best interest. Oil and gas development can be accomplished with a minimum of interference with recreational activities. Stipulations controlling surface use are a mechanism for minimizing impacts. Foreclosure of oil and gas activities by denying surface use will effectively withdraw those lands from contribution to the federal treasury. Celsius therefore urges the Bureau to reconsider completely restricting surface use on primitive recreation lands. Performance standards are a preferable alternative to absolute prohibition.

It follows that a "no lease" scenario for any area is a mistake. Oil and gas revenues are important not only to the state but to the continuing viability of worthwhile federal programs.

RESPONSE TO COMMENT 16 CELSIUS ENERGY COMPANY

[Comment page 1]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

BLM understands the concern regarding placement of public lands in a no-surface-occupancy category for minerals leasing. However, BLM believes that surface use of a lease would be incompatible with the P ROS class. (See response to comment 5 from Rocky Mountain Oil and Gas Association on this topic.) Closure to lease is considered to be an acceptable land management practice at times (BLM Manual Section 1624.21); the economic effects of closing areas to oil and gas leasing were assessed under alternative D (draft page 4-58).

Change to the EIS? No.

According to the Bureau much of the San Juan resource area has an unknown potential for oil and gas. It is better for the Bureau to adopt a flexible approach as in Alternative B to allow that potential to be quantified than to forever foreclose such knowledge by adopting the more restrictive Alternative E.

Very truly yours,

Robert H. Lovell

pw

cc: Alice Frell Benitez

COMMENT 17

Colorado Outward Bound School

945 Pennsylvania Street • Denver, Colorado 80203-3198
303-837-0880

Established 1961

November 3, 1986

Bureau of Land Management
San Juan Resource Area
Box 7
Monticello, UT 84535

Dear Sirs:

I am writing you on behalf of the Colorado Outward Bound School (COBS) with comments on the draft San Juan Resource Management Plan (SSRMP). COBS runs experiential education courses throughout much of the year in all of the major locales of the San Juan Resource Area. In 1986 over 400 students hiked, rafted, and climbed in the mountains, rivers, and canyons of Southeast Utah. In the process COBS and these students contributed to the tourism industry and hence the local economies. It is of utmost importance to us and our past and future students that the SSRMP protect Southeast Utah's outstanding cultural, scenic, recreational, and wilderness values.

My major points are:

1) I urge you to place a high priority on the protection of wilderness scenic and recreational values in the SJRA, especially in primitive, semi-primitive non-motorized and semi-primitive motorized areas.

2) Lands adjacent to National Park units should be managed in ways that will fully protect park values.

3) A strong program to protect the SJRA's archeological resources needs to be established. A cultural resource plan if developed as part of the SJRMP would highlight to Congress the need for more funding for this critical and threatened resource. Please expand the SJRMP's strategies for protecting this unique resource. We on our courses have seen numerous damaged sites; it is obvious without stronger management we will lose much of this priceless archeological heritage.

More specifically, I urge the SJRMP to:

1) Designate the following areas as Areas of Critical Environmental Concern (ACECS) and/or Outstanding Natural Areas (ONAS):

   a) Canyonlands Basin
      - We support an ACEC to protect scenic values for all lands which are visible from Canyonlands National Park or the BLM's Needles and Canyonlands Overlooks.
      - Also we support an ACEC to protect cultural values in the Canyonlands Basin.
      - All these lands should be designated an ONA.

Colorado Outward Bound School is a non-profit, tax-exempt educational organization

RESPONSE TO COMMENT 17 — COLORADO OUTWARD BOUND SCHOOL

[Comment page 1]

BLM agrees that the RMP should recognize cultural, scenic, and recreational values.

In response to comments regarding wilderness designation and protection of wilderness values, see the response to comment 13 from the Utah Wilderness Association.

Congress did not direct that public lands adjacent to NPS units be managed to protect park values. Regarding protection of lands adjacent to NPS units, see the response to comment 2 from the National Parks and Conservation Association.

The draft (page 2-6 and table 2-7) provides for the development of CRMPs. See the response to comment 35, University of Arizona, Arizona State Museum, for a fuller discussion of this topic.

BLM accepts the nominations for ACEC designation presented here (see revised appendix H). The proposed RMP proposes ACEC designation for several areas mentioned in this comment. See the response to comment 2 from National Parks and Conservation Association for a discussion of all areas suggested in this comment (see also revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). The BLM has dropped the ONA designation in favor of the ACEC designation.

b) Beef Basin
- We support an ACEC for scenic values for lands south of Canyonlands National Park.
- An ACEC is needed for cultural values for all lands between Canyonlands National Park and Dark Canyon.

c) Natural Bridges
- An ACEC is needed for scenic values. Boundary should include Harmony Flat and the lands between the monument and the National Forest.

d) Novenweep
- Establish an ACEC to protect cultural and scenic values.
- Alternative D should be adopted.

e) Glen Canyon N.R.A.
- We support an ACEC to protect cultural, scenic, and natural values for all SJRA lands that lie within Glen Canyon National Recreation Area.

f) Cedar Mesa
- An ACEC is necessary to protect cultural, scenic and natural values. An ACEC boundary consistent with the archeological district proposed under alternatives C and D is most appropriate.
- Also we support an ONA for all roadless lands in the Cedar Mesa ACEC.

g) Alkali Ridge
- We support an ACEC with the boundary proposed under Alternative D.

h) While Canyon Complex
- We support an ACEC that would protect cultural and scenic values for the area north of Highway 95 and south of the Dark Canyon Plateau and the Manti La Sal National Forest. This area includes Cheese Box, Gravel, Long, Fortknocker Canyons and landmarks like Jacob's Chair.
- We also recommend an ONA for this area.

i) Moki-Red Canyon Complex
- An ACEC is needed to protect natural, wildlife and cultural values. The boundary should include the upper ends of Red, Cedar Lake, Forgotten, and Moki Canyons plus North Gulch.
- Eventual recreational use overflow from more popular areas e.g., Dark Canyon, Grand Gulch could be directed toward this complex.

j) Dark Canyon and Middle Point
- We recommend an ACEC to preserve scenic, natural, and cultural values. Middle Point should be included.
- An ONA is alo needed for the entire area.

RESPONSE TO COMMENT 17 COLORADO OUTWARD BOUND SCHOOL

[Comment page 2]

The public comment period was not intended to solicit votes for any alternative presented in the draft.

Bureau of Land Management
November 3, 1986
Page 3

Finally, I urge the Bureau of Land Management to limit the size of commercial and non-commercial groups to 10 to 12 people. Larger groups severely impact the fragile soils, plants and wildlife of this country, as well as the experience of other recreationists. Economies of scale can be easily reached with groups of this size; the impacts of larger groups far outweigh the economic benefits.

Other points we would like to make include:

ORV USE: The plan only drops 214,000 acres from ORV use. This figure should be quadrupled.

- On semi-primitive motorized areas, a plan should be developed to monitor and control vehicle and ORV use. Otherwise, the possibility exists that this use will spill over onto semi-primitive non-motorized and primitive lands.
- In the plan all roads and trails should be described as designated as opposed to existing. Further, all designated roads and trails should be marked both in the plan and on the ground to provide a structure for management of the areas and for the edification of the general public. This will cost a little more but will allow better long-term management.

RECREATION OPPORTUNITY SPECTRUM CLASSES (ROS's): These in general need to to be more detailed and meaty. The concept is a good one, but in order to provide real management utility, the specific classes must have more substance.

Thanks for considering our input. Please keep us apprised of further developments.

Sincerely,

Mark Udall
Executive Director

MU:ag

RESPONSE TO COMMENT 17 — COLORADO OUTWARD BOUND SCHOOL

[Comment page 3]

Limits on recreational use needed to meet the objectives of recreation management will be addressed at the activity-plan level, not in the RMP (draft pages A-29 and A-36).

The draft applied the least restriction neccessary to resolve resource conflicts. Accordingly, lands would be designated as closed or limited to ORV use only where this was the only way to resolve the conflict.

ORV designations will be implemented in accordance with BLM 8341 and 8342 manual guidance (draft appendix E) and monitored in accordance with draft appendix B. The limitation to designated roads and trails is considered more restrictive than the limitation to existing roads and trails, and would be applied only in those situations where this level of management is warranted.

The ROS system is a bureauwide inventory system and classification tool (draft page 3-66 and appendix F) described in BLM manual 8320. It was not developed by this EIS team. ROS classes are developed from a specific set of inventory criteria and cannot be enlarged unless inventory conditions change.

Change to the EIS? Yes.

COMMENT 18

Southern Rocky Mountain District
Exploration United States

Marathon Oil Company

P.O. Box 120
Casper, Wyoming 82602
Telephone 307/235-2511

August 25, 1986

Mr. Ed Scherick
Manager, San Juan Resource Area
P. O. Box 7
Monticello, UT 84535

Attn: R. M. P.

Dear Sir:

Re: Comments on Draft Resource Management Plan

The Plan does a commendable job of addressing mineral resources. There is a problem, however, with minerals being considered a management concern and not a planning issue. This very positioning of minerals automatically subordinates minerals to other resources instead of considering them on an equal basis.

Since the document represents a long-range, planning tool, we feel that the wilderness question on BLM administered lands will be settled by the year 2000, hopefully. In light of specific designation of BLM wilderness areas, it is felt that Category 2 leasing should not be utilized for primitive recreation areas, especially when oil and gas potential exists. As exhibited on Figure 3-2, even areas deemed low to moderate have KGS locations within them.

In regard to the affected environment, Chapter (3), there are concerns with the stated impacts from oil, gas, and geophysical activities.

On Page 3-28, "compressor engines for oil well reinjection systems and natural gas pipelines." are considered major polluting sources. Is this based on a cumulative emissions analysis or on a site by site analysis?

RESPONSE TO COMMENT 18 MARATHON OIL COMPANY

[Comment page 1]

BLM does not agree that treatment of minerals as a management concern instead of a planning issue relegates the subject to a subordinate position (see revisions to draft page 1-6 for a discussion of planning issues as related to management of cultural resources).

The RMP decisions, including designation of oil and gas leasing categories, are to be applied regardless of eventual wilderness designation (see draft page 2-9). BLM has determined a need for the no-surface-occupancy category based on conflicts with other surface resources, and does not agree that application of no-surface-occupancy stipulations to oil and gas leases should be deferred until after wilderness designation. Existing leases would not be affected by RMP leasing category decisions (draft page 1-2).

Page 3-28. The determination of a major polluting source is made by the Utah Bureau of Air Quality based on a site-specific analysis. The amount of emissions from compressor engines depends on the size of the injection well operation; consequently, not all compressor engines would necessarily be major pollution emitters. The Bureau of Air Quality maintains monitoring data showing that some operations and pipelines are major polluting sources.

Mr. Ed Scherick
August 25, 1986
Page 2

What historic basis does the Utah Division of Wildlife Resources (UDWR) use for the prior stable numbers for herds in the resource area? There is no management level objective for the number of deer on Page 3-49.

Concerning the Environmental consequences, Chapter (4), certain questions arise.

On Page 4-15, it is stated that seasonal stipulations would not adequately protect deer habitat. Why have stipulations if they do not provide flexibility and protect the intended species and area?

It is questionable how geophysical activities, which are temporary in nature, could remove habitat and directly result in mortality. These two previous concerns also arise under alternative B, Page 4-26.

Besides mitigation through lease and activity stipulations, operating practices should be considered as being compatible with wildlife.

In conclusion, alternative B, as presented, is our recommendation. If alternative E were made more flexible and incorporated minerals as a planning issue, it would demonstrate the trade-off among resources and could possibly be supported.

Thank you for the opportunity to comment on this document.

Sincerely,

Bradley G. Penn

Bradley G. Penn
Land/Environmental Coordinator

BGP:mg

cc: R. H. Sims, Jr.
M. E. Petersen
R. C. Nelson
D. E. Brooks
J. D. Polisini

RESPONSE TO COMMENT 18 MARATHON OIL COMPANY

[Comment page 2]

Page 3-49. The UDWR caculated prior stable numbers for each herd unit using their standard formulas for estimating big game populations. UDWR formulas and worksheets are on file in their office and in BLM's Moab District Office. Estimated prior stable population numbers for deer were inadvertently omitted from the draft, and have been provided (see revisions to draft page 3-49).

Page 4-15. The section referenced discusses the impact of seasonal stipulations now in effect. As stated under the impacts of alternative A (draft page 4-15), the existing stipulation is believed inadequate because it is applied to an area different from the current crucial habitat area (compare figures 3-1 and 3-12), and the seasonal protection extends only to March 31 (draft page 3-49). For these reasons, the seasonal stipulation under the preferred alternative was revised to cover the current crucial habitat area and to extend until April 30 (draft page A-22). The intent of revising the stipulation is, as the comment notes, to protect the intended species and area.

Page 4-26. See response to Comment 5, Rocky Mountain Oil and Gas Association, regarding the effects of geophysical operations on deer habitat. BLM is confident that the draft adequately supports the need for seasonal protection.

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Change to the EIS? Yes.

COMMENT 19

The National Outdoor
Leadership School

P.O. Box AA
Lander, Wyoming 82520
307-332-6973

Jim Ratz
Executive Director

October 23, 1986

Mr. Ed Scherick, Manager
San Juan Resource Area
Bureau of Land Management
P.O. Box 7
Monticello, Ut. 84535

Dear Mr. Scherick:

The National Outdoor Leadership School (NOLS) would like to thank the BLM and San Juan Resource Area for this opportunity to respond to the San Juan Draft Resource Management Plan. Presently NOLS is the second largest Backcountry Special Use Permittee utilizing public lands in the United States. The 2,000 plus service days employed annually on SJRA lands is an integral part of our Spring and Fall Semester Programs. As one of the three commercial permittees operating in the San Juan Extensive RMA, as well as operating in the Grand Gulch and Dark Canyon SRMA, we feel we are in a unique position to comment on the San Juan Draft RMP. We hope that our concerns will be addressed.

The primitive recreational opportunities found on SJRA lands are unique and offer exceptional wilderness solitude and isolation. The unique topography and geography of this region presents extraordinary challenges to the backcountry traveler, while the incredibly rich archeological heritage preserved here is of extreme importance to the entire nation providing insight into other cultures which occupied this area of the United States. The rugged beauty, unique wilderness character, opportunity to experience solitude, and rich history are just some of the reasons NOLS has chosen this area for it's outdoor classroom.

NOLS would like to commend the BLM for its efforts in preserving this area and recognizing the important recreational opportunities which exist here. NOLS supports the BLM's preferred alternative (alternative E) in recognizing both the present and future demand for primitive nonmotorized recreation. However, there are some areas where the BLM recommendations are weak or insufficient.

NOLS is a nonprofit educational corporation

NOLS

RESPONSE TO COMMENT 19 NATIONAL OUTDOOR LEADERSHIP SCHOOL

[Comment page 1]

BLM appreciates this support for the preferred alternative.

BLM agrees that SJRA contains appreciable natural resource values.

Loss of acreage in the P ROS class under alternative E does not correlate with the projected increase in use (draft page 4-69). The special conditions that would be applied to protect ROS classes are found in draft appendix A (pages A-24 and A-25).

The management stipulations given for ROS classes under alternative C were modified under the preferred alternative to provide for a better mix of resource uses. Under the preferred alternative, the draft states (page A-24) that "most" P- and SPNM-class areas would be protected because it was believed that the P- or SPNM-class areas near the Colorado state line would be better managed for their mineral potential than for their recreational value (compare draft figures S-2 and S-4 and the analyses in chapter 4). Under the preferred alternative, vehicles would be allowed in SPNM areas if necessary to preserve valid rights, such as access to inheld lands (see draft page A-25).

This comment does not identify which SPM-class areas are of concern. Draft figure 3-16 shows few areas that are "small"; the minimum size for an SPM-class area is 2,500 acres (see MSA page 4333-42). A P-class area would not border an SPM-class area unless separated by a cliff. Implementation of ORV use categories is explained in draft appendix E.

Regarding limitations on group size in Grand Gulch, the existing group size limits apply to private as well as commercial users.

BLM appreciates this support of the proposed ACEC designations for Grand Gulch and Dark Canyon, and for proposed use restrictions in the Beef Basin area. BLM found little justification for ONA designation of the eight areas mentioned in this comment, which were analyzed in the draft. However, in response to another comment, all of these areas except Middle Point now fall within the proposed Cedar Mesa ACEC. (See response to comment 2, National Parks and Conservation Association.)

Management of WSAs and ISAs under the different alternatives assessed in the draft (including the preferred alternative) is explained in table 2-9, beginning on page 2-77 (as revised).

Change to the EIS? No.

As outlined in alternative E the amount of acreage with ROS P and SPNM classification will be reduced by 2%. In view of the fact that there is a projected increase in demand for primitive recreation of 20 to 30% any loss of acreage in these two classes must not be allowed. Loss of acreage in these catagories will have detrimental affects on recreational use patterns in the SJRA unless handled through the implementation of Special Management Prescriptions.

The management stipulations outlined for alternative E for ROS P and SPNM classes must be made stronger by stating that "all" P and SPNM class lands will be maintained at present levels rather than "most". Since SPNM means semi primitive NON MOTORIZED, no vehicles should be allowed in SPNM class areas regardless of the number of existing roads. The Management stipulations outlined for alternative C should be incorporated in their entirety in alternative E for the management of ROS P and SPNM class lands.

The existence of small SPM class lands in close proximity to SPNM lands should be eliminated as it will be both expensive and difficult to manage these areas adequately. It is unclear how the BLM will prevent motorized vehicles from entering bordering P and SPNM classified areas.

It is critically important that Special Management Prescriptions be developed and implemented to maintain P and SPNM ROS classes in regards to visitor use. Throughout the literature it is stated that private user groups present the greatest number of intergroup conflicts and threaten to lower the ROS P

Classification. Many of these areas may change to SPNM due to numerous intergroup contacts. Nowhere, however, is it stated that commercial use threatens the maintenance of ROS settings. Current management in Grand Gulch limits commercial permittees (of which there are only four) to groups of 15 individuals. It is NOLS' contention that this practice be further investigated and not allowed to be implemented in other areas until limitations are imposed on private user groups.

NOLS supports the BLM's Proposed ACEC Designation for Grand Gulch SRMA and Dark Canyon SRMA, as well as ONA Designation for Slickhorn Canyon, John's Canyon, Fish and Owl Canyons, Road Canyon, Lime Canyon, Mule Canyon, and the Middle Point Area. NOLS also supports the BLM's efforts to limit the development of increased roads and trails in the Beef Basin Area.

Although the designation of existing WSA's and ISA's is covered in the Utah BLM Statewide Wilderness DEIS as areas to be managed as wilderness under the BLM's IMP until Congress determines their status, it is unclear how these areas will be managed if they do not receive Wilderness or ONA Designation. It is vitally important that these lands plus Butler Wash, Mancos Mesa, Gravel Canyon, Long Canyon, White Canyon, and Arch Canyon be managed to maintain important existing primitive recreational and cultural values if they are not incorporated into the Wilderness system.

In summary, NOLS supports the San Juan RMP and shares the view that the need for primitive forms of recreation are in popular demand and will increase significantly by the year 2000. NOLS feels that the San Juan Draft RMP is particularly vague in addressing management concerns of the ROS P and SPNM Classes.

This is especially true in view of the information brought forth in the MSA of 1985 where specific management concerns were identified to protect the recreational and cultural values of specific areas. As of yet no action has been taken to address these concerns.

Sincerely,

Drew Leemon

Drew Leemon
Program Planner
NOLS Wyoming

COMMENT 20

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY
37 Verano Loop, Santa Fe, New Mexico 87505 (505) 984-8120

October 24, 1986

San Juan Resource Area
Bureau of Land Management
P O. Box 7
Monticello, Ut. 84535

Gentlemen:

My comments on the San Juan Resource Management Plan Draft RMP EIS follow.

Page S-9: Why is private land shown under BLM jurisdiction?

Page S-13: Why aren't cost-benefit ratios used instead of generalizations about expenses and benefits?

Page 2-92: Why are no figures supplied for the baseline year for oil and gas production?

Page 3-7: Why is no mention made of the considerable potential for developing carbon dioxide?

Page 3-8: If the Bradford Canyon, Bug, and Mustang Fields were discovered in "1983", then why doesn't their 1983 production equal their "Cumulative Production (as of 12/83)"?

Page 3-8: If the Cave Canyon and Horsehead Point Fields were discovered in "1984", then how could they have had production in 1983?

Page 3-9: Patterson Canyon Field was not discovered in 1981. The discovery well, Mountain Fuel Supply No. 1 Patterson Canyon (9-38S-25E), was completed June 27, 1974.

Page 3-18: The implication is made that cultural and visual resources cause more problems for mineral material disposal than are caused by mining claims. What data supports this conclusion?

Page 3-28: What data supports the conclusion that "Major polluting sources ... include .... oil well reinjection systems and natural gas pipelines"? Why is there no mention of burning dumps, some of which are on BLM land, or residential fireplaces?

Page 3-33: Why is oil and gas exploration and development listed as a primary use in sensitive soil when no such development and little exploration has occurred in 3 of the areas (Comb, Red, and Lockhart), yet no mention is made of the locatable mineral activity which has taken place in all 3?

Page 3-33: Why is industry listed as a primary user of water on this page, but such use is listed as "minimal" on Page 3-36? The oil and gas industry alone requires thousands of barrels of water every day for secondary recovery operations.

Page 3-36: Why is water use listed as "incidental" in drilling operations? While the amount used is small, the expense of obtaining it and its importance as an economical and environmentally safe transport, cooling, friction reducing, and pressure control medium are great.

RESPONSE TO COMMENT 20 PERMITS WEST, INC.

[Comment page 1]

Page S-9. The small-scale maps shown in the draft (figures S-1 through S-4) are not intended to imply that BLM has jurisdiction over nonpublic lands. See also draft figure I-5 and table I-3.

Page S-13. The method and rationale for figuring budget costs are given in appendix K (as revised). Although some agencies attempt to project the relative economic efficiency of planning alternatives, BLM lacks the expertise, data, and funds to conduct this type of analysis. The comparisons (draft page A-91) represent the highest level of analysis possible, given the available resource data and funding constraints.

Page 2-92. Table 2-10 is a comparison of impacts, not a tabulation of baseline data (draft page 2-50). See table 3-3 for oil and gas production figures.

Page 3-7. If CO_2 were produced, it would be administered under the oil and gas leasing categories developed in the RMP. The CO_2 is in the Mississippian Leadville limestone (draft page 3-13), several thousand feet below the productive oil and gas horizons. If industry showed interest, more wells would be drilled to this horizon, and testing would occur. This has not happened in SJRA. BLM believes that the CO_2 in SJRA will not be tested for potential commercial value before 2000, the analysis time frame for this EIS (draft page 1-1).

Pages 3-8 and 3-9. The draft has been corrected (see revisions to table 3-3).

Page 3-18. BLM does not believe the text implies that cultural and visual resources cause more problems for mineral material disposal than mining claims, or vice versa.

Page 3-28. See response to comment 18, Marathon Oil Company, on this topic. Burning dumps were not analyzed because state regulations prohibit intentional burning of dumps, and unintentional burning cannot be predicted. Residential fireplaces do not individually emit more than 100 tons of pollutants per year, and so do not fall under state regulation (draft page 3-28). There is no regulatory requirement that residential stoves be considered collectively as one single source of emissions.

Page 3-33. The text of the draft has been revised to cover all minerals exploration (see revisions to draft page 3-33). The word "minimal" is used in relation to industrial uses with respect to the water supply as a whole and the current drain on that resource.

Page 3-36. Water use was not listed in the draft as "incidental" to drilling; the drilling operations were listed as "incidental" to minerals production.

Page 3-36: If ground water is controlled more by precipitation than by use, then what base line data is being acquired to determine if this will be the case in the future?

Page 3-36: While law limits wells to a yield of 0.015 cfs, what is being done to insure the wells are actually in compliance? Casual observation indicates considerably more than 0.015 cfs flows unmonitored from wells in Cross Canyon and along Bluff Bench.

Page 3-37: Doesn't Hovenweep's 1,400' water well, among others, tap the Navajo aquifer?

Page 3-49. Isn't the Colorado River on the west instead of "north"?

Page 3-50: The table is not clear. Are the listed conflicts history, current events, or predictions? Why are there mineral conflicts in 3 WSAs (Road, Fish, & Mule Canyons)? If the conflicts are history, then why aren't the impacted areas cherry stemmed?

Page 3-51: Why isn't White Canyon listed as a riparian area? It is shown as a "major waterway" (quote from Page 3-49) in Figure 1-4, and has riparian vegetation.

Page 3-58: Why is no mention made of forage loss or disturbance due to county roads? What data was used to arrive at the figure of 500 acres for oil and gas production facilities?

Page 3-60: How many of the impacts to cultural resources were due to oil and gas exploration and development? How many were due to pot hunting? How many were due to recreation? Have the number of sites damaged by each been tabulated?

Page 3-65: Why is no mention made of the threat to cultural resources posed by mining and county road construction in the Alkali Ridge-Montezuma Canyon area?

Page 3-81: How is the statement "... roads, oil and gas developments, and seismic activities probably have had the most significant adverse impact...." substantiated? It would seem tens of thousands of acres of chainings would have a significant adverse impact. Why has the impact from mining been omitted?

Page 3-82: How is the demand for land use permits and authorizations measured?

Page 3-91: How is it that "Most of the settlement is in the western half of the county" when the two largest towns and most of the rural population are in the eastern half?

Page 3-91: How can mining account for 19% of the wages and employment in the text, 16.5% of the jobs in Table 3-16, and 30% of the earnings in Table 3-17?

Page 3-92 & 3-93: The tables would be easier to use if they included the numbers which the per centages represent. Are oil and gas included in mining?

Page 3-93: It would be helpful if the table included the average wage in each category.

Page 3-95: Why is there no table showing federal government receipts from each activity (oil and gas royalties, rent, assessments, and bonus payments; rafters' fees; right-of-way charges; salable mineral receipts; grazing fees, etc.)?

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY

RESPONSE TO COMMENT 20 PERMITS WEST, INC.

[Comment page 2]

No baseline studies are currenly done by BLM on ground water in SJRA. The state allocates use through water rights (draft page 3-33), not ground water supplies. State law limits the flow of new wells, but wells may have water rights in excess of this flow. The state, not BLM, enforces this law.

Page 3-37. The Navajo aquifer near Hovenweep is about 500 feet below the surface; a 1,400-foot well would tap a lower aquifer.

Page 3-49. In SJRA, the Colorado River borders public land only at the north end of the resource area (draft figure 1-5).

Page 3-50. Table 3-6 shows both current and projected conflicts. Minerals activity under IMP occurred in the WSAs cited after they were established.

Page 3-51. This drainage is now included (see revisions to draft table 3-6).

Page 3-58. Since 1976 county roads have disturbed fewer than 100 acres (draft appendix W). The 500 acres from oil and gas facilities was based on estimated averages of 1.33 acres per pad and 2.42 acres per access road for each of the 87 production facilities located from 1979 through 1985 (SJRA staff estimates).

Page 3-60. The estimated number of sites damaged, and the cause, were tabulated for each alternative (draft appendix Y).

Page 3-65. Mining is not seen as a current threat in the area mentioned. Road maintenance in the area has threatened cultural resource sites (draft page A-64); impacts from new roads would be mitigated (draft page 3-65). Most road maintenance in the area has been for oil and gas exploration.

Page 3-81. The statement includes the uses believed most significant. Trees have grown in old chainings, and these areas appear natural from a distance. No new chainings have been initiated on public lands in SJRA since 1972 (draft page 3-58). Roads are the most significant visual impact from mining activities (draft page 3-81). Other disturbance from mining was not judged significant.

Page 3-82. Not all land-use authorizations can be anticipated through the RMP (draft page 3-87). The lands actions impacted are listed in table 2-10.

Page 3-91. The statements regarding population demographics and percent of mining employment were in error (see revisions to draft page 3-91). Table 3-16 shows wage and salary employment; table 3-17 shows earnings.

Pages 3-92 and 3-93. The tables illustrate the economic structure of the county; actual numbers vary annually and can be derived through multiplication. Oil and gas extraction is under the mining division in OMB's Standard Industrial Classification Manual, which economists use to list industry types. Earnings and personal income indicate economic conditions better than do wage and salary income, which comprise only about 86 percent of Utah earnings.

Page 3-95. The EIS team analyzed regional economic impacts in accordance with NEPA. No measurable effect on the local area from federal receipts was found.

Page 3-96. How is it that 40% of the oil and gas jobs are related to the SJRA, but 85% of the oil produced in the county in 1981 was produced on the Navajo Reservation?

Page 3-96: It would be informative if the table noted which year it represented, listed the average wage in each category, and summarized the columns.

Page 3-98. Has the impact from increased local alfalfa production from the irrigated lands of the Dolores Project been accounted for in the discussion of forage alternatives?

Page 4-7: A 40% success rate is assumed for oil wells. What is the historic rate in the SJRA?

Page 4-12: Grazing and minerals are noted as the leading causes of increased sediment and salinity. Proportionately, how much do each contribute to the problem? How much is contributed by roads and ORVs?

Page 4-12: How many unplugged or improperly plugged holes are due to geophysical activities? How many are due to oil and gas development? How many are due to uranium exploration?

Page 4-14: Is natural growth rate synonymous with net increase? A "... natural growth rate of 10 percent per year ...." would increase the bighorn population from 1,100 to 1,210 in just one year, and triple the population by the year 2000.

Page 4-14. If "livestock grazing ... would result in continued competition for forage and space ....", but Page 3-58 states "Cattle and desert bighorn sheep or antelope do not compete for forage, space ....", then which is true?

Page 4-15: Why is there a need for special conditions in riparian/aquatic habitat when the Corps of Engineers already administers the Sec. 404 dredge and fill permit program?

Page 4-70: What has changed that would allow BLM to develop campsites along Indian Creek, but prevented the State of Utah Div. of Parks from doing the same?

Pages 5-13 through 5-15: Didn't anyone go to college?

Page A-5: When did grazing permittee "operators" begin hiring archaeologists instead of relying on the BLM archaeologist?

Page A-6: Why aren't trash cages, in lieu of pits, allowed during drilling operations?

Pages A-95 through A-97: Why are there no tables showing the ratio of support requirement costs to gross receipts (royalties, rentals, fees, etc.) received by the federal government for the various alternatives?

Pages A-186 through A-190: Why are there no acreage figures for rights-of-way for roads?

Please send me a copy of any revised or final RMP EIS. Thank you.

Brian Wood

PERMITS WEST, INC.
PROVIDING PERMITS for the ENERGY INDUSTRY

RESPONSE TO COMMENT 20 PERMITS WEST, INC.

[Comment page 3]

Page 3-96. SJRA manages minerals on other federal lands (draft table I-4). Oil and gas production from federal minerals administered by SJRA is about 40 percent of the total from San Juan County. Table 3-19 used several sources, not all for the same years. The estimates, based on activity between 1980 and 1985, used 1983 dollars. Average wage is not thought useful, as noted above. The columns have been totalled (see revisions to draft page 3-96).

Page 3-98. The Dolores Project is not expected to affect alfalfa prices or the demand for forage. Growing alfalfa would be cost more than grazing public rangelands, regardless of any increase in local production from the project.

Page 4-7. The historic success rate is approximately 40 percent.

Page 4-12. The proportions of loss from grazing and minerals can be derived from the figures on draft page 4-12: over 90 percent is from grazing, less than 10 percent from minerals activity (primary new road construction). Soils loss from other activities is negligible and unpredictable (draft page 4-12).

Page 4-12. The statement cited is hypothetical and states that when proper procedures are used, ground water is not contaminated. Holes that were improperly plugged or unplugged have been observed, but have not been counted.

Page 4-14. The 10 percent natural increase should have been until 2000 (see revisions to draft page 4-14). The draft was inconsistent; no competition with bighorn sheep occurs (see revisions to draft page 3-58 and 4-14).

Page 4-15. Section 404 of the Clean Water Act requires permits to protect waters from some types of damage. It applies to effects on major streams from construction or channelization; it does not apply to all drainages and does not protect the vegetation and stream banks from disturbance.

Page 4-70. BLM-proposed campsites (draft figure 2-11) are in different places from those proposed by the state in their R&PP application.

Page 5-13. CEQ regulations (40 CFR 1502.17) provide requirements for the list of preparers of an EIS; educational history is not a requirement.

Page A-5. BLM continues to do cultural inventories for grazing actions (see revisions to draft page A-5).

Page A-6. Trash cages are allowed for drilling (revisions to draft page A-6).

Pages A-95 through A-97. There is no known method of projecting changes in federal receipts among alternatives. RMP guidance does not require analysis of gross receipts; the RMP cannot be used to propose alternative fee structure.

Pages A-186 through A-190. Tables AW-1 through AW-5 show 1,500 acres disturbance for rights-of-way; the acreage for roads was not separated.

Change to the EIS? Yes.

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Reply to: 730 Simms Street, Room 450
Golden, Colorado 80401

COMMENT 21

December 17, 1986

Mr. Sherwin N. Sandberg
San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

REF: Draft Resource Management Plan/Environmental Impact Statement with accompanying Management Situation Analysis for the San Juan Resource Area.

Dear Mr. Sandberg:

On June 12, 1986, the Council received for review the above-referenced documents. We apologize for the delay in responding, even with the Bureau's extension of the deadline until mid-November, but we have been operating with a temporarily reduced archeological staff. The Council commends the Bureau for preparing and presenting a complex document in a readible fashion. The RMP in particular contains extensive information, which we have had the time to skim only.

Given the high number and significance of historic properties in the San Juan Resource Area, we do not understand why the Bureau did not establish historic preservation as a management planning issue. The historic properties of the San Juan Resource Area are of national, possibly world-level, signficance. As a non-renewable resource, they demand careful conservation and management because of their great public interest and potential to afford opportunities for education and recreation. Accordingly, we believe that they should be accorded greater planning attention than is apparent in the RMP. In this document, it often appears that historic preservation has taken a "back-seat" role to other management concerns, primarily because historic preservation is not a designated management planning issue. We believe that this should be rectified.

We are concerned about the management approaches outlined in A-78 to 83. We believe that these special management prescriptions are entirely too vague to be useful or wise. We urge that these prescriptions be abandoned wholesale, in favor of more specific language or that an aggressive campaign of Cultural Resource

RESPONSE TO COMMENT 21

ADVISORY COUNCIL ON HISTORIC PRESERVATION
WESTERN DIVISION OF PROJECT REVIEW

[Comment page 1]

BLM appreciates the Council's review of the RMP/EIS.

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1); however, management of cultural resources was noted as a managment concern (draft page 1-6). Management of cultural resources under BLM's management program 4331, Natural History/Cultural Resources Management, was discussed in the draft. Management common to all alternatives was discussed on page 2-6. Management under the different alternatives assessed was discussed on pages 2-19, 2-20, 2-31 through 2-39, 2-56, 2-60, and 2-69.

As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

The pages referenced in this comment (draft pages A-78 to A-83) are from draft appendix I and refer to alternative management of special designation areas only. This section has been revised in the final EIS. The special conditions for management of cultural resources are given in appendix A. The preferred alternative provides for the preparation of CRMPs (draft table 2-2).

Management Plans (CRMP) be instituted immediately. We are pleased that under Alternative E CRMPs will be developed for the Alkali Ridge National Historic Landmark District especially and also for the Cedar Mesa, Fable Valley, and Tin Cup Mesa Historic Districts. However, we believe that all of the districts and sites in Table 2-2 are meritorious of site-specific management efforts and do not believe that the special management prescriptions in A-78 to 83 will provide such. We believe that the Alkali Ridge NHL District CRMP should be developed first and offer the following as examples of the types of approaches that we would like to see included in the CRMP. As we understand the general situation affecting the Alkali Ridge NHL District, its historic properties are being affected by energy development, land treatments, and vandalism. For example, it would appear that a management approach could be worked out in concert with the energy industry or lease holders that draws on joint-use of facilities, such as access roads, to minimize impacts to historic properties as much as possible. Similarly, perhaps a single comprehensive Research Design/Data Recovery Plan could be developed to maximize the efficiency and archeological results of the generally site-specific archeological work that absolutely needs to be done. Further, we see no clear discussion of the relative benefits from such activities as grazing in the Alkali Ridge NHL District weighed against their effects on historic properties and their attendant improvements and land treatments such as vegetation suppression necessary for grazing. We wonder why grazing in the NHL District would be considered important, if its true, cumulative effects on historic properties were considered. In this sense, we look forward to helping in the evaluation of the sample prescribed burn in the Alkali Ridge NHL District that was subject of a Section 106 review consultation earlier this year. These are examples of the type of issues the CRMP should consider.

Given the great density of significant historic properties in the San Juan Resource Area, we urge that larger areas be designated as archeological districts eligible for the National Register of Historic Places or nominated for inclusion in the National Register. Indian Creek, Beef Basin, Davis Canyon, and Lavendar Canyon would seem to be candidates for this sort of evaluation. Similarly, we believe that there is ample justification for considering a "San Juan River archeological district," possibly done in consultation with the Navajo Nation and crosscutting jurisdictional statuses. After the historic properties in larger land areas have been evaluated, we believe that the Bureau should begin evaluating or nominating to the National Register smaller individual sites, including the three individual sites deleted from Alternative E, Table 2-2, i.e., Davis Canyon Archeoastronomy Site, the Moon House Ruin, and the Shay Canyon Petroglyph.

Regarding our thoughts about a "San Juan River archeological district," we believe that BLM and the Navajo Nation also should look toward joint management of the historic properties along the

[Comment page 2]

The management prescriptions referenced in this comment are in appendix I and do not relate to the proposals in table 2-2. Management prescriptions for cultural properties and archaeologic districts listed, or eligible for listing, on the National Register under the preferred alternative are given in appendix A (draft page A-27).

As noted in this comment, the draft (table 2-2) provides for nominations of specific cultural resource properties to the National Register. However, it is inefficient for BLM to nominate individual cultural properties to the National Register. Anyone, including the commentor, can nominate cultural sites to the National Register. BLM manages sites that are potentially eligible for listing in the same way as it manages sites that are listed on the National Register (draft page 2-6).

BLM appreciates the suggestions regarding prioritizing preparation of CRMPs. The CRMPs are activity plans that would be prepared after completion of the RMP (draft page 2-19 and appendix B).

The draft shows areas that are physically suitable for land treatments, not proposed projects (draft page 2-19). No attempt has been made to predict where, within the potentially suitable acreage, the treatments would actually occur, or the methods that would be used to accomplish treatment. Land treatments would be possible over part of the Alkali Ridge NHL (compare figures 2-11 and 2-15). The NEPA document prepared for a specific land treatment project (draft pages 2-1, 2-19, A-1 and A-29) would identify mitigation for adverse impacts to other resource values, such as cultural resources. Potential mitigation measures might include using herbicides or fire to accomplish land treatments or leaving buffers (islands) around cultural sites if mechanical means were used.

BLM agrees that a wealth of cultural sites in SJRA are worthy of National Register designation (draft page 3-60). BLM will consider additional nominations to the National Register when appropriate (draft page 2-6). Given the site density in SJRA, nominating individual sites is not cost-effective for BLM; nomination of the entire resource area, while possible, would not serve to focus management on specific properties. Nomination or designation to the National Register does not, in itself, guarantee any particular level of management; therefore, the preferred alternative provides management prescriptions for these sites (draft page A-27).

San Juan River, especially as related to law enforcement and public interpretation, in view of the recent vandalism at the Kachina Panel and other archeological sites along the river. In our experience, the Navajo Nation is very concerned about these matters and may take steps to manage more effectively these areas. Likely, a joint approach would result in more effective management and lower program costs.

We suggest that the Bureau make their management of the Grand Gulch area easier by making the Grand Gulch ACEC and the archeological district coincide as much as possible. We urge that the district be enlarged to the boundaries of the ACEC. Also, we wonder how the State of Utah's recent choice of a parcel in Grand Gulch for a land transfer jives with the management goals for the archeological district, including historic properties outside the district. Will there be any attempts to consider indirect effects on historic properties remaining on Bureau lands, should the State choose to develop the parcel in the future?

Related, we are concerned about the isolated land disposals identified in Table AQ. Were historic preservation concerns including indirect effects considered in the designation of these land parcels? The Bureau should recognize that it will need to comply with Section 106 on the effects of these contemplated land disposal actions on historic properties in accordance with 36 CFR Part 800.

Finally, we found the explanations in Appendix Y very interesting.

We hope that these comments have been useful and would be happy to elaborate further on them. If you have any questions or wish to discuss this further, please contact Ms. Marjorie Ingle of this office at 303-236-2682 (commercial) or 776-2682 (FTS).

Sincerely,

Marjorie Ingle

for Robert Fink
Chief, Western Division of
Project Review

RESPONSE TO COMMENT 21

ADVISORY COUNCIL ON HISTORIC PRESERVATION
WESTERN DIVISION OF PROJECT REVIEW

[Comment page 3]

BLM agrees that the agency must work together with the Navajo Nation regarding joint management of sites along the San Juan River.

BLM has revised the preferred alternative shown in the draft to enlarge the ACEC proposal surrounding Grand Gulch (see revisions to draft chapter 2 and appendixes A, H, and I). The existing Grand Gulch Archaeologic District would be expanded to cover the Cedar Mesa Plateau (draft figure 2-11 and 3-15).

Appendix Q of the draft indicates that sale of any tract listed may be precluded for specific legal reasons, which would include historic preservation laws. The wording of appendix Q has been changed to clarify that the presence of historical, as well as archaeological, sites could preclude disposal (see revisions to draft page A-125). Wording has been added to chapter 2 under Management Guidance Common to All Alternatives to clarify consultation requirements (see revisions to draft page 2-6).

Appendix Y presents analysis methods believed appropriate for the SJRA.

Change to the EIS? Yes.

COMMENT 22

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
ONE DENVER PLACE — 999 18TH STREET — SUITE 1300
DENVER, COLORADO 80202-2413

OCT 31 1986

Ref: 8PM-EA

Ed Scherick, Area Manager
San Juan Resource Area
Bureau of Land Management
Post Office Box 7
Monticello, Utah 84535

Re: San Juan Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS)

Dear Mr. Scherick:

In accordance with the National Environmental Policy Act (NEPA) and our responsibilities under Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the referenced document. Our review was aided by several discussions with BLM staff. Our enclosed comments are intended to make a constructive contribution to the assessment of environmental effects and the development of the RMP as a "complete management plan for the entire" San Juan Resource Area (page 1-10).

We have rated the draft RMP/EIS as EO-2 (environmental objections-insufficient information). The EPA is primarily concerned with protection of water, watershed, and wetland-riparian related values, and improvements where needed of those values. In order to meet these concerns, we have recommended several corrective actions, such as the following: better description of consistency with water quality standards; stronger correlation of grazing direction to protection of rangeland resource values; expanded and more definitive objectives for wetland-riparian area restoration/improvement; additional measures to address potential Areas of Critical Environmental Concern; further development of mineral activity guidance and impact assessment; and inclusion of a more specific continuing inter-agency coordination strategy. In several instances we had difficulty determining BLM's proposed resource management guidelines and needed activity plans. A summary of our EIS rating definitions is enclosed.

We are particularly pleased with the inclusion of alternative budgets, the implementation and monitoring appendix, and the development of several environmental thresholds. EPA hopes that such information can be part of all future BLM RMP/EISs. We also commend BLM for identifying appropriate mitigation measures by alternative (Appendix A), the potential for designating watershed and water quality-related sites as Areas of Critical Environmental Concern (ACECs), and the need to address hazardous waste sites.

RESPONSE TO COMMENT 22 ENVIRONMENTAL PROTECTION AGENCY, REGION VIII

[Comment cover letter]

BLM appreciates this support for the draft alternative budgets, implementation and monitoring appendix, environmental thresholds, and other topics cited.

BLM has made the changes suggested by the Environmental Protection Agency wherever possible.

The EPA would appreciate the opportunity to review and discuss with BLM the proposed responses to EPA concerns prior to the proposed RMP and final EIS. We feel that such a coordination process would be beneficial in helping resolve our concerns. Please contact Doug Lofstedt of my staff as needed for further EPA coordination (303-293-1710 or FTS 564-1710).

Sincerely,

Robert R. DeSpain

Robert R. DeSpain, Chief
Environmental Assessment Branch

Enclosures

cc: Moab District Manager
Utah BLM State Director, Salt Lake City
Office of Planning and Environmental Coordination, BLM Washington Office
Utah Bureau of Water Pollution Control, Salt Lake City
Southeastern Utah Association of Governments, Price
Field Supervisor, Ecological Services, U.S. Fish and Wildlife Service
Salt Lake City
EPA Office of Federal Activities (A-104), Washington, D.C.

EPA DETAILED COMMENTS OF BLM DRAFT SAN JUAN RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT (RMP/EIS)

Water Quality, Watershed, Aquatic Life

We commend BLM for planning to "take appropriate actions to maintain the water quality of streams within" the San Juan Resource Area (SJRA) "to meet state and federal criteria" (page 2-8). Our comments identify ways in which we believe the RMP/EIS should be strengthened to more consistently meet this general planning objective. In addition, where the term "criteria" is used, we recommend that it be replaced by: water quality standards, including designated beneficial uses and antidegradation requirements.

The San Juan Management Situation Analysis (MSA) on page 4340-33 states that "activities that contribute to soil erosion and deterioration of water quality must nevertheless be allowed." This statement appears to directly contradict the Federal Land Policy and Management Act (FLPMA) directive to manage "use, occupancy, or development" in compliance with state and federal water quality laws and standards (Section 202(c)(8) and 302(c)). Section 313 of the Clean Water Act (CWA) and Executive Order 12088 also contain guidance for federal agency compliance with "Federal, State, interstate, and local requirements" for water quality. Consequently, management direction to provide consistency with water quality standards (WQS) needs to be addressed in more detail.

The WQS regulations require, in part, that existing uses be fully maintained and protected, and that high quality waters be maintained (except in certain cases when certain specific requirements are met). In other words, not only should water quality be improved to meet standards where necessary, but high quality waters and existing beneficial uses must also be maintained and protected. This recommendation is supported by both EPA's antidegradation policy (40 CFR Part 131.12), and the State's antidegradation policy. The BLM should evidence its intent to ensure that any potential increases in sediment, salt loading, or other pollutants that could adversely impact existing beneficial uses will be avoided.

We commend the inclusion of critical thresholds for various environmental components in Chapter 4. However, we suggest revisions of the thresholds for water quality to more directly relate to restoration/maintenance of WQS and biological integrity (page 4-4). We recommend that WQS be part of management objectives (page 2-57). It is unclear how the "1 acre-foot per square mile" sediment threshold is correlated with meeting water quality requirements or maintaining existing state designated beneficial uses. Improvements in water quality under each alternative in Chapter 4 should be related directly to protecting the beneficial uses prescribed in State WQS.

The EPA questions how BLM can adequately address protection of WQS without at least an RMP/EIS summary evaluation and location of waters that do not now meet State WQS. We recommend that Chapter 3 (pages 3-33, 36 and 37) be revised to answer the following questions: What are the WQS problems? What are the trends? What is the condition of the biological ecosystems? The Forest Service model called COWFISH could be used to help facilitate this type of assessment.

RESPONSE TO COMMENT 22 — ENVIRONMENTAL PROTECTION AGENCY, REGION VIII

[Comment page 1]

Water Quality, Watershed, and Aquatic Life

BLM appreciates this support for water-quality-related actions and has changed the text of the draft according to the suggestion regarding the term "criteria" (see revisions to draft page 2-8).

BLM is aware of the water quality standards, and agrees that management direction is needed. However, data available at this time are insufficient to address impacts to water quality standards in greater detail. The major impact to water quality from surface management of the SJRA is to levels of total dissolved or suspended solids, evaluated in draft chapters 3 and 4. The suggested revision to page 2-8 of the draft should provide management direction to maintain water quality standards.

BLM has adopted the suggested addition to the threshold for surface water quality (see revisions to draft page 4-4). Changes to these levels that may result from EIS alternative uses are difficult to estimate.

Most impacts to stream water quality from surface management actions are related to sediment yields and associated dissolved solids. For the EIS analysis, BLM estimated sediment yields and associated salt yields from alternative management actions. These parameters relate to soil productivity in the SJRA and allow for assessment of water quality from salt loadings. However, regulatory water quality standards override any restrictions under any alternative; under any alternative, water quality would be protected, regardless of other management restrictions proposed (see revisions to draft page 2-8).

A critical threshold need not relate to a specific regulatory requirement. The critical threshold for sediment involves maintaining a productive site instead of water quality; the exact relationship between the two is not pertinent to broad-scale land-use plan. Site-specific impacts, including those to soil constituents, would be assessed at a later stage (draft pages 2-1, A-1, and A-29).

BLM is not aware of waters in SJRA that do not meet state water quality standards. SJRA has four perennial streams (draft page 3-36); they have not been monitored regularly. BLM has no data on condition and trend of stream biological ecosystems (data gap identified on MSA page 4340-22). Of ten streams listed in the MSA (page 4340-11) that had designated use classes under the state water classification system, one has occasional violations that appear natural in origin. The Colorado and San Juan Rivers drain an area greater than SJRA; seven streams lie predominantly on USFS land.

BLM thanks this commentor for bringing COWFISH to our attention.

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Deteriorated watershed conditions are discussed on page 3-33 and in Appendix H. Apparently, the special conditions in Appendix A are being relied on to address the existing problems (see page A-70 for example). We feel that the RMP should prescribe a much more pro-active approach to addressing existing problems (including the role of grazing management). We recommend that the RMP clearly identify and list the specific watershed management plans, or other types of activity plans, upon which BLM will rely to address existing deteriorated conditions. We suggest a more in-depth discussion of RMP direction for addressing the "poor vegetation cover" that is contributing to salinity (page 3-37). BLM commitments as part of cooperative management for interspersed ownership of the Montezuma and Recapture Creek drainages should be defined (page 5-8). Also, we could not find that special conditions for grazing (pages A-20 and 21) have been developed for these watersheds. The "soil, water, air" budget for the preferred alternative should be consistent with the documented restoration funding needs, yet the EIS indicates (page A-96) that no growth in this budget is proposed.

We suggest that soil and water hazard areas requiring limitations on surface disturbances be included on page 2-87, and on pages 2-74 and 91 for ORV controls. Management actions for land treatments for water and watershed (page 2-72) refer to "4332" (Wilderness Management). We would like to see these management actions described more thoroughly by alternative. A surface disturbance reclamation requirement appears to be needed for the preferred alternative (Alternative E) on page 2-87. We suggest that it be added.

The RMP/EIS states that there are no municipal watersheds in the resource area (page 3-37). Yet the Management Situation Analysis (MSA) states that drainage from BLM administered lands will flow into Recapture Reservoir, which would be used by Blanding as an "emergency culinary supply" (page 4340-29). The MSA then states that "Special management of this watershed is necessary to protect water quality and ensure its suitability for culinary use." The MSA also suggests designation as a municipal watershed. We suggest RMP/EIS revisions to reflect consistency with MSA recommendations.

The resource area has 754,900 acres of soil that is "highly susceptible to water erosion when disturbed" (page 3-33). Yet the map on page 3-31 shows only 195,000 acres of "sensitive soils". Aren't all the soils that are highly erosion prone also "sensitive soils"? We suggest mapping of the 754,900 acres.

Potential ground water degradation associated with natural resource development activities should be more thoroughly discussed (along with mitigation procedures). For example, development of oil and gas could increase the number of underground injection wells. Ground water quality will decrease where operators of injection wells associated with oil production propose to inject into Underground Sources of Drinking Water (USDWs). USDWs are defined by EPA as aquifers with a total dissolved solid value of 10,000 ppm or less. Even though ground water quality is decreased when operators are allowed to inject into USDWs, exemptions to USDW protection can be issued, but only if existing and future drinking water supplies will not be affected.

RESPONSE TO COMMENT 22 ENVIRONMENTAL PROTECTION AGENCY, REGION VIII

[Comment page 2]

Page 3-33. The statement about deterioration of watershed conditions refers to several drainages that have significant downcutting. Neither the cause nor the solution is completely apparent. The lack of data regarding the extent or cause of watershed problems hampers efforts to find solutions. BLM has worked with several federal and state agencies regarding watershed management (see revisions to draft chapter 5).

Page 3-37. The statement regarding poor vegetation cover was included to indicate conditions that contribute to water pollution. Management actions to ensure sustained yield of forage bring about a corresponding increase in water quality (draft chapter 4 and appendix U). Watershed management is generally a component of AMPs, which are activity plans (draft pages 2-1 and A-29 and appendix U). Components affecting watershed conditions are assessed over time through range monitoring studies (draft page 2-6 and appendix J). An AMP would address means (such as removal of livestock grazing or implementation of grazing systems) to improve vegetation cover in sensitive watersheds or areas of poor watershed condition. Impacts cannot be estimated prior to development of the AMP.

Page 2-87. Table 2-9 does not establish management goals; rather, it lists the ways each planning issue is answered under each alternative. Reclamation requirements for surface disturbance and protection of riparian areas are presented in table 2-9, as revised. Management actions are described more thoroughly by alternative in table 2-7, as revised.

Page 2-74 and 2-91. Limitations to ORV use were applied to sensitive soils areas under draft alternatives C and D. The impact analysis did not indicate a significant decrease in soils loss due to this limitation (draft table 2-10 and chapter 4).

Page 2-72. Management actions for land treatments incorrectly referenced code 4332 instead of 4322 (see revisions to draft table 2-7). The MSA discussed the possibility of municipal watershed protection for the Recapture Dam drainage basin (MSA page 4340-28). The San Juan Water Conservancy District did not wish to discuss this further (draft page A-69).

The term "sensitive soils," defined on page 3-28 and in the glossary, does not include all soils that are highly susceptible to erosion (draft page 3-33). SJRA is covered by third-order soils surveys (mapped at a scale of 1:24,000) (MSA page PP-31); BLM believes it would be inappropriate to show all discrete areas of soils highly susceptible to erosion on the planning map scale (approximately 1:750,000).

Ground water information for the SJRA is limited (MSA page 4340-22). Specific impacts to ground water would be assessed at the project stage (draft pages 2-1, A-1, and A-29). Compliance with federal and state regulations should adequately mitigate potential degradation (see revisions to draft page 2-8).

Therefore, if ground water degradation occurs, the noticeable impacts are moot. In addition, where injection wells are drilled through USDWs, well construction must also protect USDWs by using proper cementing and casing design. A similar analysis should also be done for tar sands development, geothermal energy production, and hazardous waste management. However, in order to assess impacts, we suggest that the RMP/EIS include a more comprehensive ground water inventory or schedule necessary assessments.

Grazing/Range Management

Rangeland ecological condition is described in terms of seral stages. The terms "satisfactory" and "unsatisfactory" are also used to describe rangeland condition. We recommend that the RMP/EIS define this terminology more specifically in terms of watershed stability and erosion, and condition of the rangeland ecosystem (fauna, flora, etc.).

We have several concerns regarding the RMP/EIS direction for grazing and range management that we believe should be addressed in revisions to the draft RMP/EIS. These concerns are summarized below.

- Ninety-five percent of the resource area is in a Category I allotment classification (page 3-54), with much of the area apparently in "unsatisfactory" range condition (page A-47). Yet, even with the extensive allotment planning that is anticipated, very little improvement in ecological condition is planned (page 4-66 and Appendix T). How will such little ecological improvement substantively address the extensive "unsatisfactory" conditions, improve watershed stability and riparian problems, and meet FLPMA policy to "protect the quality of . . . ecological . . . values" (Section 102(a)(8))? The FLPMA requirement to protect ecological values should be clearly defined since only Alternative D would protect natural succession areas (page 2-19).

- From the discussion of the preferred alternative on pages 2-11 and 12, it appears that BLM would only protect vegetation resources in certain areas. We believe that grazing requirements should be developed and presented in the EIS that assure vegetation resource protection for the entire area. Furthermore, throughout the discussion of the preferred alternative on pages 2-16, 58, and 76, it appears that BLM's primary emphasis is on livestock use which we feel should be revised to reflect sustained protection of environmental values, and other uses.

- We do not see how the critical thresholds for grazing and the biotic components will effectively provide for rangeland ecosystem needs (pages 4-4 and 5).

[Comment page 3]

Grazing/Range Management

Definitions of ecological condition, satisfactory range condition, and unsatisfactory range condition have been added to the EIS (see revisions to draft Glossary).

Page 3-54. The draft indicates that 95 percent of the area falls within grazing allotments classified as I category (draft page 3-54). Range condition is only one of several criteria that could lead to I category (draft appendix D). (Refer also to the response to comment 3 from the National Wildlife Federation.)

Many allotments are rated I because they are not producing the maximum livestock forage possible. These allotments have potential for more production through grazing systems or land treatments which would increase forage vigor or density.

Page 4-66. Unsatisfactory range condition means that the condition could be improved, but does not necessarily mean that the condition is poor. However, improvement may not result in a change in the ecological condition. This does not indicate a failure on the part of BLM to protect ecological values in accordance with FLPMA. BLM does not agree that only alternative D would protect ecological values (see impact analyses for vegetation, draft chapter 4). Predictions for change in ecological condition in the draft were made conservatively, since there is no set formula to use (draft appendix T).

Page 2-11. BLM routinely protects vegetation resources (draft pages 2-1 through 2-8 and A-2 through A-4). Specific actions for management of vegetation for grazing would be developed in AMPs (draft appendix U). All alternatives assessed in the draft reflected sustained yield and other environmental protection values emphasized in FLPMA (draft page 1-9).

Page 2-16. Review of draft table 2-18 does not show that the preferred alternative emphasizes grazing at the expense of environmental values. For livestock grazing, the impact analysis shows both a loss of area and a loss of income. The analysis shows a gain in the area with significant restrictions on surface development (areas protected for primitive recreation or within VRM class I). The draft states that surface-disturbing uses would defer to management for primitive recreation opportunities (draft page S-4, 2-16, and appendix A; see revisions to draft page 2-15).

Page 4-4. BLM id confident that critical thresholds in table 4-1 adequately provide for rangeland ecosystem needs.

- The preferred alternative would maintain grazing use at "existing levels", yet watersheds would be protected (page 2-15). How is existing grazing use (and its continuation) adequately protecting watersheds? For example, the only reductions of soil erosion by controlling grazing would come from some exclusions and range treatments (page 4-65). Watershed and water quality requirements for grazing management should be included for the preferred alternative objectives (page 2-55).

- How was it determined that there is enough forage to meet "the demand for full active preference" (page 3-57) and still adequately protect/improve multiple rangeland values even though the monitoring to make such utilization decisions is not yet available?

- Under the preferred alternative, new land "treatments" would be done on 241,960 acres (page 2-68) to "increase available forage" (page 2-19). We recommend that the RMP/EIS provide the specific criteria to be used to assure that the expenditure of range betterment funds will result in "benefits to wildlife, watershed", and/or arresting "much of the continuing deterioration" that may exist (FLPMA Section 401(b)(1)).

- Big game wildlife habitat appears to be the focus of the wildlife discussion. How will range management affect other wildlife species and habitat?

- What is the planned schedule for doing new allotment management plans?

Floodplains, Wetlands, Riparian Areas

Another major concern to EPA is the provision of adequate protection for floodplains, wetlands, and riparian areas since "riparian and aquatic habitats are not now actively managed" (MSA page 4350-34). The discussion of existing riparian area and aquatic conflicts on pages 3-50 and 51 is a good start; however, the actual existing conditions (including impaired functions) should be addressed in more depth. Existing condition is strongly suggested by statements in the RMP/EIS that the riparian areas are "heavily utilized" by livestock (page 3-57); that several drainages have "significant downcutting" which is "reducing riparian vegetation" (page 3-33); and that livestock grazing is causing "overutilization of the vegetation and degradation of water quality" (MSA page 4350-65). We recommend that BLM quantify the amount of wetlands that exist in the SJRA.

We support the following statement of BLM direction (page 2-8) for all alternatives:

> Management actions in floodplains and wetlands will preserve, protect, and, if necessary, restore natural functions in accordance with laws, executive orders, and regulations.

RESPONSE TO COMMENT 22 ENVIRONMENTAL PROTECTION AGENCY, REGION VIII

[Comment page 4]

Page 2-15. Maintaining grazing at existing use levels refers to licensed use (draft table 2-7); it does not imply that no changes would be made in grazing management. The preferred alternative provides for intensive management through grazing systems and other means (draft appendix U). If grazing is managed to maintain or improve vegetation cover, watersheds would be protected; the impact analysis shows a decrease in soils loss under the prferred alternative (draft table 2-10 and chapter 4). Specific watershed management requirements would be developed under AMPs.

Page 3-57. Although complete range monitoring data are not available to prove or disprove whether SJRA can produce forage to meet the demand of full active preference, the RMP team range staff used professional judgment in the assumption that this could occur. It was assumed that proper grazing management would provide for multiple rangeland values, and that grazing systems and maintenance of existing seedings are necessary to produce and properly use this amount of forage. The text of the draft has been changed to clarify this (see revisions to draft p. 3-57).

Page 2-68. The RMP provides broad management guidance, not site-specific project planning. Prior to the decision to implement a range project, including land treatments, a benefit-cost analysis and a site-specific NEPA document would be completed (draft page 2-1, A-1, and A-29; also BLM manual section 1740.13).

The text has been clarified to indicate that many wildlife species reside within SJRA (revisions to draft page 3-41). Impacts to any affected wildlife species would be assessed in site-specific documentation prepared at the project planning level (draft pages 2-1, A-1, and A-29).

A specific schedule for developing and implementing AMPs will be presented as part of the RPS concurrently with the final RMP (draft page I-10).

Floodplains, Wetlands, and Riparian Areas

BLM quantified the amount of wetland in SJRA (draft page 3-49 and table 3-51); the figure has been revised in response to another comment (see response to comment 3 from the National Wildlife Federation).

BLM lacks data on watershed condition, including riparian areas. Rangeland monitoring studies will provide data on riparian areas, which will be incorporated into future activity planning regarding grazing adjustments or specific range projects (draft appendix J).

BLM appreciates this support of direction on draft page 2-8 used for all alternatives.

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However, we found this direction to lack sufficient support in the rest of the RMP/EIS and MSA. For example, the "use pressure now occurring on riparian and aquatic habitats . . . is expected to continue, causing this type of habitat to continue to degrade in quantity and quality" (MSA page 4350-49). As another example, how is the direction to "preserve", "protect", and "restore" adequately supported by the additional direction to "minimize degradation of aquatic habitats" (also from page 2-8)? We recommend that the direction under the preferred alternative for riparian vegetation be more precise and comprehensive (page 2-88 and A-20). Additionally, we suggest that Table AB-1 include riparian/wetland implementation actions.

The preferred alternative would protect only two areas, upper Indian Creek (a trout fishery) and Cajun Pond (page 2-16). Indian Creek would have 20 acres excluded from grazing versus 220 acres under Alternative D (page A-172). Numerous other allotments would have riparian areas excluded from grazing under non-preferred alternatives (pages A-168 through 179). Consequently, we are concerned about how the preferred alternative will provide adequate grazing management and control if exclusions are not planned. A more aggressive action plan is recommended. Additionally, the preferred alternative direction to not allow "Grazing and other livestock uses" in floodplain/riparian areas (page A-20) is not consistent with the rest of the RMP/EIS.

The impact disclosure for the preferred alternative calls for a "net increase of about 140 acres of riparian/aquatic habitat" (page 4-67). Is this creation of new habitat? We question whether this objective is adequate or an appropriate measure given the problems that have been identified. We recommend that the environmental disclosure address much more specifically the over-all effects (including impacts on functional values) to riparian areas and wetlands by alternative.

The RMP/EIS (pages A-63 and 73) and MSA (page 4350-65) estimate 38,400 acres of aquatic and riparian area (based on a .13 mile average width). Floodplains and areas with high seasonal water tables are said to total about 55,000 acres on page 3-33. Yet, on page A-20, only 1500 acres are stated to be floodplains and riparian/aquatic areas (based on a 25 foot average width). We request the use of consistent, accurate acreages for floodplains, riparian areas, and wetlands. Documentation for using only a 25 foot average width is also requested.

Other EPA recommendations include:

- listing of projects to be initiated under BLM's Riparian Area Management by Objectives program,
- description of specific standards and objectives for wetland-riparian area restoration and improvement,
- inclusion of RMP guidelines for forage utilization rates, streambank protection, wetland protection/rehabilitation, and for preservation of over-hanging vegetation,

RESPONSE TO COMMENT 22 ENVIRONMENTAL PROTECTION AGENCY, REGION VIII

[Comment page 5]

The MSA indicates that degradation of riparian habitat has occured. BLM will provide corrective management actions. The management common to all alternatives includes administrative changes needed for proper resource management, as well as some prior management pracices (draft figure I-3).

Table AB-1 shows how plan decisions will be implemented. For each management program (table 2-7), the RMP provisions would be applied to all actions. Under the preferred alternative, the riparian special conditions (appendix A) would become part of the plan decisions.

All riparian areas will be protected as required by laws, executive orders, and regulations (draft page 2-8). In the draft, upper Indian Creek and Cajon Pond would have additional special management. Cajon Pond is in the proposed Hovenweep ACEC (see revisions to draft chapter 2 and appendix I). After the draft was issued BLM decided the upper Indian Creek drainage did not need a livestock exclusion (see revisions to draft page 5-2). Specific riparian areas may be closed to grazing later through AMPs. However, most riparian areas can be managed for improvement while allowing some grazing.

Page A-20. The exclusion of grazing and other livestock use in riparian areas under alternative E was an error (see revisions to draft appendix A).

Page 4-67. The riparian habitat increase is in comparison to the impacts for alternative A in the year 2000, not to the existing situation (draft page 4-2). The habitat would increase as a result,either when a current loss ceased to occur or when existing riparian areas expand (draft pages 4-67 and 4-68). This does not imply that riparian areas will be created where none now exist, and is not an objective but a projected impact.

BLM lacks data on watershed and riparian areas. More specific discussion of the effects of alternative management on functional values of riparian areas would require more detailed information than is now available on existing condition, specific problems and their causes, and projected solutions.

BLM has revised the corridor width. The riparian acreage on draft page A-73 reflects the riparian corridor of 660 feet used in the MSA (draft page A-61, A-73); the draft used a corridor of 25 feet (draft page A-20). The corridor width used in the final EIS is 100 feet, or 6,000 acres (see revisions to draft page 3-49, table 3-6, and chapter 4). Draft appendix H has been revised to clarify the rationale behind changing the MSA figures.

Projects listed under BLM's Management by Objective program would come from activity plans and project plans developed after the RMP. Watershed activity plans have been added to the proposed RMP (appendix B).

Objectives for individual wetland-riparian areas would be developed later through activity plans. The level of detail included in the RMP (draft page 2-8 and table 2-5) is believed appropriate for a broad-scale land-use plan, given the level of detail of inventory information available to BLM.

The draft has been revised to include guidelines for forage utilization rates (see appendix BB). Guidelines for protection or preservation of specific areas would be developed through activity plans, as stated above.

o and a description of how future actions will comply with Executive Orders 11990 (Protection of Wetlands) and 11988 (Floodplain Management).

Special Management Designations

Several potential ACECs were identified because of hazardous and sensitve watersheds with various erosion, riparian, water quality, and aquatic life problems (pages A-69 through 71 and elsewhere in the RMP/EIS, and MSA pages 4340-27 through 33). These areas were not recommended for ACEC designation in the preferred alternative apparently because it was felt that project-specific mitigation under existing management and RMP/EIS special conditions would be adequate to address the problems. However, we feel that the draft RMP/EIS did not adequately demonstrate that existing management is sufficient. We have also recommended a pro-active approach in identifying special planning/implementation initiatives for these areas (if an ACEC designation is not recommended), and we have identified problems with the special conditions in Appendix A (refer to our watershed and riparian comments).

We feel that ACEC designation can be an important opportunity to initiate needed plannning and to seek planning/implementation funding. Consequently, we suggest a re-evaluation of the draft RMP/EIS decision to not propose these areas as ACECs.

Minerals Management

FLPMA requires that mining activities be regulated "to prevent unnecessary and undue degradation of the land" (Section 302(b)). We question whether management objectives for the preferred alternative are consistent with this provision since the only protection would apply to "certain recreational values" (page 2-53). The FLPMA requirements should be defined in relation to minerals activities meeting water quality standards and antidegradation requirements. Objectives for protecting watershed, wildlife, and riparian area and wetland values also should be included. The above considerations should also be addressed in the discussion of mining claim administration on page 3-21.

With renewed interest in gold mining along the San Juan River (page 3-31), EPA recommends that the RMP/EIS describe how mining is being planned and managed to protect water quality standards and riparian-wetland values.

We question why BLM is proposing to have no oil and gas seasonal restrictions for wildlife (page S-2). We suggest inter-agency coordination in developing a consensus on needed restrictions.

Wilderness

EPA's review of the Utah BLM Statewide Wilderness Draft EIS (copy enclosed) states our recommendation for using the local RMP/EIS process for analyzing wilderness suitability and other multiple resource decisions by alternative. BLM would then submit the Wilderness Study Reports in the context of current RMPs and Management Framework Plans, on a Statewide basis, to Congress as planned. A Statewide Programmatic Wilderness EIS is suggested. In this manner, we feel that competing uses, appropriate management, and trade-offs associated with wilderness or non-wilderness designations can be most effectively addressed.

[Comment page 6]

Because BLM cannot predict what future actions might be proposed, compliance of specific future actions with executive orders would be determined either through an activity plan or at the time a specific proposal is received.

Special Management Designations

BLM agrees that ACEC designations are important. BLM assumed that any alternative selected would be adequately funded (draft page 1-2), and does not see ACEC designation as a means to gain additional funding.

The draft has been revised to explain the rationale for decisions to either carry preliminary potential ACECs forward or to drop them from further consideration (see revisions to draft appendix H). Areas were proposed for ACEC designation where special management was believed necessary to protect relevant and important values at risk (see BLM manual section 1617.8.) The prospective ACECs identified to protect riparian areas were not carried forward because development of management prescriptions common to all alternative and special conditions for the preferred alternative were believed sufficient to protect riparian values.

Minerals Management

BLM is aware of FLPMA's requirements regarding unnecessary and undue degradation of public lands (draft page 1-9). The statement cited in this comment concerns acreage available for mine claim location under the different alternatives, not protection from mining activities. The mining laws limit application of alternative management actions to mining activities (draft pages 1-6, 1-10, and 3-21). Guidance for management of mining activies is on draft page 2-3. Objectives and actions for protecting watershed, wildlife, and riparian areas are found in the draft in table S-1, pages 2-7 through 2-8, table 2-5, and appendix A (as revised). These would be applied to any activity, including mining, to the extent possible without curtailing legal rights (draft page 2-1).

RMP stipulations that affect mining along the San Juan River are stated in the draft on page A-25 under the San Juan River SRMA.

Seasonal restrictions to protect wildlife were developed under alternative E, and were included in the impact assessment. Table S-1 incorrectly showed these restrictions under Alternative D (see revisions to draft table S-1).

Wilderness Review

The draft discusses management of WSAs and ISAs if released from wilderness review by Congress (draft page 1-2). In Utah, the wilderness review process is being conducted separately from RMP development. It is assumed that areas released by Congress from wilderness review would be managed for nonwilderness purposes. Therefore, BLM did not attempt through the RMP to protect wilderness values in areas released from wilderness review, nor to assess the impacts to those values.

7

Our concerns are underscored by the preferred alternative intentions to not protect any wilderness values of the Wilderness Study Areas (WSAs) other than primitive recreation and some semiprimitive recreation values in certain areas (page 2-11). We do not feel that cumulative impacts for each WSA under non-wilderness designations have been adequately disclosed in the RMP/EIS (as required on page 1-3).

Threatened and Endangered (T/E) Species

We recommend a revision of management objectives (page 2-58) to include all measures needed to conserve threatened, endangered, and sensitive plant and animal species in response to Sections 2(C) and 3(2) of the Endangered Species Act. We believe that neither Table 2-10 or the Environmental Consequences chapter adequately describe projected impacts to T/E species and habitat.

Monitoring

We commend BLM for including a monitoring appendix. Due to the technical complexities involved in designing and implementing a monitoring program that adequately links management activities with water quality and watershed objectives (including antidegradation requirements and other narrative WQS such as for aquatic life, as well as numeric WQS), the RMP should be quite specific about BLM plans to conduct monitoring and evaluations to determine achievement of water quality objectives. We suggest that the following components of the comprehensive water quality monitoring strategy be addressed to the extent possible (in the monitoring appendix) at this level of planning:

- goals and objectives (including effects on endangered species),
- types of surveys (long-term or intensive) or assessments (including habitat evaluations and biomonitoring) to be used,
- parameters and frequency to be monitored and their suitability in achieving the monitoring goals and objectives,
- applicability of existing asssment models such as COWFISH for assessment of existing conditions related to attaining or maintaining fish habitat,
- management and environmental indicators, e.g., aquatic habitat, macroinvertebrates, and sediment delivery, to be used in assessing impacts of past, ongoing, and proposed activities,
- use of activity monitoring in sensitive areas,
- monitoring responsibilities of BLM, mineral development lease/claim holders, and other state and federal agencies,
- mechanism for monitoring implementation,
- determination of adequacy of best management practices,
- reporting requirements,

RESPONSE TO COMMENT 22 ENVIRONMENTAL PROTECTION AGENCY, REGION VIII

[Comment page 7]

Threatened and Endangered Species

Upon review, BLM has accepted the suggestion to change the wording of management objectives for T/E species (see revisions to draft table 2-5). General guidelines for management of T/E species are on draft page 2-8. BLM is confident that draft table 2-10 and chapter 4 adequately project impacts to T/E species (see, for example, draft page 4-53 and 4-54). As stated on page 2-8, BLM would not knowingly allow any actions to occur on public lands in SJRA that would jeopordize a T/E species or its habitat.

Monitoring

BLM appreciates this comment's support of the monitoring appendix.

In response to this comment, BLM has added an element to table AB-1 regarding implementation of a water quality monitoring plan for SJRA (see revisions to draft appendix A). BLM believes the level of detail suggested by this comment would be inappropriate at the RMP level of planning; however, the change to table AB-1 would provide a framework to establish the detailed strategy recommended. This comment will be reviewed when a detailed water quality monitoring plan is prepared.

It is not possible for BLM to routinely monitor every water source within SJRA. State law ensures that public drinking water supplies are monitored monthly. No antidegradation segments have been established within SJRA. Most of the waters the state has classified either do not fall on public land within SJRA, or drain a much greater area (see comment response, above).

BLM accepts responsibility to protect and enhance the quality of water on public lands in accordance with law. The Federal Water Pollution Control Act Amendments of 1972 (33 U.S.C. 1151 et seq.) require extensive water data to support establishment of reasonable standards and assessment of causal relationships. However, the laws do not provide a mechanism to ensure a given level of either baseline data collection or compliance monitoring.

- o aquatic life objectives, monitoring methodology, and threshold levels for modification in management direction,
- o the feedback loop (with more specifics than on page A-30) to achieve timely modifications to activities in response to monitoring results.

Funding for water quality monitoring to determine compliance with WQS and trends "will depend on the funding necessary to accomplish the field and laboratory work" (page 3-36). We would like the RMP to take a much more aggressive approach in budgeting for monitoring as an essential aspect of multiple use management.

As part of rangeland management, monitoring may be necessary to measure changes in water quantity and quality. We believe that measurement of water parameters needs to be an integral part of the comprehensive monitoring plan.

Monitoring objectives for soil and water on page A-36 should relate directly to compliance with WQS (including aquatic life and other beneficial uses), and soil loss objectives.

Other Concerns

Extensive site-specific project planning and impact analysis/disclosure will be done under this broad RMP/EIS. We believe that there will be a continuing need for public and other agency involvement in planning some of these projects (rather than just having the analyses available in the BLM office). The strategy for this involvement should be addressed in more detail. The water quality-related coordination and consultation with other government agencies should be described. We suggest periodic Federal/State inter-agency meetings called by BLM as part of a continuing coordination strategy. The RMP should identify procedures that will be used to ensure consistency with water quality management plans for the area that have recently been completed by the Southeastern Utah Association of Local Governments (SEUALG). How will BLM cooperate with the Utah Bureau of Water Pollution Control and the SEUALG (since they are not listed as being consulted during the planning process on pages 5-3 and 4)?

We commend the inclusion of alternative budgets and the implementation schedule. We believe that RMPs are very important in identifying priority projects and for setting budget priorities. What is the budgeting process to implement RMP-identified programs? Numerous plans are scheduled for completion within one year of RMP approval (Table AB-1). Is this realistic? We request that table AB-1 be expanded to list the specific inventories, assessments, and management plans to be done (in priority order) along with the planned schedule for competion. Of particular concern to EPA to have included are: water quality/aquatic life assessments; watershed and related activity plans; salinity control plans; cooperative management plans; wetland and riparian area inventories; riparian area and wetland management plans; and peregrin falcon and black-footed ferret inventories (refer to page 3-53).

[Comment page 8]

Other Concerns

Activity plans and site-specific project planning will be subject to the NEPA process, which allows for continued public involvement (draft pages 2-1, 5-10, A-1, and A-29).

Consultation with other agencies is part of the NEPA process. BLM cooperates with several state and federal agencies on water quality sampling and analysis (see revisions to draft chapter 5). Data are maintained on the USGS STORET system (draft pages 2-7 and 2-8).

BLM appreciates this comment's support of the alternative budgets included in the draft. These have been revised in the proposed RMP and final EIS (see revisions to draft tables 2-4, AK-2, AK-3, AK-4, and AK-5; see also the response to comment 9, Southern Utah Wilderness Alliance.)

RMPs and activity plans are used in varying degrees to develop statewide program packages for budget requests. The BLM Washington Office, Department of the Interior, and the Office of Management and Budget then prepare the President's budget submission to Congress. It is assumed (draft page 1-2) that BLM would support funding of the projects in the RMP, or else the RMP would not be approved. Congress determines relative budget priorities and funds BLM by program; there may be a discrepancy between what is submitted to Congress and what Congress allocates.

At the time the final RMP is prepared, table AB-1 will be revised to be as specific as possible, and will be prioritized where feasible (see the proposed RMP in volume 1). However, a broad-scale land-use plan does not delve into site-specific projects.

Table AB-1 has been revised to include an element for inventory and assessment of watershed- and wildlife-related topics mentioned in this comment (see revisions to draft pages A-36 and A-37).

9

We recommend that the implementation schedule show the inventories needed for identifying "sites with potentially hazardous wastes" (page 2-8). The most recent BLM policies for inventorying and development of management plans should be included. The inter-agency coordination strategy for this program should also be described.

We request that certain parts of Table 2-10 be revised to document in narrative format the "Summary Comparison of Impacts". This is specifically needed for: water quality standards compliance (including chemical, physical, and biological integrity); qualitative impacts to vegetation from grazing; qualitative impacts to watershed quality; and qualitative impacts to wildlife habitat.

Under discussion of NEPA compliance on page A-37, we suggest a revision specifically noting the need to assess and document both activity-specific and cumulative impacts using all available tools and methods.

RESPONSE TO COMMENT 22 ENVIRONMENTAL PROTECTION AGENCY, REGION VIII

[Comment page 9]

Page 2-8. The general management objectives of the hazardous waste program have been revised (see revisions to draft page 2-8). Table AB-1 has been revised to include an element for hazardous materials inventory (see revisions to draft appendix A). Because agency guidance for this program remains pending, the RMP/EIS can not identify specifics.

Table 2-10 summarizes the extensive impact assessment narrative in chapter 4. NEPA guidance directs the agency to provide quantitative data where possible; qualitative data on impacts to watershed quality and wildlife habitat from grazing are not available and would be intrinsically subjective.

The discussion of the NEPA process on draft page A-37 is a footnote, and so is necessarily abbreviated. An expanded discussion of the NEPA process in relation to activity-specific projects is found in the draft on pages 2-1, 5-10, A-1 and A-29. NEPA requires consideration of cumulative impacts; it was assumed that site-specific NEPA documentation would comply with law (draft page 1-10).

NOTE: Comments addressed to BLM's Utah State Director regarding the statewide wilderness EIS were included with this comment letter but have not been reprinted.

Change to the EIS? Yes.

POLICY AND PROCEDURES

"Review of Federal Actions Impacting the Environment," EPA, Office of Federal Activities, Washington, D.C., October 3, 1984.

SUMMARY OF RATING DEFINITIONS
AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

COMMENT 23

United States Department of Agriculture | Forest Service | Manti-LaSal National Forest | 599 West Price River Drive Price, Utah 84501

Reply to: 1900

Date: October 27, 1986

Mr. Ed Scherick
San Juan Resource Area Manager
P.O. Box 7
Monticello, Utah 84535

Dear Ed:

We appreciate the opportunity to comment on the San Juan Resource Management Plan and hope that our comments will be beneficial to you. The document is generally well put together and adequately displays alternatives. We like your use of figures and text to convey the information needed to understand the alternatives. However, we feel an opportunity exists for public misunderstanding of the documents. The opportunity for misunderstanding is caused for the most part by the way data or information is presented on the figures. The presentation may demand a greater level of knowledge than the public may poesess.

- Figures S-1 through S-4 show the boundary of the San Juan Resource Area to include most of San Juan County, but do not make clear that Canyonlands National Park, Glen Canyon National Recreation Area, the Navajo Indian Reservation, the Manti-LaSal National Forest, and land in State and private ownership are not covered by this Management Plan. The figures portray these lands as being areas of standard surface use. National Forest System (NFS) lands are managed by direction in the Monticello Unit Plan approved in 1976 until it is superceeded.

- Figures 2-12 through 2-15 display the Potential Land Treatments under the various alternatives, and it appears that even in Alternative E, where 241,960 acres are treated, the acreage is a small part of the whole. However, if the lands in State, private, and other agency control are identified, the treated and untreated public lands in each alternative would be more apparent and possibly more significant. If you persist not eliminating State, private, and other Federal lands on the plats, then you should show the acreage these other agencies expect to treat.

- In Figure I-6, the implication is there are no valid claims. We understand a valid claim transfers mineral rights to an individual, even though it might be temporary. You might want to make a footnote that the plat is correct subject to existing valid claims.

- In Figures 3-1 through 3-8, the minerals problem is compounded on Figure 3-1. The reader is left in doubt by the white area which includes State, private, and other Federal lands. Category 4 might be lands covered by other Land and Resource Management Plans, or categories 1 through 3 might be extracted from the plans and displayed on the plat.

RESPONSE TO COMMENT 23 — FOREST SERVICE, MANTI-LASAL NF

[Comment page 1]

BLM appreciates this support of the document and agrees that public misunderstanding is possible with a complex array of alternatives.

Figures S-1 through S-4. The summary figures could be interpreted to imply that lands not managed by BLM fall under standard surface use. The ownership setting and federal administration setting are described in the introduction (draft tables I-3, I-4 and I-5) and are mapped (draft figures I-4, I-5 and I-6). The format of the summary maps has not been changed for this proposed RMP and final EIS; however, its map does distinguish surface management.

Figures 2-12 through 2-15. The potential land treatment maps indicated that acreages applied to public lands only (see legend). State and private lands were not shown on most maps because of the scale. Because the land ownership pattern is regular throughout most of SJRA, and because private lands are clumped in the northeast part of SJRA, surface ownership was shown only in figure I-5. This was believed sufficient for analysis purposes. Ownership is shown on the proposed RMP map.

Figure I-6. BLM does not agree that figure I-6 implies there are no valid claims. This figure shows mineral ownership. Although a valid mining claim gives the mining claimant broad rights to develop locatable minerals, ownership of the minerals remains with the Federal Government until the mining claim is patented. Neither the surface nor the mineral estate of a patented claim belongs to the Federal Government.

Figure 3-1. As noted above, state and private lands were not shown on most maps because of the scale. Figure 3-1 shows the existing situation as far as oil and gas leasing categories are concerned. The pattern of state sections shows up in some areas because of the way the categories are shown on BLM master title plats; however, the legend indicates that only public land/federal minerals acres were used.

Oil and gas leasing categories have a very specific meaning in terms of public land management (draft page 3-1 and appendix L). The system does not provide for categorizing lands managed by another federal agency. The leasing categories shown in figure 3-1 correlate with the leasing categories in table 3-2, which are taken from BLM master title plats. The draft did not use a four-category leasing system, but the proposed RMP and final EIS does (see revisions to draft page 3-1 and appendix L).

- Figures 3-2, 3-4, 3-7, and 3-8 provide minerals information on lands other than public lands. Figure 3-5 provides minerals information for public lands only, and Figure 3-6 does not provide the same level of information on State, private, and NFS lands that it provides on other lands. It infers they are all open to entry when there are several withdrawals made on NFS lands.

- The level of information on all of the figures should be coordinated.

On page I-10, the Draft indicates the SJRA is responsible for management of minerals resources on lands administered by other Federal Agencies. We suggest that the SJRA cooperatively manages but it is not responsible, at least insofar as NFS lands are concerned. The text should be corrected and Table I-4 revised to clarify this cooperative relationship in minerals management in the following manner:

- The Forest Service must consent to any leasing. APD's and proposed lease areas are sent to the Forest for recommendations on stipulations. Any surface operations are subject to Forest Service regulations. Areas have been closed to mineral leasing as a result of Unit or Forest planning.

- The Forest Service has full control over the saleable minerals.

- Locatable minerals activities on NFS lands must comply with Forest Service regulations in 36 CFR 228.

In correcting Table I-4, we suggest the 152 acres at the Baker Ranger Station is managed similar to NFS lands.

Our records show the NFS lands to be 366,641 acres which is less than 366,853 acres you show in tables and text.

Dark Canyon Wilderness, by law, is 45,000 acres and is closed to entry and leasing. The text, figures, and tables should be corrected to show this. Also there are other NFS lands that have a no surface occupancy stipulation that affects mineral activities.

One of the public issues that you have not addressed is the proposed elk transplant on the Blue Mountains, nor have you addressed the existing elk herd. These animals have been seen wintering on public lands adjacent to the National Forest. They may conflict with grazing use by domentic livestock and deer.

Sincerely,

W. Peek

for
REED C. CHRISTENSEN
Forest Supervisor

RESPONSE TO COMMENT 23 FOREST SERVICE, MANTI-LASAL NF

[Comment page 2]

Figures 3-2, 3-4, 3-5, 3-7, and 3-8 show areas believed favorable for minerals occurrence. In favorable areas, deposits have an equal probability of occurring below state, private, or federal surface.

Figure 3-6. As stated on draft pages 3-18 and 3-19, figure 3-6 shows lands with federally owned locatable minerals that are not open to entry under the federal mining laws. The laws do not apply to nonfederal minerals (draft table I-4 and figure I-6). BLM is aware that Congress established the Dark Canyon Wilderness September 28, 1984 (16 U.S.C. 1132, 1982 (Supp II, 1984)), and that designated wilderness areas are generally withdrawn from mineral entry (16 U.S.C. 1133, 1982). The draft has been revised to show this area as not open to mineral entry (see revisions to draft figure 3-6). BLM master title plats (October 1985) do not show other withdrawals on USFS lands in SJRA (except 150 acres, shown in draft table 3-4). The Record of Decision and Summary, Land and Resource Management Plan, Manti-LaSal NF, dated November 5, 1986, does not appear to show any withdrawals, either in the text or on the map. The Manti-LaSal plan indicates ongoing withdrawal review, by fiscal year, of areas withdrawn under obsolete executive orders (repealed by FLPMA), but does not indicate that any areas have been withdrawn from mineral entry since 1976 (such as the Dark Canyon Wilderness). BLM would revise figure 3-6 if provided with specific information, although this RMP/EIS addresses BLM management of BLM-administered lands and resources, not USFS management of USFS-administered lands.

BLM is confident that each figure shows the level of information appropriate to the topic being discussed.

The statements regarding management of salable minerals have been changed (revisions to draft page I-10). BLM considers USFS surface management goals in administering leasable minerals (see revisions to draft page 5-2).

Table I-4 shows management of mineral resources, not surface administration. The minerals below the Baker Ranger Station, under an administrative withdrawal, are managed by USFS. BLM participates in the administration of minerals under the remainder of the NF.

BLM master title plats indicate the acreage of the Manti-LaSal NF to be that shown in the draft. BLM has changed the acreage in the proposed RMP, but not in the final EIS because the difference in acres would not change the analysis.

The text and maps of the draft have been corrected as requested regarding the Dark Canyon Wilderness (see revisions to draft pages 1-4 and 3-23).

BLM did not address elk in SJRA because only about 25 animals winter on public lands (MSA page PP-69). When the elk population increases to the point that management of their habitat in SJRA becomes a concern, the RMP will be modified if necessary (draft page A-30). Similarly, impacts of the proposed elk transplant would be assessed when a specific proposal is received (draft pages 2-1, A-1 and A-29).

Change to the EIS? Yes.

COMMENT 24

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS

Navajo Area Office
Post Office Box M
Window Rock, Arizona 86515

IN REPLY REFER TO:

Environmental Quality

SEP - 8 1986

Mr. Ed Scherick
San Juan Resource Area Manager
Bureau of Land Management
P. O. Box 7
Monticello, Utah 84535

Re: Draft San Juan Resource Management Plan/Environmental Impact Statement

Dear Mr. Scherick:

The draft San Juan Resource Management Plan/Environmental Impact Statement was reviewed by the Shiprock Agency Branch of Land Operations.

Since planning issues do not reflect concerns that are within the jurisdiction of the Bureau of Indian Affairs regarding Navajo Indian lands, we do not offer any comments.

Sincerely,

Wilfred Begay

Acting Assistant Area Director

cc: 204-Environmental Services Staff

RESPONSE TO COMMENT 24 BUREAU OF INDIAN AFFAIRS, NAVAJO AREA OFFICE

[Comment page 1]

BLM appreciates commentor's review of the draft.

Change to the EIS? No.

COMMENT 25

United States Department of the Interior

BUREAU OF RECLAMATION
UPPER COLORADO REGIONAL OFFICE
P.O. BOX 11568
SALT LAKE CITY, UTAH 84147

IN REPLY REFER TO: DPO-150/UC-152/
UC-151

AUG 18 1986

Memorandum

To: Mr. Ed Scherick, San Juan Resource Area, Bureau of Land Management, P.O. Box 7, Monticello, Utah 84535

From: Acting Regional Director
Bureau of Reclamation

Subject: Review of Draft Resource Management Plan/Environmental Impact Statement for the San Juan Resource Area

We have reviewed the subject document as requested and have the following comments:

Page 3-41, second paragraph under "Wildlife"; "Certain fish in the San Juan River . . ." should be changed to the specific individual species name. The only threatened or endangered fish known to occur in the San Juan River is the Colorado River squawfish, and the last confirmed capture of this species was in 1979.

Page 3-52, eighth paragraph under "Threatened and Endangered Animal Species"; All references to humpback sucker should be changed to read razorback sucker.

Thank you for the opportunity to review the subject document.

cc: Regional Environmental Officer
Department of the Interior
P.O. Box 25007
Denver Federal Center
Denver, Colorado 80225

RESPONSE TO COMMENT 25

BUREAU OF RECLAMATION
UPPER COLORATO REGIONAL OFFICE

[Comment page 1]

The text of the draft has been revised to accommodate the suggestions regarding threatened and endangered fish (see revisions to draft pages 3-41 and 3-52).

Change to the EIS? Yes.

COMMENT 26

United States Department of the Interior

BUREAU OF RECLAMATION
UPPER COLORADO REGIONAL OFFICE
P.O. BOX 11568
SALT LAKE CITY, UTAH 84147

IN REPLY REFER TO: UPO-150/UC-151

AUG 29 1986

Memorandum

To: Mr. Ed Scherick, San Juan Resource Area, Bureau of Land Management, P.O. Box 7, Monticello, Utah 84535

From: Acting Regional Director
Bureau of Reclamation

Subject: Review of Draft Resource Management Plan/Environmental Impact Statement for the San Juan Resource Area, Moab District

Please add the following comments to our previous correspondence dated August 18, 1986:

We do not feel that implementation of any of the alternatives being studied would materially impact any existing or proposed project under the jurisdiction of this office. The study area is small and yields relatively little water.

The discussion of salinity is too general to be reviewed in detail. However, we have no reason to dispute the information presented. On Pages 3-37, it would be useful to specify where and when the salinity level was measured.

We could find no discussion of the potential for the alternatives to affect the quantity of water generated by the resource area. Surface runoff and ground-water recharge may be impacted by livestock use, vegetation manipulation, and mineral development. These impacts would be difficult to quantify and could only be presented generically.

Chapter 5 does not document any consultation with the Bureau of Reclamation. Such contact may help the evaluation of water resources.

Once again, thank you for the opportunity to review the subject document.

cc: Regional Environmental Officer
Department of the Interior
P.O. Box 25007
Denver Federal Center
Denver, Colorado 80225

RESPONSE TO COMMENT 26

BUREAU OF RECLAMATION
UPPER COLORATO REGIONAL OFFICE

[Comment page 1]

Page 3-37. The text of the draft has been revised to provide specifics of salinity measurements (see revisions to draft page 3-37).

Impacts to water quantity were not discussed in the draft. Studies have indicated that large-scale range improvements, such as land treatments, would not result in a measurable change to water quantity [Hibbert, 1979]. Because water quantity would not be affected, it does not need to be analyzed (draft page 4-2).

Chapter 5 inadvertently omitted reference to consultation with the Bureau of Reclamation. The text of the draft has been revised accordingly (revisions to draft page 5-3).

Change to the EIS? Yes.

COMMENT 27

United States Department of the Interior

FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
2060 ADMINISTRATION BUILDING
1745 WEST 1700 SOUTH
SALT LAKE CITY, UTAH 84104-5110

IN REPLY REFER TO:

(ES)

August 11, 1986

MEMORANDUM

To: Area Manager, San Juan Resource Area
Bureau of Land Management, Monticello, Utah

From: Field Supervisor, Ecological Services
Fish and Wildlife Service, Salt Lake City, Utah

Subject: Fish and Wildlife Service Comments on the Draft San Juan Resource Management Plan (RMP) and Environmental Impact Statement (EIS)

We have reviewed the draft San Juan RMP and EIS and offer the following comments for consideration in the final document.

General Comments

We have two general areas of concern after reviewing the San Juan RMP. These are the lack of existing inventories for raptors and other sensitive species and lack of management consideration for the growing elk population.

The San Juan Management Situation Analysis (MSA) (page PP-65) states that raptors and Migratory Birds of High Federal Interest (MBHFI) occur on the resource area. Because inventory data are lacking, it is not possible to make the balanced decisions regarding these species necessary for multiple use mangement. The plan should contain a clear policy to inventory for and protect habitats for sensitive species such as the golden eagle, ferruginous hawk, and prairie falcon. For instance, disturbance associated with oil and gas field development during the breeding season may lead to nest failure or abandonment by these species if it occurred near active nests. In our specific comments we have recommended mitigation measures which should be adopted to protect habitat for these species and big game species on the resource area.

The San Juan Resource Area (SJRA) contains winter habitat for the elk population referred to on page PP-69 of the MSA. This population has more than doubled in size to 50-75 animals and continues to increase. Management of habitat for elk should be addressed in the RMP and critical habitat should be protected on the resource area if it exists. This population should also be augmented with transplanted animals.

The demand for both consumptive and nonconsumptive uses of fish and wildlife resources is continually increasing. Alternative C, which emphasizes wildlife more than other alternatives, allows for substantial

RESPONSE TO COMMENT 27 FISH AND WILDLIFE SERVICE, ECOLOGICAL SERVICES

[Comment page 1]

General Comments

The need to provide ongoing data collection, such as suggested in this comment, is not a planning decision per se because it does not require a land-use allocation. As such, it does not have to be spelled out in the RMP. However, BLM recognizes the need to update the data base used for the RMP, through agency-initiated inventories or other means. Wildlife habitat inventory is a continuous process, and as more information becomes available, it will be incorporated into the RMP, and planning decisions will be changed as necessary (draft appendix B).

It is BLM policy to protect the habitat of the sensitive species mentioned in this comment. Prior to approving a proposed action, BLM would survey the affected area for habitat used by sensitive species and prepare appropriate NEPA documentation. The text of the draft has been revised to discuss coordination with USFWS on recovery plans for threatened, endangered, or sensitive species (see revisions to draft page 2-8). (See also the responses to comment 3, National Wildlife Federation, and comment 4, The Nature Conservancy, on this topic.)

Management of elk habitat in SJRA was not discussed in the draft because only about 25 animals winter on public lands (MSA page PP-69). The possibility of increasing the elk herd on the Manti-LaSal NF through transplants was discussed in the MSA (page PP-69) and the draft (page 5-8). Both documents state that the RMP would be revised if necessary because of elk transplants. (See also the response to comment 23, U.S. Forest Service, Manti-LaSal NF, on this topic.)

growth of wildlife populations. However, even this alternative allots only 17,300 acres to wildlife, 1% of the acreage grazed by livestock. Management costs for the livestock grazing program are almost three times higher than costs for wildlife and riparian/threatened and endangered (T&E) species habitat management combined. Returns to the resource area from the grazing program are not indicated in the RMP. Through recreational hunting, wildlife can be much more important economically than the RMP indicates (Table 2-10, page 2-99).

Specific Comments

Page 2-88, Table 2-9, Wildlife population goals: These should be specified for all alternatives.

Page 2-89, Table 2-9, Crucial habitat protection: Grazing should be excluded from sensitive areas except where needed for wildlife habitat improvement. Also, the following mitigation measures should be requirements in any alternative adopted:

1. Surveys for raptor nests should be conducted within 0.5 mile of any proposed surface-disturbing activity prior to approval of the activity. Site-specific buffer zones should be established for each nest.

2. Surveys for MBHFI should be conducted prior to any surface-disturbing activity.

3. Road construction should be planned to avoid state identified resident wildlife critical habitats of sensitive species as much as possible.

4. Construction, other surface-disturbing activities, and ORV use should be avoided in state identified resident wildlife critical habitats during their seasons of during their seasons of use.

5. All disturbed areas should be reclaimed using native plant species.

6. On- and off-site enhancement measures such as construction of new and maintenance of existing water sources and preservation of nest trees and snags should be committed to.

Page 2-91, Table 2-9, ORV use designations: Recreational activities should be restricted within 0.25 mile of water developments.

Page 3-38, Paragraph 2: We recommend designation of Bridger Jack Mesa and Lavender Mesa as ACEC's.

Paragraph 3: Forest resources are of greater than incidental value providing, among other values, nest sites for migratory birds and thermal cover for elk and deer.

Page 3-42, Paragraphs 2-4: Paragraph 2 states that evidence of social intolerance between bighorn sheep and domestic livestock is largely circumstantial. Numerous studies (e.g. Albrechtsen and Reese, 1970; Gallizioli, 1977; Bailey, 1980) indicate bighorn sheep cannot

RESPONSE TO COMMENT 27 FISH AND WILDLIFE SERVICE, ECOLOGICAL SERVICES

[Comment page 2]

Alternatives A, C, D, and E indicate that 17,300 acres are formally allotted to wildlife (draft page 2-67); this does not represent the acreage actually used by wildlife. Deer and other wildlife species have access to most of SJRA; not all of the acreage in grazing allotments is used by livestock.

Hunter expenditures were based on a 1980 survey taken in Utah [USDI and USDC, 1980]. The local economic importance of the livestock industry was included in the draft (see draft appendix R for methodology of economic analysis of both hunting and livestock).

Specific Comments

Page 2-88. Table 2-9 has been revised as suggested (see revisions to draft page table 2-9). No population goal is given for alternative A because no specific population goal now exists.

Page 2-89. The preferred alternative excludes grazing from crucial habitat areas where a conflict between wildlife and livestock use was determined to exist. The proposed grazing management would provide for maintaining or improving wildlife habitat in other habitat areas.

The draft has been changed to state that most of the suggested measures are in use (see revisions to draft page A-4). Surveys for migratory birds of high federal interest would be ongoing, and data would be shared with USFWS (draft page 2-1). Native plant species are not always preferred for reclamation; exotic or adventive species sometimes provide better ground cover or forage. Mitigation or enhancement of habitat could be determined for a project, but would not be desirable, applicable, or enforceable in all cases (draft page A-1). Nest trees used by raptors are protected (see revisions to draft page A-4). Offsite water sources for wildlife have not been needed because most range water projects provide more water than the livestock can use.

Page 2-91. Limits on ORV use are made in response to a specific resource conflict (draft appendix E). Table 2-9 (draft page 2-91) indicates, under the different alternatives, where ORV use would be restricted to protect riparian areas. A 100-foot corridor was used (see revisions to draft page 3-49).

Page 3-38. Bridger Jack and Lavender Mesas have been recommended as ACECs in the proposed RMP and final EIS (see revisions to draft figure 2-6 and table 2-6). BLM agrees that forest resources have greater than incidental value (see revisions to draft page 3-38).

Page 3-42. BLM has read this literature. The RMP source [King and Workman, 1983] did not conclude that bighorn were intolerant of cattle; cattle and bighorn used different grazing areas (draft page 3-42). Even so, in areas where conflicts could occur (118,780 acres) livestock grazing was excluded in the proposed RMP to benefit the sheep. Monitoring should indicate whether the areas set aside were too large or not large enough (draft appendix B).

compete with cattle. Overgrazing by domestic livestock and perhaps the mere presence of cattle on bighorn sheep ranges is a major reason for the continuing decline of some sheep populations and for the failure of others to increase. It is essential that state identified critical habitat be excluded from grazing and protected from overuse by recreational and mining activities. Stipulations on oil, gas, and other mining leases should protect all state identified critical habitats during their main seasons of use.

Paragraph 5: Additional water sources should be developed in state identified critical sheep habitat. It is also essential to maintain developed water sources.

Page 3-52, Threatened and Endangered Animal Species, Paragraph 2: Riparian habitats should be protected from grazing and wood cutting.

Paragraph 4: Oil and gas leasing categories along the San Juan River should be redefined to coincide with bald eagle habitat areas.

Paragraph 6: Inventory for peregrine falcons in the SJRA.

Paragraph 7: Inventory for black-footed ferrets in any newly identified prairie dog colonies.

Page 3-53, Specific Indicators Affected: Elk, state identified critical elk habitat, and habitat for MBHFI are additional environmental indicators that could be affected by the alternatives.

Page 3-101, Paragraph 1: This paragraph states that only a portion of the habitat for most wildlife species occurs on public lands and economic values of wildlife are based on that portion. This does not take into account the critical use areas which may be limited or non-existent off the SJRA, such as lambing and breeding areas for bighorn sheep and winter range for deer and elk.

Page 4-5, Table 4-1: The critical threshold for wildlife habitat should be identified. The critical threshold for threatened and endangered species is any action which "may affect" listed species or their critical habitats.

Page 4-7, ASSUMPTIONS, Paragraphs 2-6: Use only native plant species in reclaiming well sites and roads.

Page A-37, Table AB-1, Habitat Management: An additional RMP decision implemented should be to maintain existing and develop new water sources.

We appreciate the opportunity to review and comment on the draft RMP/EIS. If you have questions regarding the wildlife habitat management issues discussed in these comments please contact us.

RESPONSE TO COMMENT 27 FISH AND WILDLIFE SERVICE, ECOLOGICAL SERVICES

[Comment page 3]

Maintenance of existing water sources for bighorn sheep is ongoing, and development of additional water sources has been planned (draft page 2-8 and appendix N).

Page 3-52. The draft states (page 2-8) that habitat for threatened and endangered species will be protected where jeopardized (draft page A-1). Under the preferred alternative, grazing would be excluded from riparian areas where a conflict has been identified. Woodcutting is allowed only in designated areas under permit, and permits have not been issued for riparian areas. Harvest of cottonwood trees (used by eagles) for fuelwood would not be allowed, as harvest of woodland products is limited to juniper and pinyon pine. The area previously having oil and gas lease stipulations to protect bald eagles (draft page 3-52) was adjusted to correspond with the present location of the San Juan River channel (draft figure S-4). As discussed under General Comments above, the RMP does not identify the need for ongoing inventory. BLM would be glad to review additional USFWS inventory data, if any are collected.

Page 3-53. No specific planning decisions were made concerning habitat for elk and migratory birds of high federal interest, due to lack of data concerning these species (draft page 5-8 and MSA pages PP-65 and PP-69). Adverse impact to these species would be handled on a site-specific basis under the routine NEPA process (draft pages 2-1, A-1, and A-29).

Page 3-101. Allocating hunter expenditures based on the proportion of habitat was the best available method of quantifying the relationship between hunter expenditure and wildlife habitat. There is no known method of quantitatively allocating hunter expenditures to habitat based on factors that limit the hunted species' habitat (draft appendix R.)

Page 4-5. The text of the draft has been revised to accommodate the suggestions regarding critical thresholds for T/E species (see revisions to draft page 4-4).

Page 4-7. See the response to comment on page 2-89, above.

Page A-37. Maintenance of existing water sources for wildlife is covered on draft page 2-8. Decisions to develop additional waters would be made within HMPs, at the activity plan level, not in the RMP (draft appendixes B and N).

References:

Albrechtsen, B. R., and J. B. Reese. 1970. Problem analysis of habitat mangement for desert bighorn sheep. Desert Bighorn Council Trans. 14:63-65.

Bailey, J. A. 1980. Desert bighorn forage competition and zoogeography. Wildl. Soc. Bull. 8:208-216. Gallizioli, S. 1977. Overgrazing on desert bighorn ranges. Desert Bighorn Council Trans. 21:21-23.

cc: RO/HR, Denver
UDWR, SLC
UDWR, Price

RESPONSE TO COMMENT 27 FISH AND WILDLIFE SERVICE, ECOLOGICAL SERVICES

[Comment page 4]

BLM appreciates this review of the draft.

Change to the EIS? Yes.

COMMENT 28

United States Department of the Interior

NATIONAL PARK SERVICE

ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:

D7617 (RMR-PP)

NOV 3 1986

Memorandum

To: Resource Area Manager, San Juan Resource Area, Bureau of Land Management, Monticello, Utah

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

Subject: Review of Draft San Juan Resource Management Plan (RMP) and Environmental Impact Statement (EIS) (DES 86/23)

The National Park Service (NPS) has reviewed the subject San Juan RMP/EIS. We appreciate the opportunity to comment. The task undertaken in preparing this extensive document was difficult and complex, and we commend the Bureau of Land Management staff for their endeavors.

Our comments are enclosed. They expand upon the general planning issues identified in our memorandum of September 26, 1983, and other informal contacts between your office and our field offices. For example, Glen Canyon National Recreation Area (GLCA) was provided a copy of the Management Situation Analysis (MSA) in October 1985. The MSA generally presented most of the NPS's concerns and issues involving GLCA, and identified conflicts or differences in our individual agency mandates, policies, and objectives. Much of this information, however, is not carried forward to the RMP/EIS. Accordingly, our comments are quite extensive, as you were alerted by the telephone call from Mr. Kasparek of this office on October 30.

Richard A. Strait

Enclosure

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment cover letter]

BLM appreciates the consideration of the task involved in preparing the draft.

Since the MSA is part of the planning record for this RMP, the draft does not need to repeat all supporting information contained in the MSA. The information in the MSA has been condensed and summarized in the draft; only information needed to support formulation of the alternatives or impact analysis of those alternatives has been carried forward from the MSA.

Within these parameters, BLM intended to bring all relevant information regarding NPS concerns into the draft. For example, NPS concerns regarding grazing management in Glen Canyon NRA are presented in the draft on page I-10, in table I-5, and on pages 1-6, 2-6, 3-53, 4-15, 5-2, 5-5, and 5-8. These sections were thought to include all relevant information originally compiled in MSA part II, section 4322, Grazing Management.

National Park Service
Comments on the
Draft Resource Management Plan and Environmental Impact Statement
for the San Juan Resource Area

GENERAL COMMENTS

The following comments are provided on the basis of the National Park Service's (NPS) Congressional mandate of 1916 to conserve the resources of units within the National Park Service and provide for the enjoyment of those resources so as to "leave them unimpaired for the enjoyment of future generations". The comments are relevant to the Bureau of Land Management's (BLM) proposed plan because of the subsequent 1978 amendment to the 1916 act. That amendment provides that ". . . authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and purposes for which these various areas have been established. . . " (16 U.S.C. 1a-1).

The courts have ruled that the amendment imposes a responsibility on the Secretary of the Interior to protect park resources from threatening activities (keiter, Robert B. Jurisdictional and Institutional Issues: Public Lands, citing Sierra Club v Andrus National Rifle Association v Potter. University of Colorado Natural Resources Law Center 1986). Our first comment, then is that the San Juan Resource Management Plan (RMP) and Environmental Impact Statement (EIS) should recognized and state this statutory obligation of stewardship of the public lands.

The RMP/EIS should further recognize that the public lands adjoining Canyonlands National Park and Natural Bridges National Monument are integral to the reasons these two areas were established as units of the National Park System. The RMP/EIS should acknowledge that management of these public lands is also guided by the legislative history of these two park areas. Such acknowledgement should be addressed as follows: Canyonlands National Park was set aside to preserve "superlative scenic, scientific, and archeologic features for the inspiration, benefit and use of the public. . . " 78 Stat. 934. The legislative history of Canyonlands recognizes features both within and outside of the park as essential to the park's integrity and the visitor's experience in the following narrative:

> "The total assemblage of features and their visual aspect is unique. Nowhere else is there a comparable opportunity to view a colorful, exciting, geologically significant wilderness from above, and then get down into its midst - and still not lose the atmosphere of remote wilderness. . . Scenery alone makes this physiographic unit of national significance and warrants the establishment of a national park within it. . . Archeological, historical, and biological values buttress the significance." H.Rep.No. 1823, 88th Congress, 2nd Session.

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[Comment page 1]

General Comments

BLM is aware that the NPS Organic Act provides that NPS will regulate the use of NPS units so as to leave the lands unimpaired, and will authorize only those uses that will not derogate park values (16 U.S.C. 1 through 1a-1). However, Congress did not provide that this standard of management be applied to public lands, nor that NPS would authorize uses on public lands. FLPMA provides that all public lands (including those adjacent to or seen from NPS units) will be managed to provide for multiple use and sustained yield (43 U.S.C. 1701). FLPMA and other laws governing uses of public lands (draft appendix C) do not require a different, more protective level of management for public lands adjacent to NPS units. (See the response to comment 2, National Parks and Conservation Association, comment pages 3 and 4, on this topic.)

BLM does not agree that the San Juan RMP/EIS should provide background on the reasons for designation of Canyonlands NP. The RMP is a land-use plan that will guide BLM management of public lands and resources in SJRA. It provides neither a general history of the area nor a justification of NPS management practices.

Much of the above language is also incorporated into the Senate Report - which provided background information on why the park was established and referred to Canyonlands as "a vast area of scenic wonders and recreational opportunities unduplicated elsewhere in the American Continent or in the world." S.Rep. No. 381, 88th Congress, 1st Session. Both the Senate and the House reports specifically mentioned areas outside the proposed park boundary; notably, the Sixshooter Peaks were among the features referenced which Congress expected to be "landmarks for centuries to come."

Natural Bridges National Monument was established to preserve and protect the three outstanding natural bridges in the White Canyon system and the exceptional archeological sites within the canyon system and on the mesa tops. The canyon system's connection with areas beyond monument boundaries, the cultural sites which are scientifically related to sites outside of the monument, and the National Park Service's responsibility to provide for visitor enjoyment cause us to be concerned with activities outside of the monument's boundaries. It is reason to identify this relationship in the RMP/EIS.

We note that the September 1986 draft Proposed Revisions to Guidance for the Identification, Evaluation and Designation of Areas of Critical Concern (ACEC) states that the review of potential ACECs ". . . should also take into consideration adjacent Federal land (regardless of jurisdiction) to determine if special area designations currently exist. If the special values upon which the adjacent designation was based extend into the planning area and meet the relevance and importance criteria, they should be treated as potential ACECs in the planning process unless there are compelling reasons not to do so."

The above cited legislation and Congressional attention to features inside and adjacent to Canyonlands National Park and Natural Bridges National Monument support the concept of special designation for BLM lands surrounding these units. NPS concurs with the BLM proposal for ACECs, but we think that under the NPS mandate and Federal Land Policy Management Act (FLMPA) guidelines for ACECs, larger areas should be designated as follows:

*ACEC and Outstanding Natural Area (ONA) for Scenic, Air and Water Resources

The NPS recommends that an ACEC and ONA designation be given to the area within the basin to the east and south of Canyonlands National Park. The objective of such a designation is to help insure that development is compatible, to achieve mutually supportive management for viewshed, watershed and water quality, recreation, and cultural resources by NPS and BLM in those areas and to prevent quality degradation within this region which is so integral to the park visitor's experience. The designation should include the region between the park's boundary to the top of the cliffs between Hatch and Hart's Points, crossing through the upper portion of Hart's Draw to the eastern rim of Bridger Jack Mesa, to Cathedral Butte, along the United States Forest Service boundary to the ridge of North Long Point and the Dark Canyon Plateau and terminating at the San Juan Resource Area boundary. Further analysis and mapping would be necessary to specifically determine the boundaries of this unit. The boundary should be based on the visibility of the area from key views in all districts of Canyonlands National Park.

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
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[Comment page 2]

BLM does not agree that the background for designation of Natural Bridges NM should be contained in the draft RMP/EIS.

NPS received an advance copy of the draft proposed manual section regarding designation of ACECs. Consideration of ACEC designations in this RMP/EIS was based on existing guidance contained in BLM manual 1617.8, not on draft guidance being circulated for agency and public review.

BLM has dropped the ONA designation in favor of the ACEC designation.

ACEC and ONA for Scenic, Air and Water Resources

For a discussion of the ACEC potential for the area within the basin east and south of Canyonlands NP, see the response to comment 2, National Parks and Conservation Association, Canyonlands Scenic and Natural ACEC, comment page 17. Every point raised in this comment was contained in that letter, and has been answered accordingly.

With the same concept in mind, the viewshed around Natural Bridges National Monument should be designated as an ACEC and ONA to prevent land treatments or construction which would impair the visitor experience.

*ACEC for Cultural Resources

The NPS endorses designation of an ACEC for cultural resources on lands adjacent to Canyonlands National Park and Natural Bridges National Monument. Specifically, the ACEC should include the concentration of sites in the Indian Creek, Davis and Lavender Canyons, and the Beef Basin-Dark Canyon complex. The NPS thinks that the protection of these areas is critical to protecting and understanding cultural resources within Canyonlands National Park. Recent archeological investigations indicate that the Beef Basin area was integrally related to the Salt Creek Archeological District habitation, and to lose cultural resources in Beef Basin would be a loss to the understanding of the Salt Creek District. Similarly, it is essential that the cultural resources surrounding Natural Bridges National Monument be protected in order to better understand and protect those cultural resources within this National Park Service unit.

Should the BLM not concur with the NPS recommendation for ACEC and ONA designation, we request that an explanation be provided in the final RMP and EIS. Beyond the specific NPS recommendations, it is important to note that the BLM has inconsistently applied the procedures for ACEC designation. FLPMA suggests that recommendations for ACECs should be consistent among alternatives, and that once an area is recognized for ACEC designation, it cannot be dismissed. This is a serious oversight in the San Juan Resource Management Plan.

Since many of the actions proposed by the San Juan Resource Management Plan may significantly affect natural, cultural, and recreational resources of the national Park System units, we request that assessments of both individual and cumulative impacts from these actions be performed. As an example, the proposed action of designating lands immediately adjacent to a National Park System area as open to off road use should be analyzed for the impacts on those NPS administered lands. Such analysis can assist in achieving compatibility of resource uses in areas related to the National Park units.

The San Juan Resource Area contains cultural and recreational resources which are unsurpassed in the nation. Information provided in the Management Situation Analysis (MSA) prior to the RMP/EIS indicates that BLM is aware of the national significance of its cultural resources, of their fragile nature, and of the widespread destruction now occurring (page 4331-1 and 4331-3). This is neither clearly stated nor adequately considered in the San Juan Resource Management Plan. These resources should be evaluated in a national context in order to hold true to the objective of multiple use of federally managed lands and to best benefit the American public. Such national perspective is of particular concern in the areas surrounding National Park Service units, specifically those areas proposed as ACECs for scenic, cultural, and natural resources. Nontheless, we encourage the Bureau of Land management to recognize the outstanding resources for which they are stewards in the San Juan Resource Area.

3

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment page 3]

For a discussion of the ACEC potential for the viewshed around Natural Bridges NM, see the response to comment 2, National Parks and Conservation Association, Natural Bridges Scenic and Cultural ACEC, comment pages 20 and 21. Every point raised here repeats concerns presented in that letter.

ACEC for Cultural Resources

For a discussion of the ACEC potential based on cultural resource values adjacent to Canyonlands NP, see the response to comment 2, National Parks and Conservation Association, Canyonlands Cultural Resources ACEC, comment page 19. For a discussion of the ACEC potential based on cultural resource values adjacent to Natural Bridges NM, see the response to comment 2, National Parks and Conservation Association, Natural Bridges Scenic and Cultural ACEC, comment pages 20 and 21. Every point raised here repeats concerns presented in that letter.

To qualify for consideration as a potential ACEC, an area must meet the criteria given in BLM manual section 1617.8; at a minimum, an area must meet the two criteria of relevance and importance. Under BLM manual 8410, Visual Resource Inventory, for identification as a candidate potential ACEC for scenic values, an area must be (1) scenic quality A; and (2) unique or very rare within its physiographic province.

FLPMA does not suggest how discussion of candidate ACECs should be presented, nor does it mandate ACEC designation of every area that is measured against the criteria. The statutory requirements of FLPMA regarding ACECs (43 U.S.C. 1701; 1712) should not be confused with the procedural requirements suggested in the draft manual section discussed earlier.

The RMP team identified elements of the human environment that would be affected by the alternatives assessed, and the resulting impacts. Impacts identified as occurring on NPS-administered lands as a result of the RMP alternatives were discussed in the draft (page 4-11, for example). See also the response to comment 2, National Parks and Conservation Association, comment page 4, on this topic.

BLM agrees that SJRA contains cultural and recreational resources that are unsurpassed on NPS units. Information contained in the MSA was condensed for presentation in the draft. The statement regarding significance of cultural resources (MSA page 4331-1) is repeated in the draft on page 3-60; the statement regarding destruction of cultural resource sites (MSA page 4331-3) has been edited slightly but is also found on draft page 3-60. The scope of analysis for estimating impacts in the RMP/EIS (draft page 1-10) is part of the planning criteria, which went through a formal public participation process (draft page 5-9) and incorporate concerns raised by interested parties, including NPS.

On Page S-1 under the "Planning Issues" section, cultural resources are not considered as a planning issue or management concern. The San Juan Resource Management Plan suggests that Federal antiquities legislation mandates protection of these resources from adverse impacts, thereby excluding this topic from any managerial discretion or consideration as a management concern. The claim that cultural resource use and management is "specifically governed by law" and therefore "beyond the discretion" of field office personnel (page 1-6) would appear to be in error. To our knowledge, there are no legal requirements concerning the outcome of cultural resource land use planning decisions, except as they relate to planned consumptive use and procedures for consultation on the plan itself. While an Agency is required to mitigate the inadvertent loss of a cultural resource property caused by a planned action, it is not required to minimize or reduce these actions nor is it required (except as a general charge contained in several pieces of legislation) to protect all properties from unplanned or unauthorized disturbances such as erosion or vandalism. Agency programs designed to curb these disturbances in the field, such as patrol and surveillance and monitoring programs, are clearly discretionary. Also discretionary are land-use allocation decisions, which can serve to increase or decrease these disturbances. If this is the case, then maximum protection should be afforded to these resources and management of cultural resources should be consistent among all alternatives proposed in the San Juan Resource Management Plan. The summary on Page 2-96 indicates variation among alternatives in the total number of sites damaged and protected. This appears inconsistent with the Bureau's interpretation of antiquities protection requirements and indicates that there is discretion.

While we recognize the planning decisions are guided by the principal of multiple use and sustained yield mandated in FLPMA, and that the planning process represents an attempt to balance the highest and best use of a specific parcel with other competing and sometimes incompatible uses, we feel that in this case the process has been subverted by the failure to include the management and protection of cultural resources as a planning issue. A review of the criteria for planning, problem identification, management opportunities, alternative formulation, and estimation of effect (page 1-6 to 1-11) clearly suggests that under BLM's planning guidance, this is a serious omission. This issue should be resolved to assure compliance with Federal and State regulations. As noted above, destruction of cultural resources occurs often as a result of illegal vandalism, usually associated with oil and gas development and exploration, grazing management practices, and ORV and recreational activities. The impact of management practices for these programs on cultural resource values is clearly significant MSA, (pages 4331-9 and 4331-10). The MSA (p. 411-46) stated that "The opportunity exists to evaluate cumulative impacts of geophysical activities on the public lands. the RMP could be used to determine what areas, if any, would suffer unnecessary and undue environmental degradation if geophysical activities occurred." It does not appear that the BLM took advantage of this opportunity.

We believe that failure to address cultural resources as an issue has effectively prevented development of a new alternative which recognizes the seriousness of criminal vandalism as a threat to the existence of the cultural resource data base. Such an alternative could increase cultural resources data base. Such an alternative could increase cultural resources protection by: (1)

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment page 4]

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. BLM believes the draft adequately addresses the agency's obligations to protect cultural resources.

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1); however, management of cultural resources was noted as a managment concern (draft page 1-6). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6). See also the response to comment 2, National Parks and Conservation Association, for a discussion of this topic.

BLM's general policy and procedures for managing cultural resources are discussed on draft page 2-6. The draft would establish cultural resource use zones under all alternatives which would provide for all recognized management uses of cultural resources (draft pages 2-6 and 3-60, figure 3-15, and table 3-9). Management under the different alternatives assessed was discussed on pages 2-19, 2-20, 2-31 through 2-39, 2-56, 2-60, and 2-69.

As noted in this comment, the different management prescriptions analyzed under the alternatives (draft table 2-7) result in different projected impacts (summarized in draft table 2-10); this is why NEPA requires a range of alternatives to be assessed in the EIS process.

BLM recognizes that vandalism and adverse impacts to cultural resources have occurred in the past and continue to occur despite mitigation efforts (see draft pages 3-60 and 4-16 and MSA page 4331-20). The preferred alternative is expected to improve BLM's management of cultural resources in that fewer adverse impacts would occur (see draft table 2-10, page 2-96 as revised, page 4-68, and appendix Y. BLM also recognizes that a residual amount of damage to cultural sites would occur under any alternative assessed in the draft (table 2-10).

BLM is also concerned with enforcement of laws protecting cultural resources. However, the RMP is a land-use management plan which provides for the allocation of multiple uses under law (draft page 1-10). The RMP does not plan for illegal resource uses, or provide an appropriate forum to resolve administrative concerns such as legal enforcement, funding and personnel needs (draft table I-2 and figure I-3).

BLM is confident that protection of cultural resources would be maximized under alternative D (draft page S-4).

limiting oil and gas exploration and development (No areas are closed to oil and gas leasing or geophysical activities under preferred alternative E (page 4-62). Extensive geophysical exploration--approximately 11,250 miles--is anticipated during the life of the plan.); (2) limiting areas for potential chaining; (Currently 241,960 acres are identified for "potential land treatment (chaining) in Preferred Alternative E (page 2-47). This includes large areas on Cedar Mesa and the Grand Gulch Plateau, both areas widely noted for their cultural resource values; (3) maximizing non-motorized as opposed to motorized recreation; (The only new special recreation management areas (SRMA's) proposed in Preferred Alternative E would provide "motorized" recreation opportunities. Three areas were identified, totaling nearly 150,000 acres (page 4-71). All three (Indian Creek, Beef Basin, and Pearson Canyon) were proposed as National Register Districts in Alternative D but NOT in Alternative E (pages 2-37 and 2-38. Many additional examples could be provided.

Evidence provided in the RMP/EIS suggests that, in fact, cultural resources might prove to be the "highest and best use" of these lands. On a national scale, cultural resource values are described as extremely high (page 3-60). In contrast, oil and gas values (in over half the resource area) are considered low to moderate (Figure 3-2). The increase in AUM's as a result of chaining is projected to be minimal (less than a 2 percent increase in Alternative E) (page 4-68). Recreational needs (although of a different type) can be satisfied by primitive or non-motorized opportunities (page 4-56) more compatible with cultural resource protection.

We feel the RMP/EIS should explore more fully opportunities to increase cultural resource protection through the land use planning process (certainly one of the most efficient of management strategies). In an area where the environment is extremely fragile, strategies which enhance cultural resource protection also serve to protect numerous other significant resource values as discussed in detail in the MSA (including vegetation, soils, habitat, primitive recreation, threatened and endangered species, watershed, etc.).

These opportunities are especially important in light of BLM's projected inability to provide for conservation use of cultural resources within a period of 10 years under current management programs (MSA, page 4331-19). We do not see a change of management emphasis reflected in Alternative E sufficient to arrest the current rate of resource deterioration. We feel this may be inconsistent with FLPMA mandates described in Chapter 1 of the RMP to observe the principles of multiple use and sustained yield, weigh long-term benefits to the public against short-term benefits, and prevent unnecessary or undue degradation of the lands.

We are concerned about the lack of analysis of cumulative and residual impacts on the cultural resource base itself. The attrition of this fragile, non-renewable and nationally unique cultural resource base at the rate of nearly 2,000 sites per year in Alternative E (page 4-69) is surely a cause for great alarm. At the close of the life of the plan, almost 30,000 sites will have been damaged so as to "lose a significant portion of their value for scientific use." These losses will occur "despite mitigation measures," which, we assume, will not be undertaken in most cases where damage is due to vandalism (Appendix Y). This must surely be considered a major loss of an important resource, which should be recognized and evaluated explicitly in the discussion of this alternative.

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RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment page 5]

BLM is confident that alternative D would increase cultural resource protection. This comment's suggestions are answered as follows.

1) All alternatives assessed in the draft proposed limits to oil and gas exploration and development. Alternative D assessed the effects on the affected environment, including cultural resources, if over half of SJRA were closed to oil and gas leasing. The preferred alternative assessed the effects if no surface occupancy was allowed on about 15 percent of SJRA, primarily in areas with significant cultural resource sites. BLM has no legal or regulatory means to close areas to geophysical operations.

2) Under draft alternative D, no chainings would be allowed.

3) Under draft alternative D, over half of SJRA would be closed to ORV use.

The draft provides for nominations of specific cultural resource properties to the National Register (draft table 2-2). However, it is not efficient for BLM to nominate individual cultural properties. Anyone, including the commentor, can nominate cultural sites to the National Register. BLM manages sites that are potentially eligible for listing in the same way as it manages sites that are listed on the National Register (draft page 2-6).

Based on other comments received, BLM has made changes in the proposed RMP and final EIS to increase protection of cultural resources (see revisions to draft chapter 2 and appendix A). BLM is confident that alternative D as presented in the draft provides the maximum protection of cultural resources permissible under existing laws, regulations, and policy. The environmental effects on other resource values under this stringent level of surface protection were not acceptable (draft chapter 4). Accordingly, the preferred alternative concentrates measures, beyond the minimum requirements of law, to protect cultural resources in areas where, as this comment states, pro- tection of cultural resource values respresents the highest and best use of public lands.

The draft analyzes the cumulative and residual effects of the alternatives analyzed on all facets of the human environment found to be affected (draft page 1-11). (See draft page 4-11, for example.) The loss of cultural resources under each alternative has been explicitly evaluated, as suggested in this comment (draft table 2-10 and chapter 4).

Much of our concern stems from the implications that management practices in the San Juan Area have an adjacent lands in Glen Canyon National Recreation Area. Cultural resource properties from both areas share several cultural, functional and temporal traits, and can be considered complementary in many ways. Sites on adjacent BLM lands (especially in the areas west of Blanding and Monticello and south of Canyonlands) can potentially provide critical information needed to evaluate and study sites in the resource area. Some of our most important sites lie in canyons which begin in the recreation area and end on BLM lands. BLM sites are even more important due to the loss of numerous sites along the Colorado River during the filling of Lake Powell.

As a recreation area, Glen Canyon shares many of the same resource management problems related to oil and gas development, and heavy recreational use. We have seen severe impacts to our cultural resources caused by illegal digging and vandalism, occurring almost exclusively in areas which have been opened to easy motorized transportation and heavy visitation. We are concerned that the management practices described in Alternative E will lead to increased impacts to and degradation of park resources, in several areas which are now relatively unused and untouched. For these reasons, we urge you to reconsider the basic allocation decisions contained in Altertnative E, and revise those actions in a manner which will reflect greater consistently with our concern for cultural resource protection.

The RMP/EIS also does not address impacts on the various units of Hovenweep National Monument. We believe it should, given the mandate of the above-mentioned 1978 amendment to the NPS organic act and the surrounding public lands adjoining the monument. As noted above, activities such as grazing and mineral development are incompatible with the trust obligation for protection of natural and cultural resources.

The RMP/EIS should point out the effects of the existing (since 1975 three-party agreement among the NPS, the BLM, and a permittee which allows grazing on 80 acres of land within Hovenweep National Monument's Square Tower unit. This grazing authorization has not been exercised at all since 1978, and has been used only five times since 1962 when this parcel was transferred to the National Park Service. The RMP/EIS does not address this grazing authorization in the text, nor is it dealt with in Table I-5 (Management of Grazing and Recreation Resources) in which BLM grazing in Glen Canyon NRA is mentioned. Figure 3-14 (Grazing Allotments) also does not address the issue. The matter also is not mentioned in the estimation of effects, which requires the identification of management action impacts upon adjacent Federal lands. Since the grazing authorization in question has not been used in eight years, and since the permittee has changed through the sale of this grazing priviledge, as well as the allotment (from sheep to cattle), this authorization should be discontinued, if it has not already been done so in the San Juan RMP. Grazing is not a compatible land use with cultural resources management values in a national monument. Degradation of surface feature of archeological sites as well as the destruction of vegetation and cryptogamic soils will occur if grazing were to resume. We also question the practice of selling grazing rights in a national park unit, particularly without first consulting with the National Park Service.

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment page 6]

NPS conducted an archaeologic survey of Glen Canyon prior to the filling of Lake Powell; it would not be appropriate for BLM to include in the RMP a discussion of cultural resource information extracted from these sites, or a comparison between the information contained in these sites and the potential for information in undiscovered sites on public lands.

Impacts on federal lands in Glen Canyon NRA, where projected to occur, were discussed in the draft. The impact analysis did not show that the area adjacent to Glen Canyon NRA would be subject to "severe" impacts to cultural resources under any alternative; under the preferred alternative, the special conditions developed to protect P and SPNM ROS classes adjacent to Glen Canyon NRA would also serve to protect any cultural resources present from surface disturbance.

The draft discussed impacts to adjacent lands where projected to occur; use of Hovenweep NM is not expected to change as a result of management prescriptions presented under any alternative assessed in the draft. The "trust obligation" mentioned in this comment is that which Congress places with NPS to manage federal lands entrusted to its administration. Congress did not direct BLM to administer grazing and minerals uses on public lands to meet the NPS mission.

As requested, the text of the draft has been revised to reflect the current situation regarding grazing management in Hovenweep NM; a 100-acre parcel of the NM is subject to grazing use (see revisions to draft table I-5, page 2-6, table 2-7, figure 3-14, and page 5-9). Grazing privileges in an NPS unit, including that of transferring ownership of a grazing permit, are handled under the same policies and regulations as grazing privileges on public land; NPS agreed to BLM's management program under the 1975 agreement signed by NPS, referenced in this comment.

When Hovenweep NM was established, Congress did not exclude grazing uses. Congressionally authorized uses are widely thought to be appropriate; the RMP cannot make changes in law or policy (draft pages 1-10 and 2-1). Grazing use in the NM is authorized for a total of 48 hours per year and, as pointed out in this comment, this privilege has not been exercised in recent years. This level of use within the NM has not been identified as a problem or as causing conflicts with other resource values. The grazing allotment involved (Cross Canyon) would have an AMP prepared under the preferred alternative (draft table AU-1). The AMP is an activity plan and would be prepared with NEPA documentation; resource conflicts, if any, could be addressed at that level. The impacts of specific grazing projects on cultural resources would be analyzed at the project level, not in the RMP/EIS (draft pages 2-1, A-1, and A-29).

Geophysical exploration and development on lands adjoining Hovenweep also pose potential damage to the monument's archeological and natural resources. In addition, they intrude upon the visitor's experience of the monument's solitude and create an incongruous setting where modern technological developments conflict with the prehistoric cultural setting.

Such were the experiences of monument staff and visitors with two nearby well drilling operations in 1985 and several other exploration projects during the past four years. Furthermore, potential mining operations on public lands within 100 yards west of Hovenweep Castle and Square Tower ruins would completely change the character of the monument for visitors. In addition, there remains the overriding question of what effects such potential ground distrubuting activities would have on the Anasazi ruins. It must be remembered that every time a change is imposed on the land and the resources, the change becomes permanent, and over the years, the cumulative effects of such changes can result in a loss of those attributes for which the park unit was set aside to protect.

The RMP/EIS should recognize that the Environmental Assessment prepared by the NPS for the Hovenweep General Management Plan has identified a general area around some of the monument's units, including the Square Tower unit, which contains archeological sits that predate the well known Hovenweep tower complexes. The exact nature of the interrelationship between these sites is unknown, but the older villages are seen as an integral part of the cultural sequence leading to the rise of the Hovenweep town sites.

However, we are alarmed at the possibility of losing the archeological record in the area surrounding Hovenweep, particularly in light of the passage on page 3-60 which reads, "Since 1982, the most common (surface disturbing activities) have been oil and gas exploration and development, pot hunting, and recreation use. Exploration and development for other types of minerals, grazing and related land treatments, and lands disposal actions also carry the potential to interfere with protection of cultural resources. Indirect impacts to cultural resources, such as surface collection of artifacts or inadvertent damage caused by rehabilitation work, can have a profound cumulative adverse effect."

Indeed, the RMP/EIS states on page 4-16, ". . . Given the current rate of disturbance, certain aspects of the surface or subsurface cultural resource could be lost by 2000." The RMP/EIS should discuss what information would be lost and what effects this would have on the ability to fully understand the Hovenweep story. It thus seems all the more important at least to preserve a discreet example of this prehistory. Specifically, that aspect of Alternative D that establishes the 2,000-acre Hovenweep ACEC should be included in whichever alternative is selected by the BLM. Many of the potential problems that we foresee for the area around Hovenweep would be solved or mitigated by an ACEC designation, i.e., no surface occupancy, management as Visual Resource Management (VRM) Class 1, plan of operation requirement for mining and annual assessment work, motorized access restriction to designated roads and trails, and some grazing restrictions. In addition, we prefer withdrawal of mineral entry as mining claims lapse. And although there is a no-surface occupancy designation, effective since

[Comment page 7]

BLM knows of no studies showing that geophysical operations or other minerals exploration measures in the vicinity of Hovenweep NM have caused damage to natural resources in the NM, or would lessen the visitor's appreciation of the cultural resources present in the NM. Hovenweep was not designated as an NM to protect scenic values or to afford an experience of solitude, as discussed in this comment, but rather because of the archaeologic sites present. BLM takes measures to protect cultural resources on public lands (draft appendix A), including those near Hovenweep NM, but acknowledges that unauthorized damage does occasionally occur.

The draft recognizes the NPS EA regarding protection of lands surrounding Hovenweep NM (draft page 5-6). BLM also is alarmed about the possibility of losing the archaeological record on public lands adjacent to the NM. BLM will continue to perform inventory, evaluation, and either avoidance or data recovery efforts to protect cultural values in this area.

The area addressed in the NPS EA has been included in the proposed RMP as a proposed ACEC, in response to negotiations between BLM and NPS (see the revisions to draft chapter 5). The area proposed is that which NPS requested, 1,500 acres (slightly different from the 2,000 acres shown as a potential ACEC in draft alternative D). (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.) The agreement covers lands managed under the San Juan/San Miguel RMP as well, and will act to ensure consistency across the state line. The proposed ACEC would be designated to protect cultural values, but the area was not found to meet BLM manual criteria for consideration as a potential ACEC for scenic values (see the response to comment 2, National Parks and Conservation Association, comment page 21, on this topic).

Impacts to cultural sites were projected in the draft using the methods given in appendix Y. The numbers of sites were projected based on acres of surface disturbance projected to occur. As stated in the draft, no attempt was made to determine which specific sites would be impacted, or the potential scientific significance that would be lost (draft page A-195).

A special designation such as an ACEC does not guarantee any particular level of management. This comment apparently assumes that ACEC designation would cause the area to be managed as VRM class I and require no surface occupancy; the management prescriptions for the proposed Hovenweep ACEC (proposed RMP and final EIS appendix I) are those BLM and NPS agreed to, and do not reflect the assumptions of this comment.

1975, for 880 acres surrounding the Square Tower unit, those cultural resources on the remaining public lands in the area are subject to the damages that the RMP identifies as resulting from multiple use management. Further, our uneasiness over the possible fate of the archeological resources in the Square Tower area are not allayed by conflicting information in the RMP's graphics. For example, Figure S-4, "Generalized Land Use Management Plan," Alternative E on page S-11, shows 400 acres at Square Tower with a no-surface occupancy designation, while Figure 3-1, "Oil and Gas Leasing Categories," page 3-5, shows 880 acres falling under this category of land use.

Further, we believe there should be consistency between adjoining Resource Management Areas on how the public lands are managed. For example, the San Juan/San Miguel RMP designates a 156,000-acre Anasazi Culture Multiple Use Area ACEC. This ACEC's western boundary is the Utah State line. We believe the RMP/EIS should address how this ACEC relates to management of the public lands discussed, including why such designation should not be carried into Utah. Such discussion should also include its relationship to the consistent management of public lands surrounding Hovenweep National Monument, which has units in both Colorado and Utah.

Our review of this document indicates that inventories of resources in the San Juan Resource Area are incomplete, particularly in terms of endangered and threatened species, cultural resources, unique or relict plant communities, and wildlife (predators). This is not an unusual situation, especially considering the limited funding and personnel with which the Area operates. We strongly support additional inventory and monitoring of resources and management actions to assure that irreplaceable resources are not lost due to lack of information. As required by NEPA, prior to approving any action which might cause irreversible damage, an on-site inventory and assessment of natural, cultural, and recreational resources should be conducted to avoid loss of unique resources. For example, the San Juan Resource Area appears to include all or parts of three river segments listed in the Nationwide Rivers Inventory (NRI). These are:

1. The Colorado River from the San Juan/Grand County Line to the southern boundary of Canyonlands National Park is listed for its outstandingly remarkable scenic, recreational, geologic, fish and wildlife values;

2. The San Juan River from Lake Powell to U.S. Highway 160 is listed for its outstandingly remarkable scenic, recreational and geologic values; and

3. White Canyon from Lake Powell to source which is listed for its outstandingly remarkable scenic and geologic values.

The President issued a Directive on August 2, 1979, which requires that:

> "Each Federal Agency shall, as part of its normal planning and environmental review process, take care to avoid or mitigate adverse effects on rivers identified in the Nationwide Inventory prepared by the Heritage Conservation and Recreation Service in the Department of the Interior.

[Comment page 8]

Figure S-4 should have shown the same 880-acre tract as in figure 3-1 as a no-surface-occupancy area adjacent to Hovenweep NM (see revisions to draft, figure S-4). This comment is correct in stating that, under the current situation, 880 acres adjacent to Hovenweep NM have a no-surface-occupancy stipulation for oil and gas leases (but not for any other type of land use).

The RMP team was aware of the Anasazi Cultural Multiple Use ACEC in southwestern Colorado in the Montrose District, and of the management stipulations imposed by the San Juan/San Miguel RMP (see draft page 5-7). When preparing the MSA, the RMP team assessed SJRA for any areas with preliminary potential for ACEC desgination (MSA, part II, each section); although examined, the area adjacent to the Multiple Use ACEC in Colorado was not identified as potentially meeting ACEC criteria (discussed above). Additionally, the area was not nominated by any other agency or the public for consideration as an ACEC. A comparison of the management actions allowed in the Multiple Use ACEC under the San Juan/San Miguel RMP and the preferred alternative of this draft does not necessarily show that southwestern Colorado has a more stringent level of management, or that the draft is inconsistent with its sister plan, as stated in this comment.

BLM acknowledges that inventories of natural resource data are incomplete. This is discussed in part II of the MSA for each resource program analyzed. The need to provide ongoing data collection is not a planning decision per se because it does not require a land-use allocation. As such, it does not have to be spelled out in the RMP. However, BLM recognizes the need to update the data base used for the RMP, through agency initiated inventories or other means. Natural resource inventory is a continuous process. As more information becomes available, it will be incorporated into the RMP, and planning decisions will be changed as necessary (draft appendix B).

The RMP recognizes the need for site-specific NEPA documentation for projects proposed or implemented under the RMP (draft pages 2-1, A-1, and A-29).

BLM appreciates this commentor's bringing the NRI requirements to its attention. The text of the draft has been changed to include all three river segments (see revisions to draft page 2-7 and appendix DD); the draft included mention of only the San Juan (draft table I-2). The draft has been revised, and the eligibility and potential classification of all three segments have been discussed. All three segments will require suitability studies to be prepared jointly with other federal and state agencies. The suitability studies will be prepared after completion of this final EIS. U.S. Highway 160 was renumbered in the 1970s; at Mexican Hat it is now U.S. 163.

Agencies shall as part of their normal environmental review process consult with the Heritage Conservation and Recreation Service prior to taking actions which could effectively foreclose wild, scenic, or recreational river status on rivers in the Inventory."

On June 1, 1981, the NPS absorbed what were previously Heritage Conservation and Recreation Service responsibilities with regard to NRI streams. Federal Agency procedures to avoid or mitigate adverse effects on NRI streams were published in the Federal Register on September 8, 1980 (copy enclosed).

The following four steps are required by Agencies to comply with the Presidents Directive:

1. Determine whether the proposed action could affect an Inventory river;

2. Determine whether the proposed action could have an adverse effect on the natural, cultural and recreational values of the Inventory river segment;

3. Determine whether the proposed action could foreclose options to classify any portion of the Inventory segment as wild, scenic or recreational river areas, and

4. Incorporate avoidance/mitigation measures into the proposed action to maximum extent feasible within the Agency's authority.

In our review of the subject draft; we could find no evidence that the above procedures were followed and suggest that they be given consideration in its revision.

Questions on NRI streams and related procedures may be referred to Duane A. Holmes at 303-236-8705 or FTS-776-8705.

As far as mineral exploration and development is concerned, Alternative D would offer the most protection to National Park System units affected by this plan and is therefore the most Preferred Alternative for the National Park Service. However, Alternative D has been developed as the "extreme" alternative for land protection and therefore would have a small likelihood of being implemented.

We therefore support Alternative E, BLM's preferred alternative, with the following changes. The generalized land use management zoning of Alternative E poses significant threats to lands surrounding Canyonlands National Park and adjacent to Glen Canyon National Recreation Area and Natural Bridges National Monument. The areas highlighted in yellow on the enclosed map are currently proposed for standard surface use and are therefore open to mineral development without surface use restrictions. We recognize that a portion of the area of concern adjacent to Glen Canyon NRA is closed to oil and gas leasing or open with no surface occupancy restrictions or, minimally, under limited surface use restrictions.

[Comment page 9]

The San Juan and White Canyon segments fall within areas that would be designated as SRMAs under the proposed RMP (draft figure 2-11); activity plans will be prepared for these areas (draft table 2-7) which will determine whether recreation-related activities could adversely affect the values of the river segments. Along the Colorado River, SJRA administers only about 14 miles of the river canyon above Canyonlands NP, and does not administer use of the river. Projects proposed for these areas would be assesed through the NEPA process on a case-by-case basis. The proposed RMP would provide broad-scale planning decisions for management of riparian areas, the Scenic Highway Corridor proposed ACEC (which contains part of the White Canyon drainage), and the San Juan River SRMA (see revisions to draft appendix A).

BLM appreciates the comments regarding mineral exploration and development under draft alternative D, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

BLM appreciates the support for the preferred alternative, and understands this comment's concern regarding "standard surface use." However, the areas with this type of management prescription adjacent to Glen Canyon NRA include only the mile-wide corridors along existing roads, and the areas adjacent to Canyonlands NP are those with existing surface disturbance. "Standard surface use" is different from "without surface restrictions" (draft appendix A).

Further, the MSA (pp. 4331-20 and 4111-36) identified those BLM staffing shortages that exist, and stated "This threshold (for the amount of geophysical activity that can be managed to prevent damage to other resource values) has been crossed 85 percent of the time in the past three years." We suggest the RMP/EIS discuss the effect this staffing shortage would have on the cultural resources within the 200-acre zone near Hovenweep National Monument where several miles of geophysical exploratory lines have been run during the past few years, and whether this situation would continue.

SPECIFIC COMMENTS

Page I-7. Under Resource Management Program section #4331, National Natural Landmarks (NNL's) are identified for special management. Yet no mention of the 5 proposed NNLs located within the boundaries of the San Juan Resource Area could be found in the document.

We suggest that coordinated efforts be considered with these areas since multiple ownership is involved (i.e., BLM, BIA, NPS, and the State of Utah).

The proposed sites including ownership are as follows:

NNLs	OWNERSHIP
-Rainbow Plateau	BIA, NPS
-Navajo Mountain	BIA
-San Juan River (including Grand Gulch, Slickhorn Gulch and John's Canyon)	BIA, BLM, NPS, State
-Monument Valley	BIA
-Goosenecks of the San Juan	BIA, NPS, State

Site specific information and material on the NNL program may be obtained from C. A. Madison (RMR-PL), National Park Service, Rocky Mountain Region, P.O. Box 25287, Denver, Colorado 80225, telephone number is 303-236-8699 or FTS 776-8699.

Page I-10. Under The Resource Area, second paragraph, the third sentence should state ". . . some NPS administered land . . ." Otherwise one could erroneously assume from this language that grazing and mineral activities are permitted on all NPS lands which is not the case.

Page I-17. The total acreage under Federal ownership in Canyonlands National Park is 337,570.43, not 247,998.47 as listed. If the smaller figure is meant to represent only the NPS acreage within the San Juan Resource Area, a note to that effect would remove any confusion in the minds of readers.

Page I-18. The table shows 5,705.98 acres of state minerals in Canyonlands National Park. There are no longer any state minerals in the park.

Page 1-1. We suggest that BLM give priority, for planning purposes, to a criterion that would support the designation of ACECs or ONA's in areas adjacent to NPS managed lands.

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment page 10]

The RMP is a land-use allocation plan, not intended to discuss staffing needs. It is assumed that staffing and funding will be adequate to implement any plan adopted by the State Director (draft page 1-2).

Specific Comments

Page I-7. BLM sees no need to mention proposed National Natural Landmarks (NNLs) on federal lands managed by other agencies. BLM would have no management responsibility or interest in these areas, and the RMP would not serve to allocate any surface use of these areas. BLM was not aware that an NNL had been proposed for public lands along the San Juan River. When BLM receives a specific management proposal, this agency will review it against the land-use plan; a plan change may be required (draft appendix B). However, BLM believes that under the proposed RMP the San Juan River SRMA recognizes and protects significant surface resource values on public lands within the river corridor.

Page I-10. The text has been revised where suggested in this comment (see revisions to draft, page I-10).

Page I-17. All acreages in the entire RMP/EIS refer to relevant parcels within the boundaries of SJRA as shown on figure I-4.

Page I-18. Acreages in table I-4 are according to master title plats (MTPs) (draft page I-20). The MTPs are the official records for surface and mineral ownership. Although some BLM maps show that there are no state minerals within Canyonlands NP, the MTPs show these areas as having state minerals. Until NPS processes the mineral deeds through BLM (at which time the MTPs would be revised), the official ownership will continue to show state minerals within the NP.

Page 1-1. The planning criteria went through a formal public participation process (see page 5-9 of the draft) and incorporate the concerns raised by interested parties, including NPS. (See also the response to comment 2, National Parks and Conservation Association, comment page 7, on this topic.)

To qualify for consideration as a potential ACEC, an area must meet the criteria of relevance and importance.

Page 1-2. We suggest that the South Needles WSA (UT-060-169A) can qualify as a WSA under FLPMA. Even though this area is less than 5,000 acres, we believe the adjoining Canyonlands National Park recommended wilderness qualifies the South Needles as a WSA.

Page 1-4. Table 1-1 - The Indian Creek WSA is adjacent to the Needles proposed wilderness, not the Maze proposed wilderness.

Page 1-6. As outlined above, we believe cultural resource management should be an issue, much the same as livestock, wilderness and wildlife are also governed by law and remain issues. Alternatives should provide for cultural resource management above the minimum levels established by law and regulation. There are many actions the BLM can take for cultural resources protection which are not required by law but which may be very appropriate to increase protection efforts. Some of these actions might include ruins stabilization programs; not only protecting cultural resource sites but their setting as well; public interpretation and increased public awareness programs.

Also on Page 1-6, under Glen Canyon National Recreation Area, the text should be replaced by the following to clearly inform the public of BLM's role:

> "The San Juan Resource Area has certain administrative responsiblities for grazing and minerals within Glen Canyon National Recreation Area (NRA). The Resource consumptive uses that are authorized within Glen Canyon are mandated by the enabling legislation to be subordinate to the preservation of scenic, scientific, and historic resources and and the public use and enjoyment of the NRA. THerefore Bureau of Land Management (BLM) practices, objectives and planned actions that are applied elsewhere on the public lands in the San Juan Resource Area may not be applicable or permissable within the boundaries of Glen Canyon National Recreation Area."
>
> "Coordination of grazing responsibilities between the Bureau of Land Management and the National Park Service (NPS) in regards to Glen Canyon National Recreation Area were addressed in the Umbrella Memorandum of Agreement for Grazing signed by the Directors of the National Park Service and Bureau of Land Management, as well as the Interagency Agreement for Grazing Management on Glen Canyon National Recreation Area signed by the NPS Rocky Mountain Regional Director and the BLM Utah State Director. Management of minerals falls under specific laws and regulations and is beyond the discretion of BLM field office personnel."
>
> "Wildlife, vegetation, cultural resources and recreation management on NRA lands is within the primary authority of the NPS and addressed in their Natural Resource Management Plan, Cultural Resource Management Plan, General Management Plan and other appropriate planning documents."

[Comment page 11]

Page 1-2. The South Needles WSA was established through a Federal Register notice (51 FR 2768, January 21, 1986, effective February 20, 1986). While BLM appreciates support for this designation, the draft was not intended to solicit comments on WSA designations.

Page 1-4, Table 1-1. The map entitled "Wilderness Plan, Canyonlands National Park, Utah", dated January 1978, provided to BLM by Canyonlands NP, shows the Indian Creek WSA to be adjacent to the Maze proposed wilderness, not the Needles proposed wilderness as stated in this comment. BLM understands that the NPS 1984 wilderness proposal refers to this area as the Maze-Grabbens proposed wilderness. BLM understands that this information is still current.

Page 1-6. Cultural resource management does not qualify as a planning issue (see the response to comment 2, National Parks and Conservation Association). Wilderness management is not a planning issue (draft page 1-2).

BLM has revised the text regarding management of Glen Canyon NRA, in accordance with this comment's suggestions (see revisions to draft page 1-6 and 5-6).

Page 1-7. We strongly support the addition of units 9 and 10, 16, 11 and 12, as additional wilderness areas. Each spring and fall, large numbers of people come to Natural Bridges National Monument, seeking information about hiking and camping on adjoining BLM lands listed in the above units. There have been several national magazine articles published in the last year about these lands. Backed by the interest we have seen by the visiting public, there is a large segment of the public who want a wilderness experience on these lands.

Page 2-2. The RMP/EIS states that the San Juan Resource Area would administer the operational aspects of any geothermal leases issued in Glen Canyon. As identified in the Mineral Leasing Act of February 25, 1920, as amended (30 U.S.C. 181 et. seq.), the Acquired Lands Mineral Leasing Act of August 7, 1947, as amended (30 U.S.C. 351 et. seq.) and the Combined Hydrocarbon Leasing Act of November 16, 1981 (30 U.S.C. 181 et. seq.), resources not available for leasing in any National Park Service unit include geothermal resources, coal, oil shale and mineral materials. The leasing of geothermal resources in national recreation areas is specifically prohibited in 30 U.S.C. 1014(c). The statute says, "Geothermal leases. . . shall not be issued for lands administered in accordance with (1) sections 1 and 2 to 4 of title 16, as amended or supplemented (NPS Organic Act), (2) for lands within a national recreation area . . ." The paragraph on page 2-2 of the Plan is therefore erroneous and should be removed. There is also a reference in this paragraph to see chapter 5. This reference, therefore, should be removed. On page 5-5, under National Park Service, there should be a statement to the effect that geothermal resources, coal, oil shale and mineral materials are not available for leasing in any National Park System unit.

A second mineral issue which should be expressed in the section dealing with the administration of oil and gas exploration concerns off lease seismic exploration which is not authorized on Glen Canyon National Recreation Area.

Page 2-6. The document should also state that grazing management on lands within Glen Canyon National Recreation Area also takes place within the terms of a BLM-NPS Memorandum of Understanding.

Page 2-7. There appears to be a contradiction in the Statement that areas may be closed to ORV use, but that ORV use may be allowed under permit. To remove this contradiction the conditions resulting in issuing and ORV permit in a closed area should be specified, or, no ORV use should be allowed in closed areas.

Page 2-10. (2) Expansion of Canyonlands National Park. The 1985 proposal to expand the park boundaries in Davis and Lavender Canyons was considered as an amendment to a Utah wilderness bill introduced in Congress. This movement was not an informal public proposal.

Page 2-16-17. The very brief description provided under cultural resources should recognize the resource protection zone in the Hovenweep National Monument General Management Plan and include flexibility to accommodate necessary management in this zone. Such management should be much more than an oil and gas no surface occupancy stipulation.

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Page 1-7. The RMP/EIS does not assess the suitability of WSAs for wilderness designation. That analysis has been left to the statewide wilderness EIS (draft page 1-2).

Page 2-2. The text of the draft has been revised to indicate that geothermal leasing is prohibited within the NRA (see revisions to draft page 2-2). The paragraph questioned in this comment has not been removed because USGS has mapped the prospectively valuable lands on the NRA, whether they are leased or not.

The section of draft chapter 5 cited in this comment discusses aspects of NRA management that pertain to BLM, and is not intended to be a comprehensive listing of resources on NPS units managed by NPS. Similarly, since geophysical operations on the NRA are not authorized by BLM under the mineral leasing act, and since NPS is the surface administrator of the NRA, a discussion of seismic exploration prohibitions on the NRA is irrelevant to this RMP.

Page 2-6. The text of the draft has been changed as suggested in this comment (see revisions to draft page 2-6).

Page 2-7. ORV use is administered in accordance with 43 CFR 8340; the regulations provide for vehicular use in limited or closed areas under certain conditions. These conditions are explained in draft appendix E (draft page A-49). The RMP cannot be used to alter regulations (draft pages 1-10 and 2-1).

Page 2-10. BLM understands that, as of the time the final was prepared, no formal legislative proposal to expand the boundaries of Canyonlands NP was ever introduced as a Congressional bill, although it was discussed. In 1985 a Congressman informally proposed expanding the boundaries of Canyonlands NP as a trade-off for dropping the area from further consideration as a potential site for a national nuclear waste repository, and this idea was widely discussed in news media at the time. However, the site was not selected, and this proposal became a moot issue. The text of the draft has not been changed because the proposal was (1) informal (never carried beyond committee discussions) and (2) public (not originating within either agency involved).

Page 2-16, 2-17. These pages of the draft do not discuss either Hovenweep NM or cultural resource management; BLM is uncertain as to the intent of this comment. The resource protection zone proposed by NPS surrounding Hovenweep NM was discussed on draft page 5-6. BLM and NPS have agreed that the proposed RMP will propose a Hovenweep ACEC to coincide with the NPS resource protection zone, with management prescriptions conforming to the 1937 cooperative management strategy (see revisions to draft chapter 5 and appendixes H and I).

Page 2-17. Figure 2-1 - All lands in T36S-R18E, T37S-R17E and T37S-R18E should be included in the Alternative D classification. These are the lands surrounding Natural Bridges National Monument and are part of the viewed landscape by all visitors to the monument.

Page 2-31. Figure 2-7-11 - Lands in T36S-R17E, T36S-R18E, T37S-R17E and T37S-R18E should all be classified as potential National Register properties. There is a great abundance of cultural resource sites in T36S-R18E and T37S-R18E that are comparable to the sites within Natural Bridges National Monument. The sites in these two townships are part of the White Canyon system and are accessible to visitors to the monument. They also represent the same cultural group and were occupied at the same time as those sites with the monument be designated as a national archeological district.

Pages 2-42-47. Figures 2-12 through 2-15 - All alternatives show potential land treatments in the vicinity of Natural Bridges National Monument. Highway 95 is a scenic route used to connect several tourist attractions together in Southern Utah. Land treatments involving chainings or other manipulations of the native vegetation negate the scenic quality of this road. See also comments on VRM classes on Page 3-83.

The entire area is rich in archeological resources. These long term cultural resources will suffer in the short-term land treatments. Land treatments anywhere in this archeologically rich and scenic area are not in the best interests of citizens visiting Natural Bridges National Monument, of the National Park Service, or of scientists investigating our cultural heritage.

All land treatment alternatives show in T36S-R18E that lands along the approach road (U-275) to Natural Bridges National Monument will be manipulated. The NPS would oppose all such efforts. The BLM granted the NPS the right-of-way along this entrance road to preserve the scenic values of the area as a person approach the monument. With land treatments occurring outside the right-of-way, there would be an obvious green corridor of little scenic value. This area is rich in archeological sites and should not be disturbed.

Page 2-49. Table 2-3 - The NPS strongly supports inclusion of the additional Special Recreation Management Areas.

Page 2-51. Comparing the costs by alternative is difficult because information is scattered throughout the RMP. The BLM, on page S-13, states that Alternatives C & D would be expensive to implement while the Preferred Alternative E would cost only slightly more to implement than the No Action Alternative A. One is led to believe part of the reason Alternative E is preferred is because of a lower cost. However, some of the figures are suspect. For instance, Alternatives C & D have 50 percent and 100 percent less land treatments than does Alternative E. The range improvement and grazing costs for C & D are considerably higher than they are for Alternative E. This is just the opposite of what one would expect. Alternative E, with more than two times the range improvements, should cost more. A more thorough and clear justification of costs is needed.

Page 2-74. The important cultural resources in Beef Basin should be recognized by limiting ORV use to existing roads.

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Page 2-17, Figure 2-1. The criteria for the natural succession areas shown in figure 2-1 are given on draft page 2-15. Viewsheds from NPS units were not part of the criteria used.

Page 2-31, Figures 2-7 through 2-11. Figures 2-7 and 2-8 show existing National Register sites, not potential sites. Figures 2-9 through 2-11 include the potential National Register properties listed in table 2-2.

In the draft alternatives, BLM did not attempt to list all significant cultural resource sites, or to show probable locations of undiscovered sites that may qualify for listing on the National Register (draft page 3-8, figure 3-15, and table 3-8). Proximity to an NPS unit is not a criterion for listing on the National Register. SJRA has an abundance of cultural resource sites; although significant sites exist in the areas mentioned in this comment, BLM finds other areas to be more deserving of recognition.

Page 2-42 through 47, Figures 2-12 through 2-15. Potential land treatments shown are the areas that are physically suitable for this type of use. The draft is revised to clarify this, and to indicate that priority would be given to maintaining existing land treatments (see revisions to draft pages 2-6 and 2-68). (See also the response to comment 2, National Parks and Conservation Association, comment page 34.) The method of treatment would be determined when a project was actually proposed. NEPA documentation at that time would assess impacts to other resources (draft pages 2-1, A-1, and A-29). Under the proposed RMP, in the vicinity of Natural Bridges NM, the special conditions for the Scenic Highway Corridor proposed ACEC would have to be met.

Although on a philosophical level NPS may feel that land treatments are not compatible with that agency's mission, grazing use of public lands (including land treatments) is a traditionally authorized use, and will be allowed to continue within the parameters of BLM's multiple-use mandate.

Page 2-49, Table 2-3. BLM appreciates this support for the proposed SRMAs.

Page 2-51. BLM repeated budget cost information at various locations in the draft; for example, it is summarized in the Summary, compared in the discussion of alternatives (draft table 2-4, page 2-51), and explained in detail in draft appendix K. Budget figures for range improvements were in error and have been revised (see revisions to draft table 2-4 and appendix K). Alternative D would be only slightly more expensive to implement than alternative A, and alternative B would be the most expensive to implement. See the response to comment 9, Southern Utah Wilderness Alliance, comment page 4, for a complete discussion of this topic.

Page 2-74. See the response to comment 2, National Parks and Conservation Association, comment page 34, on this topic.

Page 2-76. Table 2-9 - Livestock exclusions for Alternative C should include Grand Gulch, Dark Canyon and Upper Indian Creek.

Page 2-81. The special designations for the South Needles WSA do not include belonging to the Beef Basin Archeological District under Alternatives A, B and E. The importance of the area either exists or does not exist, and should be consistent among alternatives. The archeological importance is a fact and should be recognized in all alternatives.

Alternatives A and B should also be closed to ORV use for the same reason.

Page 2-87. The RMP/EIS should state whether Bridger Jack Mesa and Lavender Mesa are the only two locations with relict plant communities. Such identification is necessary for a full understanding of the full impacts of protecting or not protecting such areas.

There is no mention of the impacts to viewsheds from the National Park System areas under the category of Forest Products Harvest. This should be included so the public can understand the full impacts of forest product harvests. The NPS feels the BLM should recognize the views from the parks as critical environmental areas and important resources for the American people visiting this area.

Page 2-88. The RMP/EIS should present wildlife population goals for Alternatives A, D and E. This is an important natural and economic resource that should have top consideration.

Page 2-91. Off road vehicle use is listed throughout the plan as being limited to roads and trails in areas allowing such use. There may be a need to close certain trails to off road vehicle use. Trails should be considered on a case by case basis.

Page 2-95. Under Alternative E, the number of deer will increase by 643 animals to 8,000. The acres of critical deer habitat will decrease by 4,120 acres to 187,800. The number of bighorn sheep will increase by 200 animals while the crucial habitat decreases by 1,000 acres. There needs to be an explanation of how there will be more animals on fewer acres of habitat.

Neither in this summary table, nor in the text, are predators such as mountain lions, bobcats, coyotes, or bears considered or discussed. The NPS aims to manage the natural systems within park boundaries in a fashion undisturbed by humans. The San Juan Resource Management Plan should provide more baseline data on these species and consider for protection the habitat of those animals which are part of the Canyonlands National Park and Natural Bridges National Monument ecosystems.

Page 2-96. Table 2-10, "Summary Comparison of Impacts, by Alternative", lists the archeological/historic sites that will be protected or damaged under each of the BLM's proposed five alternatives. The totals for these cultural resource sites range from 41,444 under Alternative A, to 57,970 under Alternative C, a difference of some 16,826 sits. This discrepancy in figures is puzzling since it would seem logical for the total number of

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Page 2-76, Table 2-9. Under alternative C, livestock would be excluded from riparian areas, including the drainages mentioned in this comment. Grand Gulch and Dark Canyon fall within P ROS class areas, where livestock use would be reduced (appendix A).

Page 2-81, Table 2-9. Special designations in this table reflect those in tables 2-2, 2-3 and 2-6. Not designating an area as a National Register Archaeologic District does not indicate lack of concern for cultural resources. The areas listed in table 2-2 are the highest priorities.

Alternative A represents the existing situation. Because there are currently no ORV closures in SJRA, table 2-9 should not be revised to show closures. The closures suggested would be inconsistent with the objectives for alternative B.

Page 2-87, Table 2-9. The draft (page 3-37) states that some isolated mesa tops scattered throughout SJRA could be considered relict plant communities. Bridger Jack and Lavender Mesas are believed to have the greatest study value.

Harvest of forest products at the level assessed in the RMP is not believed to impact the viewshed of NPS units. Draft chapter 2 presents alternatives, not impacts (except for the summary in table 2-10). Chapter 4 discusses impacts to NPS units where found to occur.

Page 2-88, Table 2-9. Alternative A is the existing situation, and no wildlife population goals now exist. Wildife population goals have been added for alternatives D and E. (See also the response to comment 27, Fish and Wildlife Service, on this topic.)

Page 2-91, Table 2-9. Under the RMP (draft appendix E), areas may be designated as open, limited, or closed to ORV use. The draft applied the least restrictive level of management needed to resolve resource conflicts documented in the RMP/EIS (see also the response to comment 2, National Parks and Conservation Association, on this topic). BLM's authority to close roads or trails is legally limited; closures would have to be evaluated individually.

Page 2-95, Table 2-10. This table is a summary of projected impacts. Draft chapter 4 contains the full discussion of anticipated impacts. The text has been changed to indicate that BLM would manage for a diversity of habitat (see revisions to draft table 2-5). (page 3-41) SJRA contains many wildlife species, but management is concentrated on certain habitatd (see the response to comment 22, Environmental Protection Agency, comment page 4,). The RMP is not intended to provide baseline studies for natural resources, but to allocate resource uses. See also the response to comment 27, Fish and Wildlife Service, on this topic.

Page 2-96, Table 2-10. Table 2-10 summarizes chapter 4. The impact analysis (chapter 4) and appendix Y explain why the number of cultural resource sites protected or damaged would vary among alternatives.

cultural resources lying on a given land area would remain constant, no matter what subcategories of preservation or non-preservation are devised. We thus are surprised that the total number of archeological/historic sites does not remain the same in all five alternatives. Since the RMP relies so heavily on statistical data to quantify the ramifications of several management alternatives on the cultural and natural resources found within the San Juan Resource Area, we are left wondering what the implications are for these resources when the reliability of the data present in the RMP is questionable.

Page 2-98. The economic considerations under the minerals category shows unquantified data under Alternative E. All other alternatives list a value. There seems to be no reason why figures are not available for Alternative E. An explanation is needed for not including data for Alternative E.

Page 2-99. There is an inconsistency between the tables on pages 295 and 299. The table on page 295 shows more wildlife will be created or more habitat protected under Alternative C than Alternative E. THe table on page 299 shows more dollar income generated from wildlife under Alternative E than under Alternative C. The RMP/EIS should explain how Alternative E can generate more money with less wildlife than Alternative C which will create more wildlife.

On Page 2-99 under Wildlife lists income and tax revenues. The common assumption is that more revenues creates more taxes. Alternatives D and E list higher revenues than Alternative C, while Alternative C lists more tax revenues than Alternatives D or E.

Page 3-5. Figure 3-1 - Natural Bridges National Monument is surrounded by a Category 1 designation for oil and gas leases. A Category 3 designation surrounding Natural Bridges would provide a protective zone around the monument. Such a zone is in keeping with the Interior Department's encouragement to provide protection for the natural and cultural resources and important vistas from National Park System areas.

Page 3-19. Figure 3-5, titled Favorable Mineral Materials Areas, identifies an area on State Highway 263 adjacent to Glen Canyon. This area was surveyed in 1985 by the Federal Highway Administration and the NPS and was found to contain materials unsuitable for use in highway construction and maintenance.

page 3-25. Figure 3-7 - This map showing favorable areas for locatable minerals includes small sections of Canyonlands National Park in Indian Creek and on the south boundary in the Elk RIdge Mining District. Most of Natural Bridges National Monument is included in the Deer Flat mining District. Since these two National Park System areas are closed to mineral entry, a more accurate map would exclude the National Park System units from areas with mineral potential.

Page 3-28. The statement that the air is clean over the San Juan Resource Area is generally true. There are many days when the air quality is in poor condition for a variety of reasons. Regional drift across the State line appears to contribute most pollutants to air in the San Juan Resource Area. There are other local conditions developing which cause localized problems,

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Page 2-98, Table 2-10. See chapter 4 for a discussion of economic effects. Alternative A presents the baseline level of mineral activity used to project local economic activity. Management actions under alternatives B, C, and D, would result in quantifiable local economic effects. Under alternative E, several actions could have local economic effects, but these could not be quantified (draft page 4-72). BLM expects the local economic changes due to minerals-related actions in alternative E to be smaller than those quantified under alternative B, C, or D.

Page 2-99, Table 2-10. See chapter 4 for a discussion of economic impacts from wildlife management. The local employment, income, and tax revenues generated by wildlife would be greater under alternative C than under alternative E. Table 2-10 had an error: alternative C is projected to result in income generated by wildlife of $73,700, not $44,500 (see revisions to draft table 2-10).

Page 3-5, Figure 3-1. Chapter 3 shows the existing situation. Figure 3-1 shows the existing oil and gas categories, not changes assessed under the different alternatives. The Secretary has directed that integral vistas be handled by state governments, not by BLM (see the response to comment 6, Sierra Club, Cache Group, comment page 3, on this topic).

Page 3-19, Figure 3-5. State Highway 263 (now 276) near Glen Canyon NRA was constructed with mineral materials from the area adjacent to Glen Canyon NRA shown in figure 3-5. NPS used this same source for material for its road at Hall's Crossing in the 1970s. While it is true that the mineral materials in that area are not of the highest quality, they are the only mineral materials available in the general vicinity for road maintenance. The cost of hauling materials from other sites farther from Glen Canyon NRA would probably be prohibitive.

Page 3-25, Figure 3-7. Figure 3-7 depicts geologic potential for uranium occurrence along with established mining districts. Establishment of Canyonlands NP and Natural Bridges NM and the related mineral withdrawals affect neither the geologic potential present nor the historic mining district boundaries.

Page 3-28. Regional air quality depends on a complex mix of factors. The problems mentioned in this comment are beyond the considerations of this RMP/EIS. Regional haze is a problem for interstate regulatory enforcement and resolution by the state governments involved. No small industries are located on public lands within SJRA; emissions would be regulated by the state. Woodburning stoves, virtually all located on private lands, also come under the purview of state regulation. Neither source would be associated with public land management within SJRA.

such as smoke from wood burning stoves and small industries. The air quality issue needs to be recognized as very complicated problem. The National Park Service is happy to see the recognition given to Canyonlands as a Class I area.

Page 3-31. The RMP/EIS should define the criteria used to establish flood hazards. There are certainly more stream channels with flood hazards than are shown. For instance, all of White Canyon, including the major tributaries, has a known flood hazard.

Page 3-41. One of the best nesting populations of peregrine falcon in the lower 48 states occurs along the Colorado River, including Lake Powell. Many canyons leading to Lake Powell support peregrines. There is little question that peregrines utilize public lands for hunting, for migrating, and most likely for nesting. The following canyons east of Glen Canyon National Recreation Area should be considered for peregrine falcon habitat and should be managed to protect cliffs, riparian vegetation and reverine birds: Imperial Canyon, Gypsum Canyon, Palmer Canyon, Bowdie Canyon, Rockfall Canyon, Park Canyon and Sheep Canyon. It is essential to recognize these areas as potential habitat. They should not be dismissed as unimportant simply because the inventory is not complete.

Page 3-43. Figure 3-11 - Wildlife Habitats: Bighorn - The Natural Resource Management Plan for Natural Bridges National Monument identifies a recommendation of reintroducing desert bighorn sheep into the monument. Sheep left the area in 1963, according to monument records, but bighorn may be migrating to the northwest corner of the monument. The lands in T36S-R17E and T36S-R18E should be designated as crucial habitat for desert bighorn sheep.

Page 3-45. Figure 3-12 - The deer crucial area extends into Canyonlands National Park as far as T31S-R20E. The Salt Creek drainage is part of the crucial deer winter range for the Abajo Mountains herd.

The upper 30 miles of White Canyon should be classified as riparian/aquatic habitat.

Page 3-47. To complement the Natural Bridges National Monument RMP the public lands surround the monument should be included within the White Canyon - Red Canyon habitat management plan.

Page 3-50. Table 3-6 - White Canyon was not included as a riparian zone even though the canyon contains a perennial stream.

Page 3-53. Under the paragraph on grazing in Glen Canyon National Recreation Area an Interagency Agreement between the Bureau of Land Management and the National Park Service has recently been finalized and should be added to that paragraph as a reference.

The grazing section beginning on page 3-53 does not identify any existing or potential livestock-recreation conflicts. With development and increased visitation to Glen Canyon National Recreation Area some conflict presently exists in many others. For the most part conflicts occur near developed areas and in undeveloped sites which receive frequent recreational use. The

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Page 3-31, Figure 3-9. The text of the draft has been changed to clarify areas subject to flood hazards (see revisions to draft page 3-33).

It is true that more stream channels are subject to flooding than are shown in the draft; any stream channel is subject to flooding, and only selected channels are shown in figure 3-9. The areas shown are based on mapping originally done at a 1:24,000 scale. At this scale, White Canyon and several other drainages had floodplains too narrow to show up in the mapping process. Site-specific impacts to these smaller channels would be determined at the project level (draft pages 2-1, A-1 and A-29). Any project that would potentially affect floodplains or flood-prone areas would require an onsite inspection by BLM staff specialists.

Page 3-41. BLM agrees that peregrine falcons are important. The draft discusses T/E species management on page 2-8.

Page 3-43, Figure 3-11. The crucial bighorn sheep habitat is identified as rutting or lambing areas (draft page 3-41). Not all of the area mentioned in this comment is used by the sheep for rutting or lambing; therefore, it does not qualify as crucial habitat.

Page 3-45, Figure 3-12. The crucial deer habitat is identified as areas of public land that provide winter habitat for concentrated numbers of deer (draft page 3-49). Therefore, habitat areas on federal lands managed by other agencies are not shown as crucial habitat. White Canyon has been added to the list of riparian areas (see revisions to draft table 3-6).

Page 3-47, Figure 3-13. Figure 3-13 shows the boundaries of the White Canyon-Red Canyon HMP are shown as they currently exist. The Natural Bridges plan [NPS, 1986] states that there are no bighorn sheep in the NM (although it may be possible to reintroduce the sheep), and that mule deer population numbers are unknown. The draft identifies areas of highest priority for implementation of HMPs over the next 10 years (draft appendix B). As the RMP is periodically reviewed, other areas could be identified for preparation of HMPs after the identified HMPs are implemented. It is not clear to BLM how expansion of the White Canyon-Red Canyon HMP would complement the deer monitoring activities in Natural Bridges NM (the only wildlife project identified in the NM plan).

Page 3-50, Table 3-6. White Canyon has been added to the table (see revisions to draft table 3-6).

Page 3-53. The text has been changed to include the latest BLM-NPS interagency agreement on grazing (see revisions to draft page 3-53).

BLM is not aware of any specific livestock-recreation conflicts in either SJRA or Glen Canyon NRA. As stated in this comment, NPS, not BLM, is responsible for management of recreational uses of Glen Canyon NRA.

plan should recognize existing and potential recreation-livestock use conflicts. As they relate to Glen Canyon National Recreation Area, it should state that BLM will work with the NPS to mitigate these conflicts when they are identified by means of seasonal use modifications, area closures or by other means which may be appropriate.

We support the preferred alternative goal of spring grazing closures both for the protection of vegetation during its critical growing season and as the best means of reducing recreation-livestock conflicts throughout those portions of the allotments on Glen Canyon National Recreation Area. All allotments on the national recreation area should be included on the selected list.

Page 3-54. Crested wheatgrass has no beneficial value to native animals, only livestock benefits. Reseeding with native plants benefits livestock as well as wildlife. A recent article on livestock grazing on public lands states that crested wheatgrass attracts grasshoppers and is favorable for population growth of grasshoppers ("Audubon" Magazine, August 1986). With the spraying program taking place in the west, it would seem to benefit Bureau of Land Management to not plant vegetation which favors grasshoppers. Crested wheatgrass also can out complete native plants in seed mixtures. If the seed mixture is heavy on the crested wheat, other plants may not even succeed.

Page 3-57. Riparian areas are identified as heavily utilized by livestock. However, the issue is not addressed in the plan. A policy and recommended actions for protection and rehabilitation of riparian areas should be stated in the plan. Riparian areas are ecological zones in the desert, environments significant well beyond their actual size.

The draft plan also recognizes that hanging gardens contain unique plant species. While not stated in the draft, livestock are known to utilize hanging garden areas which are accessible to them. Several sites in Glen Canyon are known to have livestock impacts to hanging gardens, Knowles Canyon and Cottonwood Canyon are two examples. No policy on hanging gardens management is stated in the plan or its alternatives. A policy with specific actions should be included in the plan.

The draft identifies the significance of relict plant communities and proposes to protect them as either research natural areas or areas of critical environmental concern. While it was appropriate that none were proposed in Glen Canyon, the NPS is currently surveying the national recreation area to identify relict plant communities. Once identified, the NPS will propose to establish them as research natural areas and then will develop site specific management plans to preserve these areas. It is possible that one or more sites may be identified in the area covered by the draft RMP. The RMP must maintain the flexibility to adjust mineral and grazing activities on the national recreation are accordingly.

None of the alternative land treatment proposals appear to include lands within Glen Canyon National Recreation Area. We concur with this approach. Land treatments are not appropriate within the national recreation area.

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The goal for livestock grazing under alternative E includes changing season of use where needed (draft page 2-16). Four allotments would have spring grazing excluded; none of these is in Glen Canyon NRA. Spring grazing within Glen Canyon NRA on allotments having AMPs is rotated among pastures to allow some areas to have spring rest every year. This would also be the goal for allotments where AMPs are yet to be developed. (See also the response to comment 67 from Rodney Greeno on this topic.)

Page 3-54. BLM does not agree that crested wheatgrass retards success of other species and has no beneficial value to native animals. In some areas, crested wheatgrass is used to provide initial ground cover to retard erosion until other (native) species can become established. Native species typically coexist with crested wheatgrass--even in seeding areas. Crested wheatgrass, an important spring and fall forage for both livestock and mule deer in SJRA, is useful to any animal that eats grass. USFS studies have shown that, in closed pinyon-juniper stands, chainings increase wildlife population numbers and species diversity. Crested wheatgrass is used in rehabilitation because it is generally more successful for rapid revegetation in disturbed areas than are native species. The only part of SJRA requiring a grasshopper spraying project was an area with native range.

Page 3-57. Chapter 3 discusses the current situation and does not present management proposals to resolve stated problems. Alternative management for riparian areas and the impacts of those proposals are discussed in the draft.

BLM is aware of the significance of riparian areas. Some riparian areas would have grazing exclusions on a smaller scale under AMPs prepared after completion of the RMP. Other riparian areas would be managed for improvement through grazing systems, allowing periodic rest from grazing (draft appendix U). (See also the response to comment 67 from Rodney Greeno on this topic.)

The RMP is intended to provide broad allocations for use of public resources. Grazing use of specific areas, such as hanging gardens, would be addressed at the activity level of planning, through an AMP prepared after completion of the RMP (draft page 2-6).

The RMP will be reviewed and updated as needed (draft appendix B). This will provide the flexibility suggested in this comment. Regarding grazing adjustments in Glen Canyon NRA, changes can be made within the guidelines and authority of BLM-NPS agreements for management of grazing within the NRA.

Page 3-58 through 3-65. This discussion should include a recognition of Hovenweep National Monument, its relationship to surrounding public lands, and the significance of surrounding cultural resource sites to Hovenweep.

Page 3-59. Table 3-7, "Grazing Allotments with Potential for Special Management", has a column on livestock manipulation techniques where it identifies allotments and total acres with a footnote stating that this applies to BLM and Glen Canyon National Recreation Area acres. Nowhere else in the document is this discussed. Since it appears that specific livestock manipulation techniques were considered, the specific technique and its location should be identified in the plan so that the effect can be evaluated. It is impossible to evaluate this important section without more information.

We support the proposal that allotment management plans (AMP) be development for all allotments without them. For those allotments extending onto Glen Canyon National Recreation Area the NPS should be included in the planning process as an interested party.

Page 3-60. At least some information should be provided concerning the paleontological resources in the area, their rate of occurrence, possible significance, and potential impacts. This information can be developed in the form of a sensitivity assessment, bases on geologic maps, without the need for field inventory. The possible occurrence of dinosaur fossils, noted on page 3-60, suggests that there are important resources here which should not be overlooked.

Page 3-61. Figure 3-15 - The NPS strongly supports designating Beef Basin as an archeological zone with potential nomination to the National Register. Beef Basin seems to be closely affiliated with the adjacent Salt Creek Archeological District in Canyonlands and has great archeological significance.

The lands surrounding Natural Bridges National Monument should be investigated for inclusion in the Cedar Mesa Archeological District with potential for National Register listing. The NPS will likely nominate most of Natural Bridges National Monument for the National Register which would complement the surrounding BLM district.

Page 3-67. Figure 3-16 - When responding to the Utah Bureau of Land Management wilderness proposal the NPS recommended the area between Bridger Jack wilderness study area and the Canyonlands National Park boundary be included in a wilderness area. Figure 3-16 includes a portion of this as a Roaded Natural Area (RN). Before any lesser designation is applied to this area, we encourage BLM to await the final outcome of the wilderness legislation.

The recreation opportunity spectrum classes (ROS), as shown in figure 3-16, are not inconsistent with the Glen Canyon General Management Plan zoning of the adjacent national recreation area lands. It is not clear specifically how the ROS zoning will change with other actions associated with each alternative. The final ROS zoning should be clarified in the final document.

[Comment page 18]

Pages 3-58 through 3-65. Draft chapter 3 discusses the affected environment, which includes only those elements of the human environment which would be affected by some alternative assessed in the draft (page 3-1). The management of Hovenweep would not be affected by any alternative assessed in the RMP/EIS; therefore, the national significance of Hovenweep NM is not discussed. Management of Hovenweep NM is discussed in chapter 5. The proposed RMP provides for protection of cultural resource sites adjacent to Hovenweep NM through the proposed Hovenweep ACEC (see revisions to draft chapter 2 and appendixes A, H, and I).

Page 3-59, Table 3-7. This table lists allotments with potential for improvement through intensive management, which would include grazing systems and associated range improvements. All six allotments with Glen Canyon NRA acreage are included on this list; all six also include acreage on public lands. Specific livestock manipulation techniques would be determined when individual AMPs are written or revised for each of these six allotments, and effects on other resources would be evaluated through the NEPA document prepared at that time. Under the terms of grazing agreements, NPS would be involved in developing these AMPs.

Page 3-60. Paleontological resources were discussed in the MSA (pages 4331-1, 4331-16) and in the draft (page 3-60). Little information is available regarding paleontological resources in SJRA; BLM has identified this as a data gap and provided for an ongoing inventory of these resources (draft page 2-6). The draft identified the Morrison and Chinle Formations as the geologic strata in SJRA known to contain fossils; the generalized occurrence of these formations can be determined from figures 3-3 and 3-7. BLM is not sure what is meant by a "sensitivity assessment based on geologic maps"; as noted, figure 3-7 indicates where the target formations are found.

Page 3-61, Figure 3-15. Under the preferred alternative, Beef Basin is included in the West Abajo cultural resource use allocation zone (draft page 2-6). The boundaries shown for the proposed Cedar Mesa Archaeologic District are based on factors relating to the cultural resources and to manageability considerations. Neither nomination nor listing of all or part of Natural Bridges NM to the National Register would affect either factor considered by BLM.

Page 3-67, Figure 3-16. Upon review, BLM has revised inventory data for the roads in Davis and Lavender Canyons and changed the ROS class for these road corridors from R to SPM (see revisions to draft table 3-11). (See also the response to comment 2, National Parks and Conservation Association, comment page 33, on this topic.) Figure 3-16 shows the current ROS classes (draft table 3-11 and appendix F). Suitibility for wilderness designation is irrelevant to ROS classes. As stated in draft table 2-5, the objectives for recreation management vary among alternatives assessed in the draft. Maintaining existing ROS classes is an objective only under alternatives C and E; the specific actions to accomplish this objective are given in appendix A.

Page 3-69. Table 3-10 - Under the criteria for social setting there should be an explanation of how the numbers of encounters will be maintained at the set level. If visitation increases to the point that more than six parties are encountered on a trail in a day in a primitive area, the RMP/EIS should explain whether the designation be changed to a semi-primitive non-motorized or motorized area.

Page 3-73. The NPS supports establishment of developed recreation sites along Indian Creek and Indian Creek Falls.

We also agree that the Indian Creek area has reached capacity for undeveloped campsites accessible by vehicle during April and May. Included in the general Indian Creek area are Davis and Lavender Canyons, Harts Draw, Lockhart Basin and the lands north of U-211 to Indian Creek.

Page 3-81. Your treatment of U-261 as a visual corridor is to be applauded. We feel Highways 95 and 211 should be in this category for scenic protection.

Lockhart Basin deserves the ACEC designation the BLM is proposing.

Page 3-83. Figure 3-18 - Davis and Lavender Canyons are classified as Class IV while all surrounding lands are designated Class II or Class III. Both canyons deserve Class II status.

Land treatments proposed near Natural Bridges National Monument and along Highway 95 are incompatible with the Class II visual resource management designation. Proposed land treatments are also incompatible with the U-95 corridor study. The corridor study recognizes a visual corridor around Natural Bridges which the NPS would like to see maintained.

The corridor study is a regional interagency recommendation which recognizes a person's perception of the monument, road corridor, or other viewpoint does not stop at an artificial political boundary. Highway u-95 was recognized in 1974 as having potential for formal designation as a scenic highway under the Highway Beautification Act of 1965 (u-95 Corridor Study, Page 3). Such a designation would help attract tourists to Southern Utah.

Page 3-89. Figure 3-20 - One hundred ninety one acres is in a Secretarial Withdrawal and should be shown along the Natural Bridges National Monument entrance road.

Page 4-1. The statement is repeated that Alternative C would be relatively expensive to implement, and that Alternative D would be the most expensive. These statements need justification. The only differences between Alternatives C and E are costs in grazing and range improvements.

On Page 4-1 the statement is made the Alternative C would restrict the livestock industry. Table 2-4 on page 2-51 indicates more money would be spent on grazing under Alternative C than Alternative E. This appears to be a contradiction on the cost comparison of alternatives and on the effects of grazing.

[Comment page 19]

Page 3-69, Table 3-10. Table 3-10 presents the criteria that must be met for an area to rate as a certain ROS class. Field inventory determines what class a given area meets. This table is not intended to guide maintenance of ROS classes (see draft appendix A for this information). If the number of group encounters changed, the ROS class would change to meet the criteria given in table 3-10; this does not require a "designation" by BLM.

Page 3-73. BLM appreciates NPS support of developed recreation sites along Indian Creek. Chapter 3 discusses the current situation and does not present management proposals.

Page 3-81. The proposed Scenic Highway Corridor ACEC covers the visual corridor along state highways 95, 261, and 263. State highway 211 is not included, as it was not included in the study cited in the text. Lockhart Basin is not proposed as an ACEC under the preferred alternative. Chapter 3 presents the current situation, not management proposals.

Page 3-83, Figure 3-18. BLM agrees that Davis and Lavender Canyon deserve VRM class II status. Figure 3-18 shows that the two canyons were classified as VRM class II in 1982.

The areas shown as having potential for land treatments (draft figures 2-13 through 2-15) are areas with physical potential. Under the proposed RMP, in the vicinity of Natural Bridges NM, the special conditions for the Scenic Highway Corridor proposed ACEC would have to be met. The corridor leading to Natural Bridges NM along U-275 was included in the Scenic Highway Corridor potential ACEC assessed under alternative D in the final EIS. No benefit to BLM management of the area would occur in this area, so the 3-mile section was not included in the proposed Scenic Highway Corridor ACEC assessed under alternative E in the final EIS. See revisions to draft appendix H for a complete rationale.

Page 3-89, Figure 3-10. Public Land Order 3352, the official withdrawal order for the access road to Natural Bridges NM, cites 175 acres as the area for the road (draft table I-3). The road was not shown in figure 3-10 because it is an ancillary facility.

Page 4-1. See the response for page 2-51, noting that the budget figures have been revised (see revisions to draft table 2-4 and appendix K).

Under draft alternative C, changes in grazing management were projected to be detrimental to livestock operators in SJRA (draft page 4-45). The alternative shows increased grazing and range improvement costs, primarily because of the expense of excluding livestock from riparian areas. (See also the response to comment 9 from Southern Utah Wilderness Alliance, on this topic.)

Page 4-2. The first paragraph states more acreage would be closed to livestock under Alternative E than under Alternative C. AT the same time more forage would be available under Alternative E. This means more manipulation of the land and range improvements. This seems to be misleading and needs to be clarified as more environmental effects would accrue under Alternative E.

Page 4-3. Table 4-1 has no apparent meaning. The term thresholds of significance needs defining. There is no reference to this table in the text.

Page 4-8. The RMP/EIS identifies the area north of Aneth as having the greatest potential for oil and gas discoveries. On page 4-8, the statement is made that, " . . no surface occupancy stipulations adjacent to Hovenweep National Monument in the Blanding Basin coincide with an area that contains the greatest potential for new discoveries and the majority of production operations." This is misleading since there are not production facilities within the 2,000-acre zone around Hovenweep, and in light of the fact that several dry holes have recently been drilled within that zone.

Page 4-11. The loss of 600,000 tons of soil per year due to grazing is significant. A major concern across the United States is the loss of topsoil. Expensive campaigns have been conducted to make the public aware of this problem The RMP/EIS should address whether this loss of soil is due to overgrazing. If the answer is yes, reconsidering the Preferred Alternative may be in order to mitigate the effects of grazing.

Page 4-14. Presently bighorn sheep in the San Juan Resource Area are experiencing a decline. Survey data for the past three years have shown lamb ewe ratios to be dropping and the population is declining. The Utah Division of Wildlife Resources' data shows this to be happening but no one seems to be mentioning it. In 1986 reports of dead bighorn sheep have been turned in by river users along the Colorado River. Fourteen sheep have been reported dead from Indian Creek in Canyonlands National Park south to Blue Notch Canyon in Glen Canyon. The sheep are probably dying from a disease but this has not been confirmed. There is serious doubt the present population is 1,100 animals in the San Juan Resource Area. There is little reason to believe the population will reach 1,210 animals by the year 2000. More definitive research is needed before management plans can be based on current numbers and projections.

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment page 20]

Page 4-2. Implementation of land treatments would increase livestock AUMs under alternative E (see revisions to draft page 4-2).

Page 4-3, Table 4-1. NEPA and the CEQ guidelines require that an EIS assess significant effects to the human environment (42 U.S.C. 4321; 40 CFR 1502.1, 1508.27). The threshold of significance is that level where a projected effect is thought to become significant (BLM NEPA Handbook, Part B, section 2.4 B). The threshold is especially relevant for determining the point at which individually insignificant impacts, when taken cumulatively, could cause a significant impact (40 CFR 1508.7) (draft page 4-2). Table 4-1 lists these threshold levels. (See also the response to comment 22, Environmental Protection Agency, for a discussion on this topic.)

Page 4-8. As noted in the draft (figure 3-2), the general area around Hovenweep NM has the greatest potential for new oil and gas discoveries. The "dry holes" referenced in this comment had oil and gas shows that were not sufficient to be considered for commercial production. The geologic nature of fields in this area is such that a few hundred feet can make the difference between a producing well and a dry hole.

Page 4-11. The RMP/EIS does not describe effects of "overgrazing," because the court-ordered monitoring studies cannot be completed prior to the RMP. The draft estimates the effect of grazing on soils loss; this assumes grazing at proper use levels. This type of impact was considered for all alternatives assessed (draft chapter 4). Under alternative A, grazing results in the loss of an estimated one-third ton of soil per acre per year, or a loss of about 600,000 tons by the year 2000. Under the different alternatives assessed, the resulting soils loss would vary (draft table 2-10 and chapter 4). The loss of 600,000 tons under alternative A is not considered to be a significant loss, since tolerable loss from cultivated lands is considered to be 1 to 5 tons per acre per year (the tolerable soils loss from semiarid rangelands would be expected to be less). The actual effect of grazing management on soils loss could not be estimated (draft page 4-11).

Page 4-14. At the time the draft was being prepared, UDWR studies indicated that the bighorn sheep popluation was increasing. BLM is aware that, since the draft was published, the bighorn sheep population is declining for unknown reasons. However, given the cyclic nature of the animal populations, the latitude of the population estimates provided by UDWR and estimates used in the draft, and the lack of available data on current popluation numbers, the estimates have not been revised for the final EIS. BLM agrees that more definitive research into population numbers is needed (see the response to comment 27 from the U.S. Fish and Wildlife Service on this topic).

Page 4-16. There is a disturbing lack of progress in protecting archeological sites, as quantified in the projections of sites damaged. The RMR/EIS indicates damage to, or loss of, cultural resources would continue at the present rate until the year 2000. This indicates there will be no improvements in the Bureau of Land Management's ability to protect cultural resources.

The second paragraph, right hand column, states the loss of sites will result in the loss of opportunity to manage cultural resources. The opportunity exists now, it would seem, to manage cultural resources to prevent the loss of sites.

In the fourth paragraph. right hand column, the impacts to natural history and paleontological sites are not to be considered significant. The same paragraph admits there is a lack of data to quantify the impacts to these sites. If data do not exist, a conclusion should not be drawn, and a plan to the year 2000 should not be formulated.

Cultural resources, natural history and paleontological resources do not seem to be given the same importance as consumptive and damaging land uses. Before the resources are sacrificed their national significance should be assessed. THe RMP/EIS should explain how other management use zones can be determined when the cultural, natural history and paleontological resources have not been inventoried, their importance determined and protection measures considered in the total resource management plan. The NPS suggests cautious and strong protection of cultural resources and development of a specific cultural resources management plan for the San Juan Resource Area.

Page 4-17. As mentioned, the NPS feels lands surrounding the National Park System areas should be accorded ACEC designation. Visual and noise intrustions and damage to natural and cultural resources from recreational off road vehical use are not compatible with such a designation on these adjacent areas. Off road vehical use should not be allowed in any areas with a chance of being included in the final BLM wilderness bill. Several wilderness study areas adjacent to Canyonlands were recommended for enlargement in comments to the draft wilderness proposal.

Page 4-18. The view from the Needles Overlook needs to be considered as a Class I visual resource management area.

Page 4-23. If the air quality in the Grand Gulch and Dark Canyon primitive areas was important in Alternative A, Page 4-10, the air quality should remain important under all alternatives. The resource has not changed, nor have the requirements of the Clean Air Act.

Page 4-24. Comments regarding soil loss are the same as were made for this subject under Alternative A on Page 4-11.

Page 4-27. The cultural resources are finite, tangible objects. Their importance is recognized an protected by federal and state laws. Each alternative should treat these resources the same. If they are important in one alternative, they are equally important in all alternatives.

Page 4-36. Comments on soil loss are the same as for Alternative A on Page 4-11.

[Comment page 21]

Page 4-16. The page cited refers to continuation of current management. The assessment of impacts that would occur under alternative A is provided for the purpose of comparison (draft page 4-2). An EIS compares the effects of current management with those of the alternatives. The impact projections show that protection of cultural sites would improve under the preferred alternative (draft page 4-68). BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

This comment correctly notes that BLM cannot quantify the number of natural history and paleontological resources sites or the impacts to them. Within SJRA, these types of resources are plentiful. The suggestion that a complete data base must first be compiled, and effects projected with certainty, does not follow CEQ regulations (40 CFR 1500).

Page 4-17. See the response to comment 2, National Parks and Conservation Association, regarding designating an ACEC next to an NPS unit.

The draft RMP/EIS applied the least restriction neccessary to resolve resource conflicts (see response to comment 2, National Parks and Conservation Association, on this topic). ORV designations are different under each alternative because of differing management objectives (draft table 2-8 and appendix A). Areas under review for wilderness designation are managed under the IMP (draft page 1-2); the IMP provides for ORV use of WSAs in some cases.

Page 4-18. The page cited describes impacts under current management. The view from the Needles Overlook is currently VRM (draft figure 3-18). Under other alternatives assessed, the area viewed from Needles Overlook would be managed under VRM class I objectives (draft appendix A).

Page 4-23. Air quality protection for the Grand Gulch and Dark Canyon Primitive Areas did not come from the Clean Air Act, as stated in this comment, but from district management policies. Under alternative A, the primitive designation would continue, and so would the air quality protection. Under alternative B, this type of resource value would not be protected.

Page 4-24. See the discussion on soils loss under page 4-11.

Page 4-27. All alternatives recognize the legal requirements for management of cultural resources (draft page 2-6). Treatment of cultural resources varies under the alternatives to meet different management objectives (table 2-5).

Page 4-36. See the discussion on soils loss under page 4-11.

Page 4-41. Add the view from the Needles Overlook to the list of ONAs.

Page 4-42. Concerning motorized recreation, comments are the same as for Alternative A, Page 4-17.

Preliminary study indicates Beef Basin was the population center for Anasazi habitation and use in Canyonlands National Park's Salt Creek Archeological District. To emphasize recreation in Beef Basin without corresponding protection of the cultural resources denies the importance of these resources.

Recrational off road vehicle use comments are the same as for Alternative A, Page 4-17.

Page 4-43. The view from the Needles Overlook should be included in a visual resource management Class I area.

Page 4-48. In the conclusion for Alternative C there needs to be substantiation that 15 jobs would be lost in the livestock industry. On page 4-40 grazing impacts list 37,840 fewer acres open to grazing, but the number of allotments will remain the same. The number of people dependent on livestock would seem to be tied more to the numbers of allotments than having a few acres taken off each allotment.

There needs to be a better justification of an income loss of $260,000 and a total rancher wealth loss of $2,161,000 from 37,840 acres being withdrawn from grazing. BLM states on Page 4-45 that livestock forage AUMs would increase because of new land treatments while AUMs would be lost because of other activities. It also states that AUMs would increase for eight operators by 2% and decrease for 16 operations by 28%. Thirty of 54 livestock operators would not be affected. If 16 operators are affected by decreases and $2,171,000 income is lost, the average income for those 16 is $135,681. If determination of long range management is to be made on these figures, the public needs a more clear breakdown of which jobs will be lost, who will be affected by the loss of 37,840 acres of grazing land, and the extent of loss to each allotment.

Under Alternative E, 100,000 acres would be eliminated from grazing but AUMs would increase by 365. The RMP/EIS should explain how the 36,840 acres eliminated from grazing under Alternative C result in the loss of 12,000 AUMs.

Page 4-64. Comments on soil loss are the same as for Alternative A, Page 4-11.

Page 4-65. Concerning land treatments on 31,300 acres, refer to earlier comments on view areas from Natural Bridges National Monument and the Highway 95 road corridor.

Page 4-66. Under the heading Wildlife Impacts, see comments on bighorn sheep for Page 4-14.

Livestock will be excluded from five mesa tops. The RMP/EIS should define which five mesa tops will be excluded from grazing. Bridger Jack and Lavender Mesas were mentioned previously and are assumed to be among the five.

[Comment page 22]

Page 4-41. Chapter 4 discusses impacts expected to occur under the different alternatives assessed; it does not present management proposals for special designations (see, for example, draft table 2-6). The view from the Needles Overlook was considered for ACEC designation under draft alternatives C and D. BLM has dropped the ONA designation in favor of the ACEC designation.

Page 4-42. See the discussion for ORV designations, page 4-17.

The Beef Basin area was nominated in other comments as a potential ACEC to protect cultural resource values, and is assessed in final EIS alternative D. For a discussion of this nomination, see comment 2 from National Parks and Conservation Association and BLM's response.

Page 4-43. See the discussion on the view from Needles Overlook, page 4-18.

Page 4-48. The loss of 15 jobs is explained on page 4-45.

The job and income losses and reduced livestock production under alternative C were projected to result from the reduced amount of public rangeland and forage available and the changes in season of use (draft table 2-7). Production, cost of production, and jobs are more closely tied to seasons of use, forage availability, and cost of forage than to the number of acres available for grazing. Details on production and costs are explained in draft appendix R. The loss of AUMs in alternative C would result primarily from licensing grazing at lower levels to maintain existing ROS classes (draft page 4-40).

Page 4-64. See the discussion on soils loss, page 4-11.

Page 4-65. See the discussion on land treatments near Natural Bridges NM, page 3-83.

Page 4-66. See the discussion on bighorn sheep populations, page 4-14.

Livestock exclusions from five mesa tops are proposed to protect a portion of the crucial bighorn sheep habitat. The five mesa tops are identifed in the draft (figures S-4 and 3-11 and page A-22). Bridger Jack Mesa and Lavender Mesa are not within the crucial bighorn sheep habitat; they are not part of the five mesa tops where livestock exclusions would be made to protect crucial habitat. However, grazing would be excluded on these two areas to protect the relict plant communities present (draft figure S-4 and page A-21).

It should also be explained whether there is grazing on any of these five mesa tops now and if these five mesa tops accessible to cattle. If cattle can not use these mesa tops accessible to cattle. If cattle can not use these five mesa tops, bighorn are not gaining any habitat even though we are led to believe there is a gain.

Page 4-68. Alternative E eliminates grazing on 100,400 more acres than Alternative A, but AUMs would incresae by 367. In Alternative C, grazing would be eliminated on 37,840 acres but AUMs would decrease by 12,3930. The EIS must substantiate these figures and show how the Bureau of Land Management arrived at these conclusions.

See the comments under cultural resources for Page 4-16. On Page 4-69 Beef Basin should be included in the potential National Register properties.

Pages 4-68 through 4-69. The environmental consequences discussion for the preferred alternative should include effects on Hovenweep National Monument. The Hovenweep General Management Plan/Environmental Assessment of October, 1985, may assist in this discussion.

Page 4-70. Concerning off road vehicle use, see comments for Page 4-17 and for Beef Basin on Page 4-42.

Page 4-71. The view from the Needles Overlook should be included as a Class I visual resource management area.

Page 4-3. In table 5-1, "Agencies Consulted," under Glen Canyon NRA only the Mineral Management Plan is listed. Additional topics and issues discussed during meetings, by phone and through correspondence, include; the General Management Plan, the Natural Resource Management Plan, the draft Cultural Resource Management Plan, draft Water Resources Management Plan, Memorandum of Understanding for Grazing, and Glen Canyon National Recreation Area enabling legislation (PL 92-593).

Page 5-5. Under Canyonlands National Park, the statement that the 1978 General Management Plan for Canyonlands National Park established off road vehicle use zones is misleading. There is no off road use allowed in Canyonlands National Park. All motorized use in the Park is restricted to designated roads by vehicles licensed for highway use.

There is currently no general management plan for Natural Bridges National Monument in final or draft form.

The San Juan Resource Management Plan states the Canyonlands National Park Resource Management Plan does not address adjacent land use. Pages 52 and 53 of the Canyonlands National Park Resource Management Plan discuss issues on adjoining land that may influence Canyonlands National Park.

Under Glen Canyon NRA, in the first sentence of paragraph 3 change "would" to "may." After ORV use insert "restricted to designated road and to designated and posted ROV use areas." Add on sentence at the end:

> "The BLM mandate of multiple use and sustained yield creates difficulties in coordination and compatibility with NPS plans which are based upon NPS preservation mandates."

[Comment page 23]

As stated in the draft (page 3-58), cattle and bighorn sheep do not now compete for forage, space, or water; however, there is potential for a conflict in the future. It is this possible future conflict that the grazing exclusions on the five mesa tops would prevent. Although these five mesa tops are not grazed heavily, cattle can access some of them, and some grazing use presently occurs. Elimination of grazing use on the mesa tops would prevent future range improvements geared toward increasing grazing use of the mesas, such as construction of a dugway or livestock trail, land treatments, or water improvements. The elimination of grazing would serve to ensure that large tracts of land remain relatively undisturbed, which would benefit the bighorn sheep over time.

Page 4-68. The reasons for changes in acreages excluded for grazing, and in AUMs, are explained on draft page 4-40 for alternative C and page 4-68 for alternative E.

Regarding comments on management of cultural resources, chapter 4 of the draft presents an impact analysis, not management proposals. Regarding National Register nominations, see the discussion for page 2-31. Regarding Beef Basin, see the discussion for pages 4-16 and 4-42.

Pages 4-68 through 4-69. No impacts to Hovenweep NM were projected to occur from any alternative assessed. The provisions of the October 1985 assessment are discussed on draft page 5-6 (see also revisions to draft page 5-5). (This was not a final management plan.)

Page 4-70. See the discussion for ORV designations, page 4-17.

Page 4-71. See the discussion on the view from Needles Overlook, page 4-18.

Page 5-3, Table 5-1. Table 5-1 has been revised to reflect the additional discussions mentioned (see revisions to draft table 5-1 and page 5-6).

Page 5-5. Under the terminology used in this RMP/EIS, closing an area to ORV use or limiting ORV use to designated roads and trails (such as Elephant Hill) is synonomous with establishing ORV use zones.

The draft was referring to the Natural Resources Management Plan for Natural Bridges, which was incorrectly cited as a general management plan (see revisions to draft page 5-5).

The draft has been revised as requested in this comment regarding Glen Canyon NRA (see revisions to draft page 5-6).

Page A-5. The emphasis in this section with restrictions on the archeological consultant rather than on detailing requirements for the actual surface activity contributes to our pessimism about successfully fulfilling our commitment to preserving the total cultural sequence at Hovenweep National Monument. For example, a glaring shortcoming in this mitigation section is the absence of provisions for the cessation of ground disturbance of archeological sites located during development operations, but which previously had gone undetected by the archeological consultant.

Page A-75. Under management prescriptions for special management areas, we would like to include a section addressing the ACEC and ONA adjacent to Canyonlands National Park and Natural Bridges National Monument. In general, the management prescription proposed under Alternative D for Bridger Jack Mesa is applicable to the National Park Service's proposal. Further prescriptions should include:

- Reclamation should be performed with native species only.
- Closed to mineral leasing.
- No surface occupancy.
- Vehicles should be restricted to existing roads.
- Class I or II VRM designation, depending on whether or not the area is a WSA or wilderness.
- Any proposed action should include an action plan submitted for review by the National Park Service.

In summary, the above cited law (16 USC 1a-1) obligates the Secretary not to take any action that would derogate the purposes of units of the National Park System unless specifically directed by the Congress. We fully support the establishment of ACEC's and other management initiatives that offer an optimum measure of appropriate use and protection of the resources of the public lands. At the same time we advocate BLM's use of those management practices which will be compatible with management of adjoining units of the National Park System, such as eliminating grazing at Hovenweep National Monument.

We are fully aware of the complicated management procedures that multiple use of public lands creates for the BLM, and we appreciate the very difficult task that agency faces in providing cultural resource protection in the San Juan Resource Area. At the same time, we believe that this RMP/EIS offers an outstanding opportunity for the BLM to choose management alternatives that will result in optimal resources management for both NPS and BLM. Please feel free to continue meeting and working with the staffs of the various park areas to achieve our mutual goals.

Enclosures

RESPONSE TO COMMENT 28

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

[Comment page 24]

Page A-5. The section cited in this comment describes current field operating procedures. Additional mitigation conditions are provided for the different alternatives assessed; compare, for example, the proposed spcecial conditions under the preferred alternative for management of cultural resources (draft page A-27).

Page A-47. The suggested management prescriptions for potential ACECs have been incorporated into appendix I of the proposed RMP and final EIS (see revisions to draft appendix I). The ONA designation has been eliminated from the preferred alternative, but is carried in the proposed RMP and final EIS under the other alternatives for ease of reference.

Summary. BLM agrees that the San Juan RMP/EIS is a complex document covering a complex area. While BLM is aware of (and acknowledges the validity of) the NPS mandate for single-use preservation, the San Juan RMP is intended as a land-use plan to allocate and manage the variety of multiple uses authorized by Congress to take place upon public lands. The RMP must take its place within the structure of laws, executive orders, regulations and departmental policies governing the administration and use of public lands and resources, and cannot provide for uses or restrictions of uses that do not conform to this overlying structure.

NOTE: Photocopied pages from the Federal Register and a map not suitable for reproduction were included with this comment letter, but have not been reprinted.

Change to the EIS? Yes.

COMMENT 29

United States Department of the Interior

OFFICE OF SURFACE MINING 6013.2

Reclamation and Enforcement

BROOKS TOWERS

1020 15TH STREET

DENVER, COLORADO 80202

2 6 AUG 1986

MEMORANDUM

TO: Ed Scherick, Area Manager, San Juan Resource Area, Utah
Bureau of Land Management

FROM: Mel Shilling, Chief
Mining Analysis Division
Western Technical Center

SUBJECT: San Juan Resource Area Resource Management Plan and Environmental Impact Statement (RMP/EIS)

We have reviewed the draft RMP/EIS for the San Juan Resource Area and are submitting several comments and suggestions (attached) for your consideration. We appreciate this opportunity to participate in the review of the document and look forward to seeing the final RMP/EIS.

If you have any questions concerning these comments or any other matter relating to the RMP/EIS, please feel free to contact Floyd McMullen in Denver at (303) 844-2451 or FTS 564-2451.

Attachment

RESPONSE TO COMMENT 29

OFFICE OF SURFACE MINING, RECLAMATION AND ENFORCEMENT

[Comment cover letter]

BLM appreciates this review of the draft.

OSMRE REVIEW OF THE DRAFT RMP/EIS FOR THE
SAN JUAN RESOURCE AREA, UTAH

Comments/Suggestions:

Page 2-2, para. 7 (Coal Management). Please rework your statement concerning approval of a mining permit application package to explain that, upon approval of a pending cooperative agreement, a State permit to conduct coal mining operations will be issued by the Utah Division of Oil, Gas, and Mining. The mining plan contained in the permit application package, upon recommendation by OSMRE and consent by the Federal surface-managing agency, will be approved by the Assistant Secretary for Land and Minerals Management. You may include the following discussion if it is appropriate:

> The Surface Mining Control and Reclamation Act of 1977 (SMCRA) gives OSMRE primary responsibility to administer programs that regulate surface coal mining operations on Federal lands and the surface effects of underground coal mining operations on these same lands. Pursuant to Section 503 of SMCRA, the Utah Division of Oil, Gas, and Mining (DOGM) developed, and the Secretary of the Interior approved, a permanent program authorizing Utah DOGM to regulate surface coal mining operations and surface effects of underground mining on non-Federal lands within the State of Utah. In late 1986, pursuant to Section 523(c) of SMCRA, Utah DOGM is anticipated to enter into a cooperative agreement with the Secretary of the Interior authorizing Utah DOGM to regulate surface coal mining operations and surface effects of underground mining on Federal lands within the State.
>
> Pursuant to the upcoming cooperative agreement, Federal coal lease holders in Utah must submit permit application packages (PAP's) to OSMRE and Utah DOGM for proposed mining and reclamation operations on Federal lands in the State. Utah DOGM reviews the PAP to ensure that the permit application complies with the permitting requirements and that the coal mining operation will meet the environmental performance standards of the approved permanent program. OSMRE and other Federal agencies review the PAP to ensure that it complies with the terms of the coal lease, the operation and reclamation requirements of the Mineral Leasing Act of 1920, as defined in SMCRA, the National Environmental Policy Act of 1969, and other Federal laws and their attendant regulations. Utah DOGM issues a State permit to the applicant to conduct coal mining operations. OSMRE recommends approval, approval with conditions, or disapproval of the mining plan contained in the PAP to the Assistant Secretary for Land and Minerals Management. The Federal surface-managing agency must consent to this recommendation.

RESPONSE TO COMMENT 29 — OFFICE OF SURFACE MINING, RECLAMATION AND ENFORCEMENT

[Comment page 1]

The text of the draft has been revised to accommodate the suggestions regarding the mining permit application package (see revisions to draft page 2-2).

Utah DOGM enforces the State and Federal environmental performance standards and permit requirements during operation of the mine and has primary authority in emergency environmental situations. OSMRE oversees this enforcement. BLM has authority in those emergency situations where Utah DOGM or OSMRE inspectors are unable to take action before significant harm or damage to the environment occurs.

Page 2-62, table 2-7 (Coal Management). Please reconsider your proposed restriction to not allow coal exploration activity under the various alternatives. Your assumption that no coal mining would occur in the area for at least 10 years appears to be reasonable and is sufficient justification for postponing coal leasing. The apparent lack of available information on the quantity and quality of the coal resource points to the need for coal exploration; work that must occur many years prior to any lease proposal or resource development. Not allowing coal exploration activity under the various alternatives seems rather restrictive, especially since it would have little impact on the environment. Coal exploration impacts should be very similar to the other mineral exploration activities you propose to allow.

Page 3-28, para. 2 (Air Resources). We suggest expansion of the visibility discussion to provide information on the existing visibility (e.g., background visual range) within the Resource Area. Impact discussions of this sensitive resource in chapter 4 would be much clearer to the reader as a result of additional background material being presented here.

Page 3-54, para. 5 (Grazing Resources). Please define your use of the term "ecological site" for the reader either here or in the glossary.

Page 4-1, Environmental Consequences - General.

a. Please consider adding discussions regarding the secondary impacts of the various proposals on fish and wildlife resources throughout this chapter, as appropriate. Secondary activities resulting from resource development could include population growth, need for housing, increased demand for hunting, fishing, and other outdoor recreation, all of which could affect fish and wildlife in one way or the other.

b. Please consider adding discussions regarding the natural processes of soil erosion and headcut migration due to the rapid rate of landform development (geomorphology) throughout this chapter, as appropriate. Those watersheds with significant soil erosion problems due to natural processes should be identified. Those that cannot be improved by proper range management should be acknowledged and other management options for those areas should be considered.

Page 4-13, para. 1 (Water - Conclusion). Please define the specific topic being referenced in the various conclusions presented here. The statement that surface water quality would "continue to decrease" must surely address a different subject from the statements projecting sediment and salt yields to continue at constant rates.

RESPONSE TO COMMENT 29

OFFICE OF SURFACE MINING, RECLAMATION AND ENFORCEMENT

[Comment page 2]

Page 2-62. The text of the draft has been revised to accommodate the suggestion to allow coal exploration activity (see revisions to draft table 2-7). However, coal leasing would not be allowed prior to conducting a coal unsuitability study and plan amendment (draft page 2-11).

Page 3-28. The text of the draft has been revised to expand the visibility discussion, as suggested in this comment (see revisions to draft page 3-28).

Page 3-54. The draft glossary has been revised to include the definition of "ecological site" (see revisions to draft page B-4).

Page 4-1. None of the alternatives assessed was found to have secondary impacts on wildlife resources. The effect of erosion from natural causes is recognized (draft pages 3-28 and 3-33), but is expected to be negligible by the year 2000 (the impact period used in the draft). Watersheds with significant soil erosion due to natural processes were identified as a component of the sensitive soil areas (draft page 3-33). No attempt was made to determine the rate of head cutting from either natural or cultural sources due to lack of inventory data; this would be a component of future activity planning (see draft page A-29).

Page 4-13. The intent was to project a continuing downward trend in water quality (or the degradation of water quality at a constant rate). Wording in the draft was revised for clarity (see revisions to draft pages 4-13 and 4-24).

Page 4-24, para. 3 (Soils - Impacts). Please expand this discussion to include the potential for disturbance of prime farmland by coal development. Table 3-5 (pages 3-34 and 3-35) suggests the presence of irrigated cropland in some soil map units; irrigated farmland that could constitute prime farmland. The leasing of Federal coal would require special consideration and handling of prime farmlands if they occurred within the proposed lease boundaries.

RESPONSE TO COMMENT 29

OFFICE OF SURFACE MINING, RECLAMATION AND ENFORCEMENT

[Comment page 3]

Page 4-24. Prime farmland would be considered when coal unsuitability studies are undertaken. The determination of prime farmland is a routine part of any project assessment. The text of the draft has been revised for clarity (see revisions to draft page 2-7).

COMMENT 30

STATE OF UTAH

NORMAN H. BANGERTER
GOVERNOR

OFFICE OF THE GOVERNOR
SALT LAKE CITY
84114

October 31, 1986

Ed Scherick
San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Dear Mr. Scherick:

The Resource Development Coordinating Committee has reviewed the Draft San Juan Resource Management Plan and Environmental Impact Statement. Based on that group's input, there follow the comments of the State of Utah. But, before a discussion of the document, I first want to thank you and your staff for involving the State in the planning process and for the extra effort expended to address the Committee personally. The Plan, in combination with the Management Situation Analysis, is impressive in the extent of information and analysis available concerning the resource area, and the variety of alternative strategies suggested for its management.

While the Plan represents a high point in the ever evolving sophistication of planning, there remain several areas that do not contribute to the Plan's overall quality. As elaborated on in the attached comments, the areas of cultural resources and special designations need to be re-evaluated before the preferred alternative would be acceptable to the State. Additionally, the preferred alternative is inadequate in its consideration of grazing management.

I hope that the attached comments will be useful to the BLM in developing the best plan possible to manage one of the most complex resource areas in the State. Again, thank you for the opportunity provided to be involved in the planning process.

Sincerely,

Norman H. Bangerter
Governor

NHB/ras

RESPONSE TO COMMENT 30 STATE OF UTAH, OFFICE OF THE GOVERNOR

[Comment cover letter]

BLM appreciates the State's support of the MSA and the draft RMP/EIS. See also comment 31, and the response, regarding the State's position on cultural resources, special designations, and grazing management.

COMMENTS OF THE STATE OF UTAH ON THE
DRAFT SAN JUAN RESOURCE MANAGEMENT PLAN AND EIS

I. General Comments

A. CULTURAL RESOURCES

There is no question that the San Juan Resource Area contains archaeological resources of regional, national and global significance. Nor is it questioned that these irreplaceable resources are at risk. Both the Draft Plan (DRMP) and the Management Situation Analysis (MSA) contain numerous references to the resource and the problem. The problem has become so acute that a special Governor's Task Force was established to address the issue. The question remains why cultural resources were not considered a planning issue when that is the most significant management problem the BLM has in this region.

BLM makes the distinction between a planning issue, a management concern, and those areas that will be managed the same under any alternative. Chapter 1 (page 1-1) identifies the criteria by which planning issues are identified. Cultural resource management appears to fit as a planning issue under several categories. For example, cultural resources "present major land use conflicts regarding management or maintenance of a base resource." Protection, management, maintenance of cultural resources may require exclusion or limitation of other resource uses such as grazing, oil and gas development, and recreational uses.

Additionally, cultural resource management "can reasonably be resolved in alternative ways by BLM field managers." While "the need for protection of these resources is established by law and is beyond the discretion of BLM field office personnel" (DRMP page 1-6), the degree to which the resource is protected beyond the requirements of the law is discretionary. There are instances throughout the Plan where BLM suggests management for cultural resources "to a greater extent than law requires" (DRMP, page 2-11). The question that must be examined and resolved is the "how" of protection. The Plan itself proposes various "hows." Table 2-5, page 2-56, identifies different management objectives for cultural resources based on the five alternatives; and, Table 2-7, page 2-69, identifies different management actions for cultural resources among the alternatives. Thus the Plan already proposes different management for cultural resources under the various alternatives.

A question is also raised as to the distinction made between management of cultural resources and other areas of management that were addressed as issues in the Plan. How is the area of cultural resource management different from any of the other areas that have been deemed to be planning issues? For example, BLM is also required to manage for wildlife habitat; but, the degree to which they provide habitat, beyond the requirements, is a matter for in-depth evaluation that balances the needs for wildlife habitat against other resource uses and protection. The same degree of evaluation should be afforded cultural resources.

RESPONSE TO COMMENT 30 STATE OF UTAH, OFFICE OF THE GOVERNOR

[Comment page 1]

General Comments

Cultural Resources. See comment 31, and the response, regarding the State's position on cultural resource management.

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion of the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

The draft provides for ongoing inventory of cultural resources (page 2-6) and the protection of cultural resource sites (appendix A). The draft (table 2-2) provides for nominations of specific cultural resource properties to the National Register. The draft also provides that cultural resource management zones would be established (page 2-6, 3-60, figure 3-15, and table 3-9); these zones are based on potential cultural resource values present. The draft identified areas where specific CRMPs would be developed (draft page 2-6 and table 2-7); these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29).

BLM has acknowledged that cultural resources are of high interest and has identified the area as one of "specific management concern." Based on the above discussion, the more appropriate category for consideration is that of an "Issue" which will provide the emphasis and special attention needed to fully evaluate this most critical and vulnerable area.

B. WATER QUALITY

It is suggested that future water quality monitoring activities be coordinated with either the Bureau of Water Pollution Control or the U.S. Geological Survey Water Resources Division. This coordination would allow water quality data to be entered into the STORET or WATSTORE systems. The data would then be available for all interested water quality agencies. Water quality concerns should be coordinated with Leah Ann Schirle, the areawide water quality manager for the Southeastern Utah Association of Local Governments.

C. RANGE CONDITION

From the discussion and evaluation of range condition in the DRMP, there appears to be some confusion between what might be classified as range condition for livestock and/or wildlife and ecological condition as discussed in Appendix T. Appendix T implies that as the vegetation of a given area approaches climax, thus an improvement in "ecological condition", that range condition also improves. However, on page 3-54 it is implied that the pinyon/juniper woodland is an area in poor range condition and that the area would need to be chained in order to provide the necessary forage for livestock. From an ecological standpoint the pinyon/juniper woodland, which characterizes much of the San Juan Resource Area (SJRA), could be considered in the climax stage. This confusion needs to be clarified in the final RMP.

D. SPECIAL MANAGEMENT DESIGNATIONS

The extensive and impressive menu of special management designations offered in the DRMP is reflective of the wealth of special resources the San Juan Resource area contains. Alternative E, however, falls short of using these designations to the extent necessary to responsibly acknowledge the resource base. The following indicates areas of support for, and difficulty with, Alternative E.

The State supports designation of Bridger Jack Mesa and Lavender Mesa as Research Natural Areas under Alternative E. The RNA category is more reflective of the function that the designation will serve than an ACEC designation. Designation of both areas provides an excellent opportunity to monitor the pinyon/juniper and sagebrush/grass ecosystems as neither are grazed by cattle and only Bridger Jack Mesa experiences use by deer.

Before all riparian/aquatic habitat areas in the SJRA are excluded from consideration as ACECs the significance of each area should be evaluated. While the areas are identified, there is no information provided as to the

[Comment page 2]

Water Quality. BLM has coordinated water quality monitoring activites with the Utah Bureau of Water Pollution Control and USGS for many years. Under a cooperative agreement, BLM collects water samples at designated sites and the Bureau of Water Pollution Control analyzes the samples and enters the data into the STORET system. BLM routinely contracts USGS to install and monitor the more intensive sampling sites (although this type of contracting use has been greater in the past than it is now). BLM also coordinates with Ms. Schirle of the Association of Governments, and received copies of the appropriate State Section 208 plans as part of the data for preparing this RMP/EIS. The text of the draft has been revised to reflect this coordination (see revisions to draft table 5-1).

Range Condition. See comment 31, and the response, regarding the State's position on grazing management. See also the response to comment 22, Environmental Protection Agency, comment page 3. The difference between ecological condition and livestock forage condition has been explained in the proposed RMP and final EIS (see revisions to draft glossary). See also response to comment 67, Rodney Greeno, on this topic.

Special Management Designations. See comment 31, and the response, regarding the State's position on special management designations. The proposed RMP provides for designation of several additional areas as ACECs (see revisions to draft chapter 2 and appendix I). The management provisions in appendix A (as revised) are believed adequate to protect natural resource values in SJRA.

BLM is phasing out the RNA designation and replacing it with the ACEC designation. Both Bridger Jack and Lavender Mesas are proposed for ACEC designation in the proposed RMP, but the reasons, and management prescriptions, are the same as given in the draft in support of the RNA designation.

BLM agrees that the riparian areas in SJRA are important, but did not find that on their own merits they qualify as ACECs (proposed RMP and final EIS appendix H). See also the response to comment 22, Environmental Protection Agency, page 5-6.

condition or value of the resource singly or as compared to the other riparian areas. The evaluation of Cajon Pond is the exception and the State supports the proposed 40 ACEC designation under Alternative E.

Alkali Ridge is recommended as an ACEC under Alternative E. The acreage to be designated is significantly less than that proposed under Alternatives C or D. Other than the statement that the 35,890 acres represents the "heart" of the area, no explanation is offered for the reduced acreage. The MSA documents the serious impacts that are affecting the entire area (MSA page 4331-30) and the irreparable damage that is occurring. Is the ACEC proposed under Alternative E adequate to protect the resource?

The same question is raised in regards to the ACEC proposed for the North Abajo zone. Out of 65,450 acres identified in the MSA as containing cultural resources that are regarded as regionally and nationally important--irreplacable and extremely vulnerable, only 1,770 acres in Shay Canyon are recommended for designation in Alternative E. The MSA states that "irreparable damage to the cultural values here can be prevented only by maintaining the area in its relatively primitive state" (MSA, page 4331-28). Again the question is asked, is the designation of 1,770 acres adequate to protect the resource?

The lack of rationale for exclusion of the Outstanding Natural Areas (ONA) identified in the DRMP, from Alternative E, is conspicuous in its absence. Lime, Road, Fish and Owl, and Mule Canyons are all Wilderness Study Areas and have been identified as possessing outstanding natural values. It is perhaps important to consider the results of a recent public opinion survey of Utah citizens which showed that 88.9% of all Utahns agree or strongly agree that areas with unique wilderness values--like natural beauty, isolation or primitive qualities--should be protected, even if they are not designated wilderness. Of those Utahns who reside in southern and southeastern Utah, 84.9% agreed or strongly agreed with that statement. In BLM's efforts to assess future management for areas not designated wilderness, the results of the survey should be kept in mind--special areas should be given special management protection. Will these areas be appropriately managed under the preferred alternative given their outstanding resource values?

While Lime, Road, Fish and Owl, Johns, Slickhorn, Mule and Arch Canyons are included in a SRMA under Alternative E, no special consideration was afforded Mancos Mesa WSA or Cheesebox Canyon WSA--and no explanation was offered for the exclusion. How will the special resource values identified throughout the wilderness review process for these WSAs be protected?

There is also no justification provided for eliminating Beef Basin, Indian Creek Canyon and Montezuma Creek potential National Register Eligible Archaeological Districts from the preferred alternative. Beef Basin and Indian Creek Canyon have been included in a proposed SRMA under Alternative E. Given the recommendation in the MSA that both areas will

[Comment page 3]

BLM appreciates the State's support of the Cajon Pond potential ACEC; however, under the proposed RMP, this area would be managed as a 10-acre special emphasis area within the Hovenweep proposed ACEC (appendix H, as revised).

BLM believes the smaller Alkali Ridge proposed ACEC would be adequate to protect cultural resource sites present (appendix H, as revised).

BLM also believes the Shay Canyon proposed ACEC would be adequate to protect cultural resource sites present (appendix H, as revised).

Appendix H has been revised to provide a more complete rationale as to why the ONA designation was not carried forward into alternative E in the draft. BLM is phasing out the ONA designation in favor of the ACEC disignation. The areas mentioned in this comment, proposed as ONAs under alternatives C and D of the draft, all fall within the proposed Cedar Mesa ACEC under the proposed RMP and would be managed to protect natural values present (see revisions to draft chapter 2 and appendixes A, H, and I.

The areas covered by the Mancos Mesa and Cheesebox Canyon WSAs are recognized in the preferred alternative as having significant recreational and wildlife values. These values would receive special protection through the special conditions developed to protect P and SPNM ROS classes and crucial bighorn sheep habitat (draft appendix A). Additionally, under the proposed RMP, part of the Cheesebox Canyon WSA falls within the proposed Scenic Corridor ACEC, and would be managed for scenic values.

Regarding potential National Register archaeologic districts, BLM would manage properties eligible for listing on the National Register under the same protective stipulations as sites already listed (draft pages 2-6 and A-27).

need "particular management consideration to ensure continued protection if the areas are not designated as wilderness"(MSA, pages 4331-21 and 4331-26), is the SRMA designation adequate?

The State also has concerns about the SRMA designation generally. While it is understood that many of the specific details of management for specially designated areas will be identified in future activity plans, it would nevertheless be extremely helpful if BLM could detail the various restrictions and management actions that could be expected under the various designations. It is not clear in the document as to how SRMAs will be managed differently from ACECs or ONAs. Are they so different as to be distinguishable? It would perhaps be less confusing to use only the ACEC designation with more details as to how prescriptions for each ACEC would be tailored to fit the special needs of each area.

Finally, there is also no justification for not including the Davis Canyon Archaeoastronomy site, the Moon House Ruin and the Shay Canyon Petroglyph site as potential National Register Eligible properties as indicated in Table 2-2 of the DRMP. These areas would all be less than one acre and could not be construed to be excessive withdrawals.

The above examples are indicative of the need to review the special management considerations proposed under the preferred alternative. The Resource Area has certainly made great strides in using these special designations; but, it has not gone far enough given the extraordinary resource base. The publication, Recent Proposed Revisions to Guidance for Identification, Evaluation and Designation of Areas of Critical Environmental Concern and Changes to BLM Manual Section 1617 (September 1986) underscore the importance this process of identification and designation of ACECs is suppose to have in the planning process. Proposed changes to Section 1617 state that "All potential ACEC's are included in the preferred alternative unless there is a clear and documented reason not to do so." Two valid reasons not to include all potential ACECs are 1) exposure to risks of damage or threat to safety; and, 2) no reasonable special management actions which can be taken to protect the resource from irreparable damage or to restore it to a viable condition. While still proposed changes to existing guidance, they nevertheless reflect a spirit which is lacking in Alternative E. Perhaps this subtle deficiency can best be illustrated by a final example. Lockhart Basin was identified as a potential ACEC to protect scenic values that are unique or very rare within its physiographic province. The ACEC was not included in the preferred alternative and no explanation was offered for its exclusion. BLM needs to rework the special designation section of the DRMP/EIS.

E. ALTERNATIVES

Generally, while a full range of reasonably implementable alternatives are developed for BLM management plans, there is usually one alternative that provides a more equal balance in allocating resources than the others. In the San Juan DRMP that alternative is missing. Alternative E

[Comment page 4]

SRMA designation is aimed at providing activity-level management of recreational uses, not at managing National Register properties. BLM is confident that SRMA designation would be appropriate and adequate for the area mentioned in this comment. In the proposed RMP, three smaller proposed SRMAs have been combined into the Canyon Basins Proposed SRMA (see revisions to draft table 2-3).

The SRMA is a tool used to manage recreational uses of public lands. The areas will generally be managed under the special conditions presented in the RMP, including those to maintain ROS classes. Further refinement would be done at the activity planning phase (draft appendix B). The draft presented management prescriptions for each area considered for special designation (draft appendix A and I). BLM agrees that the differences between the ONA and ACEC designations are confusing; as noted above, BLM is phasing out the ONA designation in favor of the ACEC designation.

See comment 31, and the response, regarding the State's position on cultural resource management. As noted in this comment, the draft (table 2-2) provides for nominations of specific cultural resource properties to the National Register. However, it is not cost-effective for BLM to nominate individual cultural properties to the National Register. Anyone, including the commentor, can nominate cultural sites to the National Register. BLM manages sites that are potentially eligible for listing in the same way as it manages sites that are listed on the National Register (draft page 2-6).

See comment 31, and the response, regarding the State's position on special management designations. ACEC designations considered in the draft were prepared on the basis of existing guidance contained in BLM manual 1617.8, and not on the basis of draft guidance being circulated for agency and public review. This RMP/EIS is not an appropriate forum in which to discuss the pros and cons of the draft guidance.

BLM has revised draft appendix H to provide a more complete rationale as to the disposition of potential and preliminary potential ACECs. In response to a nomination in another comment, the lower Indian Creek drainage, which is part of the Lockhart Basin potential ACEC mentioned in this comment, has been proposed for ACEC designation in the proposed RMP (see the response to comment 2, National Parks and Conservation Association).

Alternatives. BLM is confident that draft alternative E (the preferred alternative) provides for a balance of allocation of resource uses.

attempts to hit the balance mark but falls short in several areas. Two of the preferred alternative's weakest elements are discussed above: cultural resources and special management designations. Alternative E has largely ignored cultural resource management, it is not even mentioned as part of the management goals (DRMP, page 2-15). As discussed above, for Alternative E to be acceptable to the State, cultural resources should be re-evaluated as a planning issue and the special management designations re-evaluated.

What Alternative E has provided is an avoidance of making any changes in grazing management. It is understood that no changes can be made until 5 years of monitoring has elapsed. However, given the condition of the range it is clear that some modifications will need to be made in the future. It seems to be a misplaced goal that insists upon "grazing use...maintained at existing levels" (DRMP, page 2-15). At best this statement is a poor choice of words and at worst the admission that livestock is driving the planning process instead of an evaluation of all multiple uses.

Range in a deteriorated condition not only results in decreased forage for livestock but also contributes to a host of other problems such as soil erosion (which affects salinity levels in the Colorado). But instead of acknowledging the need for modifications, BLM heads in the other direction suggesting that the SJRA can "meet the demand for full active preference (79,098 AUMs)" (DRMP, page 3-57) while licensed use (54,844 AUMs) is keeping many of the allotments in unsatisfactory range condition. The BLM needs to reassess the issue of livestock and prepare a preferred alternative that does not accommodate livestock at the expense of wildlife, riparian ecosystems, water quality and cultural resources.

II. Specific Comments

A. CHAPTER II COMMENTS

Page 2-8, Habitat Management: BLM is responsible for providing adequate life requisites (food, water, space and cover) for all native and other desirable wildlife species within the San Juan Resource Area (SJRA), and not just major species. This section should also mention fish species and their respective habitat needs.

Page 2-12, Alternative A, Vegetation Management: BLM has legal responsibilities to properly manage watersheds and riparian areas that would include limiting livestock use when necessary. Note, that riparian areas are a wetland (scrub shrub and forested classes of the palustrine system as classified by the U.S. Fish and Wildlife Service) and are protected by the Clean Water Act as well as Executive Orders No. 11990 and 11988. Protection of riparian and other wetland areas, even to the detriment of livestock use, is a legal mandate. Alternatives that would

[Comment page 5]

See comment 31, and the response, regarding the State's position on cultural resource management. The management guidance common to all alternatives for cultural resource management (draft page 2-6) provides for a base level of management for cultural resources; the management options described in the different alternatives are in addition to that base level. The management goals for the preferred alternative have been revised to reflect the changes made in the proposed RMP (see revisions to draft page 2-15). Cultural resource management is reflected in the revised goals. Livestock allocations were one of many factors driving the priorities under the preferred alternative.

See comment 31, and the response, regarding the State's position on grazing management. Under the preferred alternative, grazing management would be more intensive and would include the development of 21 additional AMPs and the revision of 9 existing AMPs. These would provide management measures to improve plant vigor and density by providing periodic rest for plants during critical plant growth periods. BLM does not consider the range to be in a deteriorated state (see the response to comment 67, Rodney Greeno, on this topic). BLM is confident that the preferred alternative provides adequate protection for wildlife, particularly in crucial habitat areas (draft appendix A).

Specific Comments, Chapter 2

Page 2-8, Habitat Management. BLM recognizes the need to provide for habitat considerations for all wildlife species. The text of the draft has been revised to clarify this point (see revisions to draft table 2-5). The development of HMPs, however, will be limited to consideration of the habitat needs for the big game species listed. Fish species and their habitat needs are included in the discussion of aquatic habitats. See draft page 3-42 et seq. for a description of wildlife species in SJRA.

Page 2-12, Alternative A, Vegetation Management. BLM is aware that certain management responsibilities under laws, executive orders, and regulations would not vary between alternatives (draft page 2-1). The requirements for management of floodplains and wetlands under law and executive orders are given on draft page 2-8.

damage riparian/wetlands seem to be inappropriate.

Page 2-13, Alternative B, Wildlife Habitat Management: It is unacceptable for BLM to allow deterioration of habitat for minerals production without acceptable mitigation.

Page 2-13, Alternative C, Vegetation Management: A wide array of exotic vegetation species have proven to be beneficial for reclamation purposes. Many exotics are cheaper, readily available, more easily established and equal or better in palatability as well nutritional value than native species. Modern day resource managers should not limit the tools and technology available to achieve reclamation success. Therefore, exotic vegetation should be considered along with native vegetation in reclamation prescriptions. This comment applies to other areas of the DRMP/EIS where the reclamation issue is raised.

Degradation of riparian/wetlands by recreational pursuits is no more acceptable than degradation by livestock. BLM is legally mandated to protect wetlands, which would include riparian areas, by Executive Order No. 11990. Reference comments for page 2-12. (This part of the DRMP is inconsistent with the direction identified on page 2-88, "protection of riparian vegetation.")

Page 2-15, Alternative D, Wildlife Habitat Management: It would be desirable to let natural succession result in a climax vegetation community in desert bighorn sheep use areas. Many of the other areas should be managed for some successional stage other than climax.

Page 2-16, Alternative E, Livestock Management: The Indian Creek riparian zone would greatly benefit from exclusion of livestock grazing. The State would support that management action.

Page 2-16, Alternative E, Vegetation Management: It is inappropriate to protect only certain riparian areas. Executive Order 11990 directs protection to all wetlands.

Page 2-16, Alternative E, Wildlife Habitat Management: BLM would be remiss in their responsibilities only to provide management for wildlife habitat where livestock would not be affected.

Page 2-58, Endangered Species Management: In order to fully comply with the Endangered Species Act, BLM must advantage every reasonable opportunity to increase populations of T & E species. Such an intent is only expressed in Alternatives C, D and E.

Page 2-74, Table 2-8: ORVs should be excluded from riparian zones under all 5 alternatives.

Pages 2-76 through 91, Table 2-9: Much of the Table is too vague to allow for evaluation. For example (page 2-76, Alternatives A, C, D and E)

[Comment page 6]

Page 2-13, Alternative B, Wildlife Habitat Management. Under alternative B, habitat management would have a lower priority than livestock grazing or minerals development. This was not selected as the preferred alternative.

Page 2-13, Alternative C, Vegetation Management. BLM agrees that many species are useful for reclamation. Native species are specified where needed to maintain certain types of ecosystems or certain visual qualities. Resources would be managed in accordance with law, executive orders, and regulations under every alternative. Alternative C would not allow degradation of riparian areas in violation of the executive orders cited.

Page 2-15, Alternative D, Wildlife Management. Under alternative D, vegetation over much of SJRA would be allowed to achieve natural succession without human interference. This was not selected as the preferred alternative.

Page 2-16, Alternative E, Livestock Management. After the draft was published, BLM participated in an interagency tour of the upper Indian Creek drainage; livestock use was not found to be causing significant adverse impacts (see revisions to draft page 5-2). If partial exclusions become necessary, they will be handled through AMPs or activity planning.

Page 2-16, Alternative E, Vegetation Management. Resources would be managed in accordance with law, executive orders, and regulations under every alternative. Draft alternative E would apply additional protection to certain riparian areas defined in appendix A (the upper Indian Creek drainage, discussed above, and the potential Cajon Pond ACEC, which is absorbed into the proposed Hovenweep ACEC). This requirement no longer applies, and the text has been revised accordingly (see revisions to draft page 2-16).

Page 2-16, Alternative E, Wildlife Habitat Management. The statement cited presents a resource trade-off, considered under this alternative, that in certain big game habitat areas (defined in appendix A) livestock use would defer to management for the wildlife; in the remainder of SJRA, wildlife habitat would not be managed at the expense of livestock uses.

Page 2-58, Endangered Species Management. The management objectives have been revised as suggested (see revisions to draft table 2-5).

Page 2-74, Table 2-8. The draft applied the least restrictive management needed to resolve resource conflicts (see the response to comment 2, National Parks and Conservation Association). Areas would not be closed to ORV use if a lesser restriction would suffice. ORV designations vary among alternatives because the goals are different (draft table 2-8, appendix A).

Pages 2-76 through 2-91, Table 2-9. For these phrases, the "certain" areas for deer, the five mesa tops, the "certain" wildlife habitats, and "crucial habitats" are identified in appendix A; these terms are consistently used according to their defined meaning throughout the RMP/EIS.

"Areal allotments of forage - certain areas to deer" and (page 2-76, Alternative C and E) "Livestock exclusions - Wingate Mesa and other identified mesa tops." The "certain areas to deer" and "other identified mesa tops" need to be specified. On page 2-88, Alternative E, what are the "certain wildlife habitats and watershed values" to be increased through riparian management? Lack of specificity makes it impossible to compare "crucial habitat protection" between Alternatives C and E on page 2-89.

Page 2-76, Livestock Exclusions: In every case, it is recommended that livestock exclusion areas identified for Alternative E be utilized along with exclusion of livestock use in riparian areas.

Page 2-77, Wilderness Study Area Management: The following WSAs or portions of WSAs support populations of desert bighorn sheep: Dark Canyon WSA, Mancos Mesa WSA (partial 46,120 acres), Grand Gulch WSA Complex (partial 37,580 acres), Cheesebox Canyon WSA (all wilderness) and Indian Creek WSA (all wilderness). To best advantage the sheep populations the areas should be managed as unroaded, restricted to mineral entry and livestock use excluded. Natural succession of vegetation should be allowed to progress to climax ecological conditions.

Page 2-88, Table 2-9, Wildlife Habitat Management: The DRMP should identify a protective buffer zone of 0.5 mile radius surrounding raptor nests during their active period. Maintenance of an acceptable density of "snag trees" should be addressed also, as well as protection of critical valued use areas from road, or other surface facility developments.

Page 2-91, ORV Use Designations: Each alternative should include restrictions that prohibit ORV use and industrial complexes or field camps out of a 0.25 mile radius buffer zone surrounding seeps, springs or developed wildlife water sources.

B. CHAPTER III COMMENTS

Page 3-10, Paragraph 4: The potential for the existence of tar sand deposits in the White Canyon Slope area is discussed. The statement is made that "Because the White Rim has not been breached by erosion, the existence of a tar sand field as large as the Tar Sand Triangle is remotely possible, but there is no evidence from which to work."

The extent of the Tar Sand Triangle is unknown. Recent estimates have revised downward previous estimates. Even those previous estimates had some drill hole data and physical evidence for the existence of tar sands from which to work. The above quoted statement has no physical evidence to indicate the existence of any tar sands in the White Canyon Slope area, which would argue against the suggestion made here that it could be a resource as large as the Tar Sand Triangle. All that can be said, given the facts, is that any potential for tar sands is completely unknown.

[Comment page 7]

Page 2-76, Livestock Exclusions. See comment 31, and the response, regarding the State's position on grazing management. BLM appreciates support for the livestock exclusions shown in the preferred alternative. Livestock exclusions are different under the various alternatives to meet the differing management objectives. Under the preferred alternative, livestock would not be excluded from riparian areas through the RMP; the reference to this in appendix A was in error (see revisions to draft page A-20).

Page 2-77, Wilderness Study Area Management. See comment 31, and the response, regarding the State's position on management of WSAs, and of bighorn sheep populations within these areas. As noted, the San Juan RMP addresses management of areas under wilderness review if these areas are dropped from consideration for wilderness designation by Congress (draft page 1-2).

Page 2-88, Table 2-9, Wildlife Habitat Management. Harvest of fuelwood in SJRA is limited to pinyon and juniper (draft page 2-5); snags would not be legally harvested. The RMP is used to make broad land-use allocations. Because raptor nests are small and their locations or use could vary over time, establishing buffer zones around current nests through the RMP would have limited value. This type of consideration is made through the NEPA documents prepared at the time a project is proposed (draft pages 2-1, A-1 and A-29). Protected raptors would be managed in accordance with T/E species laws (draft page 2-8).

Page 2-91, Table 2-9, ORV Use Designations. See the response to the comment regarding page 2-74, table 2-8, above.

Specific Comments, Chapter 3

Page 3-10, Paragraph 4. The discussion regarding occurrence of tar sand, cited in this comment, was based on geologic inference. The text states that in the White Canyon Slope area, potential for tar sand occurrence is completely unknown (draft page 3-10). The text of the draft has been revised to clarify this point (see revisions to draft page 3-17).

Page Eight
Attachment

Page 3-38, Paragraph 3: Forest resources within the SJRA may be of only incidental value as traditional economic forest products, but they are of significant biological value to wildlife. Many represent critically valued winter use areas for big game animals and riparian woodlands are of significant value to all of a local area's wildlife.

Page 3-41, Wildlife, Paragraph 1: The document suggests that BLM only manages for major big game species, of which elk were excluded, riparian habitat and T & E species. The Division of Wildlife Resources is of the opinion that BLM is legally bound to effectively manage for all wildlife within the SJRA as well as their habitats.

Elk are a significant element of the big game population associated with the SJRA. The DRMP/EIS should acknowledge this situation and be modified appropriately to address elk management.

Also, existing and potential warm water fishery resources are not addressed but should be.

Page 3-41, Wildlife, Paragraph 2:- The DRMP should indicate that the Colorado squawfish, humpback chub and bonytail chub, each of which are federally listed as endangered, inhabit the San Juan, Colorado and Green Rivers.

Peregrine falcon sightings within the SJRA are numerous and wide spread. Many are made during winter periods, but sightings do occur during this species' nesting period, also.

Although blackfooted ferrets have not been verified within the SJRA within recent years, a specimen was taken from the Baylis Ranch approximately four miles south of Blanding in the early 1950's. It is not unreasonable to suspect that blackfooted ferrets still persist within the SJRA.

Page 3-41, Wildlife, Paragraphs 3 and 4: BLM is an integral part of the Board of Big Game Control's Interagency Committee. Concerning big game, BLM is equally responsible along with the USFS and DWR for hunting management recommendations.

Page 3-41, Desert Bighorn Sheep, Paragraph 2: The DWR calculates 791,655 total acres (1,320,600 MRP data) of use area for bighorns, including NPS Lands, in the SJRA. Also, note that there exists substantial intolerance by desert bighorn sheep of livestock. This represents a behavior reaction, not to mention competition for forage, and avoidance of disease transmission where use may overlap.

Page 3-42, Pronghorn Antelope, Paragraph 1: Substantial archaeological evidence shows that antelope inhabited all suitable areas of the SJRA including Hatch Point prior to the advent of whitemen in the 1800's.

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[Comment page 8]

Page 3-38, Paragraph 3. The text has been changed to indicate that other values of forest resources are in addition to consumptive uses (see revisions to draft page 3-38).

Page 3-41, Wildlife, Paragraph 1. The text has been changed to clarify BLM's current management emphasis (see revisions to draft page 3-41).

BLM chose not to address elk wintering on public lands in SJRA because only about 25 animals are involved (MSA page PP-69). When the elk population on public lands increases to the point that management of their habitat in SJRA becomes a concern, the RMP would be modified as necessary (draft page A-30). (See also the response to comment 23, Forest Service, Manti-LaSal NF, on this topic.)

Warm and cold water fisheries would be addressed as part of the riparian/aquatic habitat areas, addressed throughout the RMP (draft page 3-52, for example).

Page 3-41, Wildlife, Paragraph 2. T/E wildlife species, including the fish, peregrine falcons, and black-footed ferrets mentioned in this comment, are discussed on draft page 3-52.

Page 3-41, Wildlife, Paragraphs 3 and 4. The text has been changed as suggested (see revisions to draft pages 3-41, 5-8 and 5-9).

Page 3-41, Desert Bighorn Sheep, Paragraph 2. BLM's acreage estimates are based on mapped data regarding the range of these animals. UDWR assisted in providing information as to the extent of habitat. BLM will continue to use the figures in the draft unless data are provided to substantiate the lesser acreage suggested in this comment. Sources used by BLM [King and Workman, 1983] indicate that, although bighorn sheep and cattle are socially intolerant (draft page 3-42), there is currently no competition between cattle and bighorn sheep in SJRA (draft page 3-58). BLM knows of no instances of disease transmission from cattle to bighorn sheep within SJRA and would be glad to review any information available.

Page 3-42, Pronghorn Antelope, Paragraph 1. BLM is not aware of any "substantial archaeological evidence" to support this statement. A few dry caves on both sides of the Colorado River (not Hatch Point) have evidence of antelope remains. Regardless, this would not affect current planning decisions.

Page Nine
Attachment

Page 3-45, Figure 3-12: The area denoted as deer yearlong habitat reflects a composite of high-priority valued summer and winter range and not the distribution area of deer herd Unit 31. This denoted area is not yearlong habitat. The critical valued use areas are in substantial error as compared to the use demonstrated by the deer and monitored by DWR. The DRMP/EIS needs to be corrected to reflect this situation.

The riparian/aquatic habitats identified on the map certainly do not reflect that total resource in the SJRA. The map and text of the DRMP/EIS must be modified to fully explain what is being presented relative to riparian/aquatic habitat.

Page 3-49, Deer, Paragraphs 1, 2 and 3: Deer herd Units 31-A and 31-B total 3,300,478 acres (1,839,000 MRP data) of which 230,400 (222,700 MRP data) are high-priority summer range, 1,779,454 (1,616,400 MRP data) are high-priority valued winter range, and 1,290,624 are ranked as limited valued yearlong range. The 1,000 acres of summer range lying on BLM lands are ranked as being of high-priority value and 305,280 (197,550 MRP data) acres of the winter range are of critical value. The DRMP needs to be corrected to reflect this situation. (Note that DWR figures reflect total acres regardless of land ownership.)

Page 3-52, Riparian and Aquatic Habitats, Paragraph 2: Catfish along with a host of other game and nongame fish are found in the Colorado River as well as San Juan River.

Page 3-52, Threatened and Endangered Animal Species, Paragraph 4: Would it be reasonable for BLM to administer protective leasing stipulations along the San Juan River to more closely coincide with bald eagle habitat areas?

Page 3-52, Threatened and Endangered Animal Species, Paragraph 5: Peregrine falcon aeries are known along Lake Powell (San Juan Arm and Colorado River Arm).

Page 3-53, Specific Indicators Affected: The entire wildlife resource (animals and habitat) could be affected by alternatives described in Chapter 2 and not just those listed.

Page 3-54, Grazing, Last Paragraphs: Maintenance of chainings and seedings need to be such that wildlife interests are a consideration. Such was not the case in the original planning for many of these projects.

Page 57, Grazing, Paragraph 8: Paragraph 8 states that "the SJRA can produce forage sufficient to meet the demand for full active preference (79,098)." We doubt that sufficient forage could be produced to meet full active preference simply by implementing AMPs without vegetative manipulation.

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Page 3-45, Figure 3-12. The "yearlong" deer habitat (draft page 3-49) is mislabeled; the legend of this figure has been changed accordingly (see revisions to draft figure 3-12).

BLM used information provided by UDWR to map the crucial habitat areas shown in figure 3-12 (draft page 3-49) and to estimate acreages. UDWR is expected to update this information. The special conditions to protect crucial habitat would be adjusted accordingly (draft appendix B).

Major riparian/aquatic habitats are shown in the draft (figure 3-12 and table 3-6, as revised). Small or isolated riparian areas are not shown at this scale. The definition of riparian area has been changed (see revisions to glossary).

Page 3-49, Deer, Paragraphs 1, 2, and 3. BLM used information provided by UDWR to map habitat areas and estimated acreages for public lands. The areas could be remapped if the animals move to different areas.

Page 3-52, Riparian and Aquatic Habitats, Paragraph 2. Catfish are discussed on draft page 3-52.

Page 3-52, Threatened and Endangered Animal Species, Paragraph 4. Chapter 3 of the draft presents the current situation. Leasing categories along the San Juan River have been adjusted under the different alternatives. The proposed plan would impose a no-surface-occupancy restriction to protect bald eagle habitat in this area.

Page 3-52, Threatened and Endangered Animal Species, Paragraph 5. The locations cited are apparently not on public lands. The text has been revised to indicate known sites within Glen Canyon NRA.

Page 3-53, Specific Indicators Affected. The impact analysis of an EIS is confined to facets of the human environment that would be significantly affected (draft pages 3-1, 4-2; 40 CFR 1502.3, 1508.27). The indicators listed are those that would be significantly affected and for which the effects could be projected.

Page 3-54, Grazing, Last Paragraph. See comment 31, and the response, regarding the State's position on grazing management. Seeding maintenance projects on public lands have some mitigations for wildlife. BLM biologists and UDWR have been consulted when designing maintenance projects.

Page 3-57, Grazing, Paragraph 8. See comment 31, and the response, regarding the State's position on grazing management. It was assumed that grazing systems and associated range improvements would allow better use of existing forage and improve forage density and vigor. Range improvements such as waters and fences would allow use of presently unused areas and would result in a more even utilization level of forage. Maintaining existing seedings without implementing new land treatments was considered necessary in the assumption that SJRA can produce forage to meet full active livestock preference.

Page 3-79, San Juan Extensive RMA, Paragraph 6: Trapping of mountain lion is illegal.

C. CHAPTER IV COMMENTS

Page 4-2, Analysis Methods, Paragraph 2: The elimination of visitor use days in the EIS is questioned. They may be far more accurate than the figures assumed for sites/square mile, percentage of damaged sites, etc. Inclusion of these figures which show 6,444 visitor days at Mule Canyon Indian Ruins, 3,910 visitor days at Butler Wash Indian Ruins, and a total of 17,521 visitor use days in the Grand Gulch PA during 1984, should be allowed to stand as evidence of use and an indication of possible tourism dollars added to the local economy. This type of information would be valuable to compare against grazing figures of 58 licensed livestock operators, accounting for 402 jobs and 3% of the local income in 1982 (MSA, page 4322-21 through 25).

Page 4-7, Assumptions, Paragraph 7: Is it realistic to assume that 10,800 acres will be treated given the problem of chaining in areas that have such a high concentration of cultural sites?

Page 4-8, Mineral Components, Paragraph 2: Seasonal wildlife restrictions on mineral activities have only been oriented to exploration and mineral claim assessment work. No stipulation has ever affected an operating facility. In-the-field activity has not been stifled by wildlife nor exploration/production costs substantially increased. Undoubtedly, industrial developers have had to become involved with planning which is to the benefit of all resource management.

Page 4-13, Vegetation, Paragraph 4: Implementation of existing AMPs would not necessarily result in higher seral stages thus producing more forage for livestock.

Page 4-15, Wildlife: The function of the Board of Big Game Control's Interagency Committee, of which BLM is a member, is to manage big game populations so that they can expand to the carrying capacity of the range. Under proper livestock management, such would allow the deer population to reach its full potential.

Page 4-16, Impacts on Cultural Resources: Paragraph four states that it "was assumed that all sites in these areas would be protected." This appears to contradict the statement made in the first paragraph that "Adverse impacts...are residual and occur despite management efforts to mitigate them through Section 106 of the National Historic Preservation Act...".

Page 4-38, Wildlife, Paragraph 4: Impacts to any high interest species that result in loss of habitat in critical valued areas must be mitigated on an acre-for-acre basis. BLM should respond to all such problems and not

[Comment page 10]

Page 3-79, San Juan Extensive RMA, Paragraph 6. The text has been changed to correct the error cited (see revisions to draft page 3-79).

Specific Comments, Chapter 4

Page 4-2, Analysis Methods, Paragraph 2. Visitor use data, if available, could be useful in projecting impacts. However, as stated in the draft, these data were not consistently available for public lands in SJRA, and could not be projected because of the many factors involved (draft page 4-2).

Page 4-7, Assumptions, Paragraph 7. The treatable acreage is considered realistic: 10,800 acres were assumed to be actually treatable, after exclusions are made for poor soils, cultural sites, visual resources, and wildlife habitat needs (draft appendix X). The referenced paragraph on page 4-7 indicated an incorrect acreage and has been revised (see revisions to draft page 4-7); however, the analysis numbers were correct.

Page 4-8, Mineral Components, Paragraph 2. The referenced existing seasonal stipulations apply only to oil and gas leases, not to mining claim assessment work. BLM does not agree that stipulations do not affect an operating mine.

The effect of the seasonal stipulations for mineral leases is particularly evident when a company drills just prior to the restricted season, makes a producing well, and wants to construct a pipeline tie-in but is not allowed to do so because of the stipulations. The company is then faced with increased costs of trucking the product.

Page 4-13, Vegetation, Paragraph 4. The section on ecological condition has been revised (see revisions to draft appendix T). It is expected that grazing management under AMPs would result in more livestock forage production, but not necessarily a higher seral stage. See comment 31, and the response, regarding the State's position on grazing management.

Page 4-15, Wildlife. Livestock grazing does not presently limit the deer population, but the referenced discussion projects the potential for conflicts if (1) livestock grazing continues at the present level and (2) deer populations continue to increase. See comment 31, and the response, regarding the State's position on grazing management.

Page 4-16, Impacts of Cultural Resources. See comment 31, and the response, regarding the State's position on cultural resource management. Impacts to cultural resources were determined separately for sites damaged and sites protected (draft page 4-16 and appendix Y). The referenced statement states that it was assumed that all sites within special cultural properties (draft table 3-8) and within the Grand Gulch Plateau SRMA would be protected, not that all sites in SJRA would be protected.

Page 4-38, Wildlife, Paragraph 4. The RMP is intended to provide planning decisions on a large scale, not site-specific impacts from individual projects. The 10-acre figure is a threshold level. BLM agrees that impacts to high-interest species must be mitigated.

just when 10 acres have been damaged. This comment would apply regardless of the alternative selected.

Page 4-69, Paragraph 2: It is stated that the number of cultural resource sites protected would increase by approximately 10% because of restrictive conditions protecting sites within National Register cultural properties, districts or eligibles and ACECs. The NRHP does not have restrictive conditions that protect sites.

D. APPENDICES COMMENTS

Page A-5, Cultural Resources, Paragraph 1: It is stated that both direct and indirect damage to National Register properties and archaeological districts and eligibles will be avoided to the extent possible without curtailing "valid rights." Who makes this determination?

Pages A-10 and A-11, Wildlife: Regardless of the alternative selected by BLM, identical mitigation stipulations identified for Alternative C should be incorporated. Similar recommendations are made for floodplains and riparian mitigation stipulations on Page A-15 identified under Alternative D. Also provide mitigation stipulations identified on Page A-23 for "Upper Indian Creek Riparian Area" and "Cajon Pond ACEC."

Page A-72 through A-74, Wildlife Habitat Management: Same comment as provided for on page A-10 and A-11.

Page A-105, Habitat Management Plans: There is a serious need for development of HMPs on all high-priority valued wildlife use areas. Additionally, existing HMPs need to be updated and fully implemented.

Pages A-109-120, Table AO-1: An analysis of data presented in Appendix O and Table 3-6 relative to livestock use and riparian areas indicates substantial inconsistency within the DRMP/EIS. Table AO-1 shows 452 of BLM's 481 miles of riparian areas lie in allotments with unsatisfactory range conditions. Table 3-6 shows only 383 of BLM's 481 miles of riparian where livestock are a conflict. This situation needs to be clarified.

BLM should modify livestock management such that all riparian areas are improved to a "maintain" category. Currently only 5% of the riparian miles lie in allotments with such a classification. This percentage seems to indicate that current BLM management style is contrary to Executive Order 11990 for protection of wetlands.

Page A-121, Grazing Allotment Management Plans: Unsatisfactory range conditions over 95% of the SJRA are in part due to failure to fully implement existing AMPs. Additional AMPs need to be developed and implemented, also. Such action along with appropriate livestock reductions and season-of-use adjustments should substantially improve range conditions.

[Comment page 11]

Page 4-69, Paragraph 2. BLM applies restrictions to protect all sites listed, or eligible for listing, on the National Register (draft pages 2-6 and A-5; appendix A).

Specific Comments, Appendixes

Page A-5, Cultural Resource, Paragraph 1. Valid rights are determined by the laws and regulations that apply to a given public land use. The Area Manager would determine what valid rights might apply in a given situation, subect to standard administrative review procedures (43 CFR 4).

Pages A-10 through A-11, Wildlife (Appendix A). Because the mangement priorities are different for the different alternatives, the special conditions developed under alternative C do not necessarily support the preferred alternative. The special conditions for the upper Indian Creek drainage and the Cajon Pond area (page A-23, mentioned in this comment) have been revised.

Pages A-72 through A-74, Wildlife Habitat Management (Appendix H). This appendix discusses the potential of different areas for ACEC designation and provides management prescriptions, as does appendix A (discussed above).

Page A-105, Habitat Management Plans (Appendix N). This appendix discusses the status of exisitng HMPs (draft page A-105), not the need for possible additional HMPs. The alternative management prescriptions (draft table 2-7) discuss the need to modify the HMPs to meet program objectives.

Pages A-109 through A-120, Table AO-1 (Appendix O). See comment 31, and the response, regarding the State's position on grazing management. Table 3-6 shows conflicts presently occurring within specific riparian areas; table AO-1 shows how many miles of riparian habitat fall within each grazing allotment. The grazing allotment category applies to the whole allotment. Presence of a riparian area within a grazing allotment does not imply that there is a conflict between livestock management and the riparian habitat.

This comment's suggestions regarding reclassification of riparian areas to the M category would not comply with BLM's categorization system (draft appendix D), and would not achieve the results indicated in this comment.

Page A-121, Grazing Allotment Management Plans (Appendix P). See comment 31, and the response, regarding the State's position on grazing management. The draft does not state that 95 percent of SJRA is in unsatisfactory range condition (refer to the response to comment 3, National Wildlife Federation, comment page 8). BLM agrees that revision of existing AMPs and implementation of new ones would help to improve range condition (draft appendixes P and U).

Page A-125, Isolated Tracts Identified for Disposal: It is recommended that the BLM land associated with Recapture Reservoir be retained in federal ownership to assure public access for recreational purposes, especially hunting and fishing. Additionally, those tracts northeast of Monticello that support sage grouse are the only ones that remain in public ownership. Rangeland conversions on private land in the SJRA have substantially reduced sage grouse populations. Their future is dependent upon BLM land managed exclusively for this species. Those lands should be retained by BLM and a HMP developed for sage grouse.

Page A-195, Assumptions: What sources were the assumptions based on? The figures for sites per square mile and percentage of damaged sites appears arbitrary.

It is important to note that placement on the National Register of Historic Places does not in and of itself provide statutory protection for sites.

[Comment page 12]

Page A-125, Isolated Tracts Identified for Disposal. San Juan County has received a right-of-way for the area to ensure legal access to Recapture Lake and the surrounding area. If the tracts were disposed of, provisions would be made to protect these rights-of-way.

The sage grouse habitat was not identified in the either MSA or the RMP/EIS for special management. The RMP sets criteria to guide disposal of tracts of public lands; the suitability of an individual tract for disposal would be determined through a site-specific analysis done at the time the parcel was considered for disposal (draft page A-125). If disposal of any of the tracts identified in the RMP/EIS would cause an adverse effect on public resources, including critical wildlife habitat, the terms of disposal would be modified to mitigate the potential impact, or the tract would be retained in public ownership.

Page A-195, Assumptions (Appendix Y). See comment 31, and the response, regarding the State's position on cultural resource management. The analysis method is presented for information purposes and is based on the professional knowledge and judgment of the RMP team archaeologist. This comment offers no alternative mode for projecting impacts to cultural resources.

BLM is aware that designation to the National Register does not provide for any specific management methods to protect sites present. Accordingly, BLM has included special conditions within the RMP/EIS that would serve to protect these sites (draft appendix A).

Change to the EIS? Yes.

COMMENT 31

STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY
84114

NORMAN H. BANGERTER
GOVERNOR

January 21, 1987

Roland Robison
Utah State Director
Bureau of Land Management
CFS Financial Center
Suite 301
324 South State Street
Salt Lake City, Utah 84111-2303

Dear Mr. Robison:

Developing the best possible working relationship with the BLM in Utah has been a very worthwhile state objective for many years. In furtherance of that objective, I believe it would be helpful to clarify some issues that have arisen over our comments on the Draft San Juan Resource Management Plan and Environmental Impact Statement. It has come to my attention that some of those comments have tended to obscure the state's position relative to certain key aspects of public lands management. It is my intent to clarify those positions and to respond to discussions recently held.

As you know, state and BLM staff met on December 3rd to discuss several issues. As a result of this meeting two points were clarified. First, in the area of special designations, the discussion at the meeting clarified two points of misunderstanding: 1) the State in its comments did not intend to make any new special area nominations; and, 2) BLM's rationale for excluding or reducing acreage of many of the areas identified as potential special management areas was mistakenly left out of the document. Our major point of contention was the lack of rationale for special designation decision-making. Inclusion of this explanation in the final plan will address these concerns. We appreciate the time your staff took to clarify this issue.

Second, in the area of range management, after discussions with your staff, it appears that we misread the information provided in the document. We assumed, based on the criteria in

RESPONSE TO COMMENT 31 STATE OF UTAH, OFFICE OF THE GOVERNOR

[Comment page 1]

BLM appreciates the State's interest and involvement in the preparation of the San Juan RMP.

BLM acknowledges the clarification that the State does not intend to recommend any areas for special designation. In response to the public comments received on the draft, several changes have been made to the special designation areas considered in the draft. See the revisions to draft summary, chapters 2 and 4, and appendixes A, H, and I.

BLM regrets any confusion regarding the rationale for dropping areas from further consideration for special designations, or the differences in acreages considered among the alternatives. See appendix H, as revised, for a complete rationale.

Appendix D and the statement on page 3-54 that 95 percent of the area was placed in Category I, that Category I allotments were in unsatisfactory condition and thus 95 percent of the range in the San Juan Resource Area was in Unsatisfactory or poor condition. Further confusion resulted because "ecological condition" is defined in the Glossary and "range condition" is not. We were informed that the improvement category does not correlate with poor range condition. It was pointed out in the meeting that this confusion between the categorization of allotments, range condition, and ecological condition needed to be clarified in the final environmental impact statement. This would help the reader better understand the range condition issue in the San Juan Resource Area. Consequently, our concern regarding range condition and the maintenance of the status quo for grazing management under the preferred alternative was alleviated as a result of our meeting. Livestock grazing in this resource area is very important to the local economy and with prudent range management and the stewardship of permittees, everyone benefits with improved ranges for both livestock and wildlife.

As you are well aware, the state supports the multiple use of public lands. The comments that we submitted were not intended to value one use over another but rather to suggest possible further considerations. The following specific comments are clarifications of some of those issues.

Cultural Resources

The intent was to raise the question as to whether cultural resources should be considered a planning issue rather than to suggest any specific mode of protection for those resources. The comments should be evaluated in this context.

Off Road Vehicles

The state does not believe that vehicular access should be precluded from all riparian zones. Utah recognizes that vehicular access to riparian zones is often essential to management of the water resource or to management of users of the water resource. Vehicular access to riparian zones should not be wasteful of the resouce.

Riparian Area

While a blanket exclusion is not practical, in riparian areas increased management attention/efforts should be provided to manage livestock consistent with protection of these sensitive areas.

[Comment page 2]

The draft has been revised to clarify the situation regarding rangeland condition (see revisions to appendix T and glossary). See also response to comment 22, Environmental Protection Agency, comment page 3.

Responses to specific comments clarified by this letter are as follows.

Cultural Resources. Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion of the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

Off Road Vehicles. The draft RMP/EIS applied the least restriction neccessary to resolve resource conflicts. Accordingly, lands would not be designated as closed or limited to ORV use unless this level of management was the only way to resolve a specific conflict. BLM agrees that exclusion of vehicular access to riparian areas is not always needed to protect the riparian resources; the proposed RMP would allow ORV use of riparian zones on existing roads and trails.

Riparian Areas. BLM agrees that small grazing exclusions in riparian zones are sometimes the preferable means to manage these sensitive areas. If necessary to preserve riparian values, specific parcels of riparian habitat may be closed to grazing as part of the management developed in AMPs after completion of the RMP. However, it is anticipated that most riparian areas can be managed for improvement while allowing some grazing, perhaps under grazing systems that would provide for periodic rest and recovery.

Page three
Roland Robison

Wilderness Study Areas

Utah has not supported wilderness or wilderness-like management of any BLM tracts solely for the purpose of protecting Big Horn sheep populations. While Big Horn sheep are recognized as a highly valued wildlife resource, the state recognizes that tracts inhabited by Big Horn Sheep may well have other valuable resources. Utah does not have a policy of excluding other natural resource based activities in tracts, solely on the basis of Big Horn sheep inhabitation.

Tar Sands

Utah recognizes that the suggestion that a tar sands resource may exist is based on the known geology of the area. The state believes that it is best to error on the side of caution in evaluating whether subsurface resources exist. The state and BLM should be aware of the potentional of these subsurface resources, and this is an area that would certainly benefit from further geologic study.

Tourism

The state's comments should not be construed as a suggestion that tourism should be valued over grazing. It is the position of Utah that grazing and tourism are mutually compatible and mutually beneficial.

I know that my staff has discussed with you the need to communicate better during the review process of these documents to avoid these types of misunderstanding in the future. I fully support that effort.

The San Juan area is a complex resource area and I know that you are attempting to develop a responsible management plan. I would like the State of Utah to be a partner in that effort with the goal of true multiple use management in the area.

Thank you for your interest in accommodating the State's interests. It is through such willingness that our relationship will flourish.

Sincerely,

Norman H. Bangerter
Governor

NHB/ras

RESPONSE TO COMMENT 31 STATE OF UTAH, OFFICE OF THE GOVERNOR

[Comment page 3]

Wilderness Study Areas. The San Juan RMP team is aware of the State's concerns and comments regarding wilderness preservation. As noted, the San Juan RMP addresses management of areas under wilderness review if these areas are dropped from consideration for wilderness designation by Congress (draft page 1-2).

While the proposed RMP makes no attempt to impose "wilderness-like" management designations, BLM recognizes that certain values that may lead to enjoyment of a wilderness experience, such as the presence of bighorn sheep, may require protective measures in their own right.

Tar Sand. BLM agrees that the potential for tar sand occurrence in SJRA should not be overlooked.

Tourism. BLM agrees that both tourism and livestock grazing are important to the economy of San Juan County, and that conflicts between recreation management and livestock grazing are few.

BLM appreciates the State's efforts at open communication regarding land management. The San Juan RMP will provide guidelines for management of the many and varied natural resources within SJRA, and the proposed plan attempts to resolve conflicts so that the multiple users of our public lands will benefit.

Change to the EIS? No.

COMMENT 32

Inviting
Friendly Unforgettable

San Juan County

Monticello, Utah 84535
(801) 587-2231

County Offices
KENNETH R. BAILEY-Commissioner
CALVIN BLACK-Commissioner
JERRY HOLLIDAY-Commissioner
GAIL D. JOHNSON-Clerk and Auditor
MARY LOU MOSHER-Recorder
BARBARA MONTELLA-Assessor
MARIAN BAYLES-Treasurer
S. RIGBY WRIGHT-Sheriff
BRUCE K. HALLIDAY-Attorney
Travel / Development Council

November 3, 1986

Mr. Ed Scherick
San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Attention: RMP

Dear Mr. Scherick:

Enclosed with this letter is the San Juan County Commission's comments on the draft resource management plan/environmental impact statement (RMP/EIS) for the San Juan Resource Area.

Thank you for the opportunity to comment on this plan.

THE SAN JUAN COUNTY COMMISSION

Calvin Black, Chairman

Kenneth R. Bailey, Vice-Chairman

Jerry Holliday, Commissioner

:rmb
Enclosure:

SAN JUAN COUNTY COMMISSION'S COMMENTS

ON THE DRAFT RESOURCE MANAGEMENT

ENVIRONMENTAL IMPACT STATEMENT

FOR THE SAN JUAN RESOURCE AREA

NOVEMBER 1986

In reviewing the draft document, it is evident that Alternative C and D require substantial increases in funding in order to provide the needed services and work to accomplish these alternatives. As the current federal funding situation is as other state and local governments, it seems very difficult that such a large increase in funding would be appropriate or possible in this time. Also, these two alternatives seem to move to remove multiple uses and tend to move toward special interest groups more that the other alternatives. As stated in the document itself, public lands are to be managed for multiple use, for the many and varied public uses and interests that individuals, companies, and other governments agencies may want to. Many of the statements that are made in conjunction with some of the alternatives do not preserve the multiple use concept and if fact will provide areas in which can be used to oppose multiple use.

While it is argued that public lands are for all the people from all areas of the nation, the Bureau of Land Management and other agencies, do have a responsibility in providing ways for all type of uses especially in a county where over 85% of all the land ownership is federal and where about 1.8 million acres of these lands are managed by the BLM.

The County Commission cannot support either Alternative C or D for the preceding and other reasons.

Alternative E, the preferred alternative also causes great concern for the County Commission. Almost without exception, every program contains the phrases, "only so long as certain primitive recreational opportunities, identified wildlife habitat and watershed activities are protected" or "only so long as certain as certain recreational values are protected".

It is easy for the current management of the Bureau of Land Management to assure the County that these statements are for description uses only and will not be a hinderance to any development, road, etc. It is not known from one day to the next who will be in a management position, and a change in these positions, could and will dictate a different assumption as to

RESPONSE TO COMMENT 32 SAN JUAN COUNTY COMMISSION

[Comment page 1]

BLM assumes that funding would be available to implement any RMP alternative adopted by the state director (draft page 1-2). The budget figures have been revised; alternative A would be the least costly to implement, followed by alternative D. Alternative B, favored by this commentor, would be the most costly to implement, followed by alternative C. (See revisions to draft table 2-4 and appendix K; see also the response to comment 9, Southern Utah Wilderness Alliance, comment page 4, on this topic.)

Each alternative would manage public lands based on the multiple use concept (draft page 1-9). However, each alternative emphasizes a different mix of resource uses (draft page 2-12).

BLM appreciates the comments regarding the alternatives, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

As noted in this comment, the preferred alternative references "certain" recreational opportunities, and "identified" wildlife habitats. These terms are defined in draft appendix A and used consistently throughout the draft. The special conditions developed to protect these values (draft appendix A) would not be applied arbitrarily, and could not be applied to different areas in the future without changing the RMP (draft page A-30). Changes to the RMP would have to follow the NEPA process, and would be subject to public review (draft page A-30).

Under the preferred alternative, protection of "certain" P and SPNM ROS class areas refers to all P and SPNM areas shown in figure 3-16 except the areas in the vicinity of Squaw and Cross Canyons, near the Colorado state line (draft pages A-24 and A-25). Protection of "identified" wildlife habitats refers to the crucial habitat areas for bighorn sheep, antelope, and deer, shown in figures 3-11 and 3-12 (draft pages A-21 and A-22). Watershed values would be protected in riparian areas, sensitive soils areas, and areas of sensitive slopes (draft pages A-20 and A-21).

what is meant by such phrases. It is also certain that environmental groups will work long and hard in each and every situation to find areas where certain primitive recreational opportunities are not protected and well as the other requirement, attempting to tie projects up for years. We believe that this gives these groups substantial ammunition in filing lawsuits on projects, and asking the courts to determine what it the definition of these phrases and it is impossible for either the County or the BLM to anticipate what the courts will determine. Because of the wording of these alternatives the County does not support alternative E.

The Commission does support the management program for oil and gas management in Alternative B. The 10% proposed increase in leasing will allow companies for more opportunity to invest and enter into this area. The Commission also supports the management plan for geothermal management, oil shale/tar sands management, mineral materials management and mining law administration and mineral management as contain in Alternative B; as well as the other resource management programs. This alternative addresses the need and resources of the County and how to use these resources to the maximum. It also benefits these individuals and companies who have invested tremendous amounts of monies and time in business in both mining, oil and gas, and ranching and assures them that these investment will be allow to remain. It is also possible that environmental concerns and needs will be taken into account and properly mitigated and handled through proper management the BLM.

RESPONSE TO COMMENT 32 SAN JUAN COUNTY COMMISSION

[Comment page 2]

BLM understands the County's concern for economic development of resources within County boundaries. Social and economic considerations and projected impacts have been discussed in the draft (table 2-10, chapter 3, and chapter 4) and for each management program in part II of the MSA.

Change to the EIS? No.

COMMENT 33

Northern Arizona University · FLAGSTAFF, ARIZONA 86011
ARCHAEOLOGY LABORATORY
DEPARTMENT OF ANTHROPOLOGY
BOX 15200

Ed Scherick,
San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, Utah, 84535
Attn: RMP

Dear Mr. Scherick:

I am writing to you in regard to the San Juan Resource Management Plan, which I first saw last weekend. It is nice to see the entire area treated as a whole and to see the various alternatives outlined. I was, however, very concerned about two aspects that occur throughout the alternatives, and therefore are a concern for the preferred alternative "E". These are the lack of plans for "Cultural Resource Management" and the existence of plans for "new land treatments" in areas of very high site densities.

The first concern of cultural resource management is disappointing to me. While it is admitted that the primary loss of sites is due to vandalism and very high numbers are given for this, no detailed discussion is given to possible ways of curbing it. Given that in a area where a large part of the population equates pothunting with something like Christmas Tree cutting, this is a very difficult subject. No matter what the law says, if the local community believes differently, the law is apt to be ignored. I can imagine that it gets even more difficult when it is possible that even BLM staff would rather not enforce the law and one hears tales of this. Given this difficult situation, it may be easiest to let things continue as they are, but I, and I'm sure you agree, do not think the current situation should continue. Some kind of education program is clearly in order. Yet, I found nothing in the RMP in the order of even a discussion of alternatives.

The result of such destruction is clear, our inability to learn more about the past in the future. As a single example, in part from samples taken from Turkey Pen in Grand Gulch in 1972 I have this year, with co-workers, been able to demonstrate convincingly the dependence of Basketmaker II on

PHONE: (602) 523-5038 / 523-5039

RESPONSE TO COMMENT 33

NORTHERN ARIZONA UNIVERSITY
ARCHAEOLOGY LABORATORY

[Comment page 1]

BLM appreciates this support for the presentation of alternatives.

BLM recognizes the need to protect cultural resources, and the draft RMP provides plans for cultural resource management. The policy and procedures for managing cultural resources are discussed in the draft on page 2-6 under Management Guidance Common to All Alternatives. The preferred alternative provides several special designations for cultural resources (see draft table 2-2, page 2-20, and table 2-6, page 2-60, both as revised). (Stipulations for management of the special designations proposed for the RMP are given in draft appendix A.) BLM is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

BLM recognizes that vandalism and adverse impacts to cultural resources have occurred in the past and continue to occur despite mitigation efforts (draft pages 3-60 and 4-16 and MSA page 4331-20). The preferred alternative is expected to improve BLM's management of cultural resources in that fewer adverse impacts would occur (see draft table 2-10, page 2-96 as revised, page 4-68, and appendix Y).

BLM agrees that education is a valuable tool for promoting protection of cultural resources, and BLM provides or participates in educational programs. This land-use plan, however, provides for allocation and management of the multiple uses of public lands, and would not be expected to cover all types of public service programs in which BLM might participate.

BLM agrees that Turkey Pen Ruin is a significant archaeological site.

Maize. This is in direct contradiction to recent statements made about the dependence on maize by someother workers, but we now can show that 70 to 80% of the Cedar Mesa Basketmaker II diet came from maize, about the same as the latter Pueblo inhabitants, not only on Cedar Mesa, but Historically as well. Since 1972, as you know, Turkey Pen has been extensively damaged twice. It may now be not possible to retrieve a 1 by 3 meter piece of the deposit as I did in 1972. Extensive literature review and personal contacts indicates that there is no other Basketmaker II midden of that size and richness in organic remains known. I know you have on file a much more extensive discussion of the importance of Turkey Pen by William Lipe, although we had not obtained the above results at that time, nor do I think he was aware that no other site like it is known to exist.

In terms of resources, the Anasazi resources have to be some of the most important, to humankind as a whole, found in the San Juan Resource Area. Given their rapid destruction, mostly by vandalism today, this is a topic that is inadequately addressed. I doubt that there is another BLM area with as important and as used archaeological resources, which probably does not make your task easier in getting appropriate resources to protect them in either the short or long run.

My second area of concern is the potential land treatments. In your preferred alternative E (Figure 2-15) the highland areas of "Cedar Mesa" or the Grand Gulch Plateau is the main area suggested, with other areas around Natural Bridges and between Comb and Cottonwood. While various suggestions are made in the various alternatives about protecting the Canyons, it is actually on the top of the mesas that most of the sites exist. I presume Land Treatments mean modification of the Pinyon-Juniper, and not the sagebrush flats. On Cedar Mesa it is exactly the highland Pinyon-Juniper that have the highest densities of the largest sites, ranging up to 100 per square mile, depending, of course, how you define "site". It appears, then, that you are trying to protect certain kinds of areas with cliff-dwellings, do nothing in others, but in the areas with the most sites, endanger them.

In my understanding of "Pinyon-Juniper conversion" the economics are doubtfull (as in the 1975 Pinyon-Juniper Symposium volume by Utah State), but that it can be see as a subsidy to ranchers. Given the known high site density on Cedar Mesa the costs would have to increase dramatically, as the land would have to be carefully surveyed, with all sites carefully posted, and then the chaining carefully supervised so that "mistakes" did not occur, or the areas around sites, hand cut, which would also drive up the costs. The end result would also result in pointing out all the sites to

RESPONSE TO COMMENT 33

NORTHERN ARIZONA UNIVERSITY
ARCHAEOLOGY LABORATORY

[Comment page 2]

BLM is also concerned with enforcement of laws protecting cultural resources. However, a land-use management plan provides for the allocation of multiple uses under law (draft page 1-10). The RMP does not plan for illegal resource uses, or provide an appropriate forum to resolve administrative concerns such as funding and personnel needs (draft table I-2 and figure I-3).

Land treatments potentially could include conversion of sagebrush flats as well as stands of pinyon and juniper.

The potential land treatments shown in the draft are physically suitable areas, not proposed projects. The draft is revised to clarify this, and to indicate that priority would be given to maintaining existing land treatments (see revisions to draft pages 2-6 and 2-68). The method of treatment would be determined when a project was actually proposed.

It is true that in the past, prehistoric sites have been destroyed in the process of pinyon-juniper chainings. NEPA documentation done at the time a project was proposed would indicate impacts to other resources, including cultural resources (draft pages 2-1, A-1, and A-29). Treatment methods could include prescribed fire, herbicides, or mechanical means. Under the proposed RMP, the special conditions for Cedar Mesa proposed ACEC would have to be met for all projects, including land treatments, within the proposed ACEC.

It is true that chainings are high-cost projects, and may not be economically feasible in a given area. BLM would complete a cost/benefit analysis on each site-specific project before deciding whether to fund the project. The potential for added cost due to the high density of cultural sites in areas of SJRA would be accounted for in the analysis. In cases where permittees are willing to fund 100 percent of a project's cost, a cost/benefit analysis would not be prepared.

vandals, in case there were some that hadn't already been hit, by having them the only areas with trees or with stumps. I don't know what the exact costs would be when the sites are taken into account, but I am certain it would cause a dramatic increase.

The result of this land treatment would be a few more animals at a higher money cost and with other environmental costs, at a time when the demand for beef is decreasing. Given that ranchers are hard hit, even the proposed scale is not going to make a significant difference, something else is needed to change their economic situation.

I believe the first issue is not one easily resolved, but needs to be faced and resources allocated. The second of land treatments, appears to be one of economic and environmental folly. I can not believe it has been seriously thought through, although it has been raised in the past as well. In the past the resources were not as well known and so perhaps a case in ignorance could be made. But today we know about the sites and some of the limitations of pinyon-juniper conversions, and some studies of the latter were supported by the BLM and carried out on Cedar Mesa.

Yours,

R.G. Matson

R.G. Matson
Adjunct Professor of Archaeology

RESPONSE TO COMMENT 33

NORTHERN ARIZONA UNIVERSITY
ARCHAEOLOGY LABORATORY

[Comment page 3]

Livestock use of public rangelands is requested by private permittees, presumably for economic profit. The Federal Government does not have the authority to dictate the timetable for economic pursuits by private interests or to prejudge private proposals as economic folly.

No new chainings have occurred on public lands on Cedar Mesa, or elsewhere within SJRA, since 1972 (draft page 3-58).

Change to the EIS? No.

COMMENT 34

Northern Arizona University · FLAGSTAFF, ARIZONA 86011
ARCHAEOLOGY LABORATORY
DEPARTMENT OF ANTHROPOLOGY
BOX 15200

October 27, 1986

Ed Scherick, Manager
San Juan Resource Area
BLM Box 7
Monticello, UT 84535

Dear Mr. Scherick:

On October 24-25, we held a symposium in Monument Valley on the prehistoric Anasazi of the Four Corners area. Twenty-eight of the attendees, all professional archaeologists, were upset enough by the BLM lack of proper attention to prehistoric and historic cultural resources in the San Juan Resource Area to sign the enclosed hastily-drafted petition. As noted in the draft Resource Management Plan, the San Juan Resource Area contains many informative and irreplaceable cultural sites, and we feel these should not be given short shrift.

Sincerely,

J. Richard Ambler
Research Professor

JRA:bhb

Enclosure

PHONE: (602) 523-3038 / 523-3039

RESPONSE TO COMMENT 34

NORTHERN ARIZONA UNIVERSITY
ARCHAEOLOGY LABORATORY

[Comment page 1]

BLM appreciates the professional concern and interest of the many people who signed the attached petition.

BLM recognizes the need to protect cultural resources, and the draft RMP provides for cultural resource management. BLM is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. See also the response to comment 33, Northern Arizona University, Archaeology Laboratory.

Change to the EIS? No.

Symposium Copy

PETITION

We, the undersigned members of the professional archaeological community, wish to register a grave concern over the management of cultural resources on BLM lands in southeast Utah. These cultural resources are highly significant, unique, and represent an irreplaceable national treasure. For many years we have been aware of the massive and widespread destruction of these resources due to vandalism and inadequate agency protection and management.

The BLM has failed to identify the conservation of these resources as a requisite planning issue in the draft of the San Juan RMP. This action fails to satisfy the BLM mandate under FLPMA and other legislation requiring protection of these resources. We hereby request that the San Juan RMP be rewritten to include the need for protection and management of cultural resources as a planning issue.

SIGNED NAME	ADDRESS AND INSTITUTION REPRESENTING
1. Martha Callahan	Box 595, Flagstaff, AZ 86002 Museum of N. AZ
2. Alexander J. Lindsay Jr.	1001 E. Chula Vista Rd. Tucson, Az 85718 Arizona State Museum, University of Arizona
3. Barbara J. Mills	437 Solano NE Albuquerque, NM 87108 University of New Mexico
4. Timothy M. Kearns	975 US Hwy 64 Farmington NM 87401
5. Mark J. Hovezak	P.O. Box 22219, Flagstaff AZ 86002
6. R. G. Matson	1414 N Beaver Ad Flagstaff, AZ 86001
7. John Davenport	Badger Creek Marble Canyon Az 86036
8. Jeffrey S. Dean	3737 E. Belvue #10, Tucson, Az 85716. Tree-ring lab, Univ of Arizona, Tucson, Az 85721
9. Robert M. Leslie	Box 41 Dolores Co 81323
10. Helen C. Fairley	16 Sherwood Lane, Flagstaff AZ 86001
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MAIL BY NOVEMBER 3, 1986 to: Ed Schenck, Manager San Juan Resource Area BLM Box 7, Monticello UT 84535

Symposium Copy

PETITION

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SIGNED NAME	ADDRESS AND INSTITUTION REPRESENTING
1.	No. Az Univ, Flg, Flgstff Az
2. David A. Breternitz	P.O. Box 592, Dove Creek, Co 81324 Mesa Verde Regional Research Center
3.	PO Box 595, Flagstaff AZ 86002
4.	Dept of Anthro SIUE Edwardsville Il. 62026
5.	Museum of New Mexico, P.O. Box 2087, Santa Fe NM 87504
6. Terri A. Cleveland	PO Box 802 Williams AZ 86046
7. Marietta Davenport	Badger Creek Marble Canyon Az. 86036
8. Steven Shelley	Box 8232 CRB, Tucson, AZ 85738
9. Bruce A. Anderson	110 Verano Loop - Eldorado, Santa Fe, NM 87505
10. Andrew J. Christenson	Center for Archaeological Investigations Southern Illinois University, Carbondale, Il 62901
11. John R Stein	1221 Dartmouth N.E. Alb. N.M. 87106
12. Peter W Bungart	402 W. Cherry, Flagstaff, AZ 86001
13 Tim Q Kohler	666 Garcia St., Santa Fe, NM 87501
14. Paul Hooker	3216 Monte Vista Flagstaff AZ 86004
15. Laurence M Perko	PO Box 802 Williams AZ 86046
16. Margie Connolly	3216 Monte Vista St Flagstaff Az 86004
17. Angela Schwab	P.O. Box 934 Dolores, CO 81323
18.	

MAIL BY NOVEMBER 3, 1986 to: Ed Scherick, Manager San Juan Resource Area BLM Box 7 Monticello UT 84535

PETITION

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	SIGNED NAME	ADDRESS AND INSTITUTION REPRESENTING
1.	Frances Joan Mathien,	Adjunct Assistant Professor, Dept. of Anthropology, University of New Mexico, Albuquerque, NM 87131
2.	Tom Windes	305 Richmond SE, ALBUQ., NM 87106
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MAIL BY NOVEMBER 3, 1986 to: Ed Scherick, Manager San Juan Resource Area
BLM Box 7 Monticello UT 84535

PETITION

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SIGNED NAME	ADDRESS AND INSTITUTION REPRESENTING
1. Richard V. M. Ahlstrom	3920 E. Kleindale Rd., Apt. B Tucson Az 85712 [redacted]
2. Peter J. Miller Jr	2511 E. Miller Dr. Flagstaff Az. 86001
3. Noel Doyle	P.O. Box 2993, SEDONA AZ. 86336
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MAIL BY NOVEMBER 3, 1986 to: Ed Scherick, Manager San Juan Resource Area
BLM Box 7 Monticello UT 84535

PETITION

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SIGNED NAME	ADDRESS AND INSTITUTION REPRESENTING	
1. Cynthia Bradley	23390 County Rd K Cortez, Co	Crow Canyon Arch. Center
2. Bruce A. Bradley, PhD Assoc. Dir. of Research	23390 County Rd K Cortez, Co	Crow Canyon Archaeological Center
3. Esther Allen	15800 C.R. 31 MANCOS CO	CROW CANYON A.C.
4. Lew Mates	232 Bauer Ave. Mancos, Co	Crow Canyon A.C.
5. Margaret A. Hassell	109 N. 9th, Dolores, CO	Crow Canyon A.C.
6. Ian M. Thompson	23390 Co. Rd. K	Cortez, Colo.
7. Jim Kleckner	P.O. 593	Dolores, Co
8. Vicky Lightfoot	12296 C.R 33, MANCOS, CO	
9.		
10.		

PETITION

We, the undersigned members of the professional archaeological community, wish to register a grave concern over the management of cultural resources on BLM lands in southeast Utah. These cultural resources are highly significant, unique, and represent an irreplaceable national treasure. For many years we have been aware of the massive and widespread destruction of these resources due to vandalism and inadequate agency protection and management.

The BLM has failed to identify the conservation of these resources as a requisite planning issue in the draft of the San Juan RMP. This action fails to satisfy the BLM mandate under FLPMA and other legislation requiring protection of these resources. We hereby request that the San Juan RMP be rewritten to include the need for protection and management of cultural resources as a planning issue.

SIGNED NAME	ADDRESS AND INSTITUTION REPRESENTING	
1. Mary E. Johnson	23608 CR T, Dolores, CO,	Crow Canyon Archaeological Center
2. Kirk Fleming	23608 CR T, Dolores, CO	"
3.		
4.		
5.		

MAIL BY NOVEMBER 3, 1986 to: Ed Scherick, Manager San Juan Resource Area
BLM Box 7 Monticello UT 84535

COMMENT 35

ARIZONA STATE MUSEUM
THE UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721

Ed Scherick, Manager
San Juan Resource Area
Bureau of Land Management
Box 7
Monticello, Utah 84535 October 29, 1986
ATTN: RMP

Dear Mr. Scherick:

I recently had the opportunity to review the draft resource management plan/environmental impact statement for the San Juan Resource Area of the Moab District, BLM. Having worked for many years as an archaeologist in southwestern Colorado, having hiked or backpacked many times in the San Juan Resource Area, and given the recent highly publicized vandalism to cultural resources cases originating from southeastern Utah, I was frankly shocked that the cultural resources of the area were written off as not qualifying as a planning issue in your RMP/EIS.

While use and management of cultural resources are specifically governed by national laws and regulations, it is in fact the responsibility of each district office to implement these laws and regulations as they pertain to the unique cultural resources of their area. What you imply in your statement on page 1-6 is that BLM has a generic attitude tward cultural resources. Whether the resources are in Montana, Utah, or Arizona they are all treated the same. In fact each resource base is unique and needs quite specific guidelines at the district level to help local managers in making reasonable decisions about their cultural resource, not some generic solution to a unique problem. Are you willing to just write off the more than 15,000 cultural properties that will be damaged by the year 2000 under your preferred alternative?

The cultural resources administered by the San Juan Resource area, Moab District are very significant, unique, irreplaceable resources to this nation. Given the massive destruction of this resource base through vandalism and natural processes, it is absolutely essential that a keystone to the RMP/EIS is a plan to protect and conserve these resources. Such a plan should deal with the unique factors that make cultural resources in southeastrn Utah what they are today. Such a plan should include adult and school age educational programs; economic disincentives (perhaps through the IRS) for trade in antiquities; stabilization and maintenance of the particularly fragile rock art, artifacts, and architecture in dry caves; control of backpacking and hiking into sensitive areas through a permit system; as well as standard law enforcement measures.

RESPONSE TO COMMENT 35

UNIVERSITY OF ARIZONA
ARIZONA STATE MUSEUM

[Comment page 1]

BLM agrees that cultural sites are an important resource in SJRA. However, management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussions on planning issues and the treatment of cultural resources under the different alternatives have been expanded in this proposed RMP and final EIS (see the revisions to draft page 1-6).

BLM's policy and procedures for managing cultural resources are discussed on draft page 2-6 under Management Guidance Common to All Alternatives. The draft would establish cultural use zones under all alternatives which would provide for all recognized management uses of cultural resources (draft pages 2-6 and 3-60, figure 3-15, and table 3-9).

BLM recognizes that vandalism and adverse impacts to cultural resources have occurred in the past and continue to occur despite mitigation efforts (see draft pages 3-60 and 4-16 and MSA page 4331-20). The preferred alternative is expected to improve BLM's management of cultural resources in that fewer adverse impacts would occur (see draft table 2-10, page 2-96 as revised, page 4-68, and appendix Y). BLM also recognizes that a residual amount of damage to cultural sites would occur under any alternative assessed in the draft (table 2-10).

BLM agrees that education is a valuable tool for promoting protection of cultural resources, and BLM provides or participates in educational programs. The RMP is a land-use plan that provides for allocation and management of the multiple uses of public lands. BLM is not in a position, through the RMP or otherwise, to tell the schools in San Juan County what to teach. Similarly, offering economic disincentives for trade in antiquities is beyond both BLM's authority and the province of a land-use plan. The RMP cannot serve as a medium for BLM to tell IRS how to regulate trade in antiquities.

The RMP provides overall guidance; management of specific sites or areas would be determined through an activity plan (draft pages 2-1 and A-29). The draft (page 2-6 and table 2-7) provides for development of CRMPs for management of specific cultural resource properties or districts. Projects such as stabilization and maintenance of rock art, artifacts, and architecture, as suggested in this comment, would be covered in these activity-level plans. Where needed, visitor use would be regulated through registration, reservations, or access restrictions at the activity plan level. Standard law enforcement measures are now being provided across SJRA; the RMP does not plan for illegal uses of public lands (draft page 1-10).

I urge you to rewrite the Draft San Juan Resource Management Plan published in May, 1986, to more accurately deal with cultural resources as required by FLPMA and to develop a plan to not only manage, but also protect and conserve the cultural resources under your jurisdiction. To not develop a plan to deal with the major crises present in the San Juan Resource Area that threatens its cultural resources endangering, according to the draft RMP/EIS, over 15,000 cultural properties in the area by the year 2000, is a major failure to live up to BLM's mandate, under FLPMA, to judicially manage all of its resources and protect and preserve them for future generations.

Sincerely,

E. Charles Adams

E. Charles Adams
Associate Curator of Archaeology

RESPONSE TO COMMENT 35

UNIVERSITY OF ARIZONA
ARIZONA STATE MUSEUM

[Comment page 2]

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. BLM believes the draft adequately addresses the agency's legal obligations, under FLPMA and the antiquities laws, to protect cultural resources.

The RMP contains provisions to protect and conserve cultural resources, through consultation under Section 106 of the National Historic Preservation Act (see revisions to draft page 2-6), compliance with RMP special conditions and project conditions (draft appendix A), law enforcement, special designations (draft chapter 2), and cultural resource use allocation zones (draft page 2-6).

Change to the EIS? No.

COMMENT 36

MESA VERDE REGIONAL RESEARCH CENTER
UNIVERSITY OF COLORADO
P.O. BOX 592
DOVE CREEK, COLORADO 81324

31 October 1986

Ed Scherick, San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, UT 84535
Attn: RMP

Dear Mr. Scherick:

Once again the BLM has not given adequate consideratio nto cultural resources under its jurisdiction, in this instance the September 1985 and May 1986 San Juan Resource Area Management Plans. Both studies contain statement admiting that the BLM is currently not managing its cultural resources---Alternative E goes on to say that this preferred alternative will continue to treat cultural resources as they are currently managed.

The September 1985 publication (pg. 4331-1) states categorically that "Archaeologically, SJRA is one of the richest locales under BLM management." Yes, there are laws designated to protect cultural resources, but the BLM also has an obligation to manage/protect these resources. On page 4331-3 it is stated that "Only about 5 percent of public land in the SJRA has been intensively inventoried for cultural resources. . .". Certainly in order to manage cultural resources, this information is essential, AND stipulated by Executive Order 11593.

Further, on pg. 4331-20 is the statement that "Protection of cultural resources is inadequate. . .", but Alternative E proposes to maintain this status quo. The situation is compounded by the statement)pg. 4331-20) that there is "No regional research plan. . .".

Question: Alternative E specific designations for cultural resources are weak; are they adequate? Specifically, the cultural resources in the Hovenweep National Monument vicinity are given short shrift, as well as the dry caves in the SJRA. Overall, the stipulations are inadequate to protect existant cultural resource values.

Finally, Alternative D is the best proposal, as concerns cultural resources, and the pertinent elements of Alternative D should be incorporated into the preferred Alternative E.

Sincerely,

David A. Breternitz

David A. Breternitz
Director

RESPONSE TO COMMENT 36

UNIVERSITY OF COLORADO
MESA VERDE REGIONAL RESEARCH CENTER

[Comment page 1]

Both the MSA (referenced in this comment as the September 1985 plan) and the draft (referenced in this comment as the May 1986 plan) acknowledge a continuing problem with staffing and funding for cultural resource management in SJRA (draft page I-7); however these are administrative concerns, which cannot be resolved through a land-use plan. (The MSA describes and analyzes the management situation current as of 1985; it discusses problems with existing management, but this does not imply that the RMP/EIS does not address or correct these.) The draft was prepared under the assumption that staffing and funding would be adequate to carry out the plan adopted by the State Director (draft page 1-2).

The draft states that BLM will conduct an ongoing inventory of cultural resources as funding and personnel are available (draft page 2-6). Also, the Utah State Historic Preservation Officer is currently working on a statewide research design.

The preferred alternative as presented in the draft calls for a more active management of cultural resources than under the current situation, and incorporates several special designations aimed at protecting cultural resource sites (draft chapter 2). The difference between management under alternative E and the existing situation is reflected in the impact analysis in the draft (draft table 2-10 and chapter 4). Under the proposed RMP, additional areas have been proposed for protection of cultural resources present (see revisions to draft chapter 2).

As a result of coordination with the NPS, the preferred alternative has been revised to include the area adjacent to Hovenweep NM as a proposed ACEC (see revisions to draft summary, chapters 2, 3, and 4, and appendixes A, H, and I). The special conditions regarding management of National Register eligible sites have also been revised (see revisions to draft appendix A). BLM would be glad to review information on the dry caves referenced; BLM does not agree that the draft gives cultural resources "short shrift."

BLM appreciates the comments regarding alternative D, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Change to the EIS? No.

COMMENT 37

November 2, 1986

San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

Subject: Resource Management Plan

Mr. Schenck:

Your resource area has such outstanding natural areas that I have enjoyed viewing and hiking in, that I was surprised to see in your management plan no areas to be managed as ONA's in the Preferred Alternative. But why should I be surprised. In RMP after RMP I have seen the BLM discriminate against the wilderness (natural) resource by offering only a token amount.

I urge you to manage as ONAs the Cedar Mesa/Comb Ridge area; the White Canyon complex, and the Arch Canyon area. It would be extremely unfortunate if these magnificent areas were left to be exploited for short-term benefit by developers.

Sincerely,

Daryl Anderst
1620 So. Clayton
Denver, CO 80210

RESPONSE TO COMMENT 37 DARYL ANDERST

[Comment page 1]

Because of a shift in BLM policy, the ONA designation has been dropped in favor of the ACEC designation.

The areas mentioned in this comment have been considered in the proposed RMP and final EIS for potential as ACECs. See the response to comment 2, National Parks and Conservation Association, on these designations.

Change to the EIS? No.

COMMENT 38

October 26, 1986

Dear BLM:

I am writing to comment on the San Juan Resource Management Plan. In general I would like to recommend that the BLM put the protection of wilderness and culutral sites at the top of the list of your priorities.

Specifically I would like to recommend that you adopt the following areas as Areas of Critical Environmental Concern: all the lands in the Canyonlands Basin, Beef Basin, Natural Bridges, Hovenweep, Glen Canyon National Recreation Area, Cedar Mesa, Alkali Ridge, White Canyon Complex, Moki-Red Canyon Complex, Dark Canyon and Middle Point.

And I would like to recommend these areas for Outstanding Narural Areas: all the roadless lands in the Cedar Mesa ACEC, the White Canyon Complex, the entire Dark Canyon and Middle Point areas and the entire Canyonlands Basin lands.

The lands that I am recommending should be closed to oil and gas leasing. ORV use should be limited in those areas to existing roads. Range inprovements and vegetative manipulation should be allowed only if ACEC/ONA values are not harmed.

Finally it is of crucial importance that the BLM recognize that cultural resource planning is an issue. The BLM should amend or suppliment the draft RMP to identify special management actions the BLM will take to protect cultural resources.

Thank you for considering my comments.

Respectfully,

Jim Aton

Jim Aton
9150 W. 2400 S.
Cedar City, UT 84720

RESPONSE TO COMMENT 38 JIM ATON

[Comment page 1]

Discussion of the need to protect wilderness values and wilderness designation is deferred to the statewide wilderness EIS (draft page 1-2).

The comment is noted. For a discussion of changes to the draft regarding ACEC nominations on ONA designations, and the level of management prescriptions needed to protect values at risk, see the response to comment 2 from National Parks and Conservation Association.

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see draft page 1-6).

Change to the EIS? No.

F. A. Barnes
WRITER-PHOTOGRAPHER
P.O. Box 963, Moab, UT 84532
13 October 1986

COMMENT 39

Manager
San Juan Resource Area
Bureau of Land Management
P. O. Box 7
Monticello, UT 84535

Reference: Draft Resource Management Plan, San Juan Resource Area

Dear Sir:

I have made a preliminary study of the referenced document and found it to be deficient in many ways, but wish to go on record as objecting strenuously to its almost total failure to provide adequate recognition of and protection for the area's outstanding and important prehistoric cultural values as required under various existing laws and implementing regulations.

It is recognized that an appreciable percentage of the cultural resources in your area have been quite literally stolen or destroyed by local and regional "pothunters" and vandals, but this is certainly no reason for continuing to neglect the careful inventorying and more diligent protection of what remains. Under various federal laws and policies, this is the duty of the Bureau of Land Management in general and your office in particular. If this legal obligation is not adequately addressed within the referenced document, it will not be funded or performed.

During the twenty years that I have lived within southeastern Utah I have extensively explored the region and have written and had published several books and numerous periodical articles on the subject of Utah's prehistoric cultures. While gathering material for these, it has been my direct and personal observation that much of the past loss of cultural resources from the San Juan Resource Area has been due to your office's failure to enforce existing laws requiring their protection, and that this obvious and continuing neglect has been interpreted by archaeological vandals and thieves as tacit permission to pursue their destructive practices.

I thus strongly recommended that at the very least the referenced draft resource management plan be revised to provide a framework for MAXIMUM protection under existing law of the area's remaining cultural resources, rather than the less-than-minimum in the referenced draft plan.

I may be submitting further comments on this draft plan before the established deadline, but wanted to give urgent top priority to this extremely critical matter.

Sincerely,

F. A. Barnes

RESPONSE TO COMMENT 39 — F.A. BARNES

[Comment page 1]

BLM's policy and procedures for managing cultural resources are discussed in the draft on page 2-6 under Management Guidance Common to All Alternatives. BLM is confident that the draft adequately addresses the agency's legal obligations, and does not agree that legal obligations will not be funded or performed if not addressed in the RMP. (See also draft page 1-6, as revised, page 1-10, and the MSA, pages 4331-3 through 4331-6 on these topics.)

BLM recognizes that vandalism and adverse impacts to cultural resources have occurred in the past and continue to occur despite mitigation efforts (see draft pages 3-60 and 4-16 and MSA page 4331-20). The preferred alternative is expected to improve BLM's management of cultural resources in that fewer adverse impacts would occur (draft table 2-10, page 2-96 as revised, page 4-68, and appendix Y).

Draft alternative D provided for maximum protection of cultural resources (see draft page S-13). The resulting impacts on management of other resources were not thought to provide for the highest and best use of public lands and resources as a whole (see draft table 2-10 and chapter 4.

Change to the EIS? No.

COMMENT 40

Elliott Bernshaw
P.O. Box 6235
Salt Lake City, Utah 84106

October 23, 1986

San Juan Resource Area Manager
Bureau o' Land Mismanagement (B.L.M.)
P.O. Box 7
Monticello, Utah 84535

Dear Manager:

RE.: COMMENTS ON SAN JUAN RESOURCE MGMT. PLAN Draft E.I.S.

Regarding your *suspect* plan for managing **1.8 million acres of practically pristine public land** to the south of Canyonlands National Park in southern Utah, I wish to indicate my support for the probable evaluations presented to you by the National Parks & Conservation Ass'n, the Southern Utah Wild Alliance (S.U.W.A.), the Sierra Club (Utah Chapter especially), and the nation's prestigious Wilderness Society (headquartered in Washington, D.C.).

For **preserving the natural qualities of the entire general area**, I most strongly urge you to give greater consideration to the national interests of preserving remnants of the country's great natural landscape instead of perhaps being too willing to cooperate locally in any and all immediate exploitation of the questionable commodity resources and too liberally permitting destructive forms of mechanized recreation.

As far as I am concerned, it would not be too extreme for you even to "totally lock up" the entire region and allow ***industrial operations*** within it only under the most clearly demonstrated national needs. As for ***ORV*** in the area, they should be reduced almost totally in number and restricted to a tight permit system. There is not much pristine landscape left in the lower-48 states, and this part of southern Utah is some of the very best the nation has left. You must make an extraordinary emphasis to preserve it from man-induced damage and vandalism as much as possible.

Widespread ACEC designations should be considered as a minimum tool for containing the certain-to-increase "conflicting activities" in your area.

RESPONSE TO COMMENT 40 ELLIOT BERNSHAW

[Comment page 1]

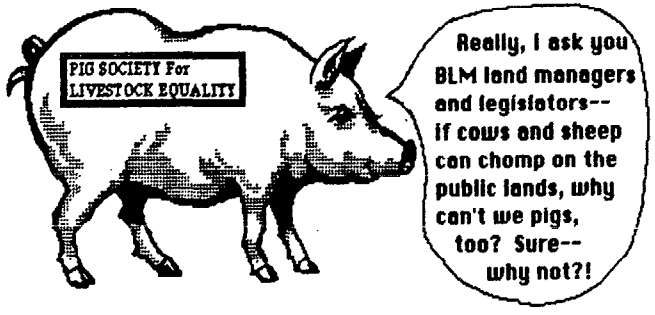
This comment supports the probable evaluations of three organizations. Please refer to the responses to comment 2, National Parks and Conservation Association, and comment 9, Southern Utah Wilderness Alliance. The Wilderness Society did not comment on the San Juan draft RMP/EIS.

The comments regarding preservation of the natural landscape and suggested limitations on industrial operations and ORV use are noted.

Based upon other comments received, BLM has re-evaluated several areas for ACEC potential. The potential ACECs considered in the proposed RMP and final EIS under alternatives D and E have been extensively revised (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I).

Eventually, you also must cease **commercial livestock grazing** operations in this entire general area. The small economic value of public-land livestock grazing does not merit the continued impacts to the natural values of the region as a whole. A blade of grass uneaten is <u>not</u> a blade of grass wasted. Widespread livestock grazing, economically unimportant nationally, must be phased out on public lands with high natural values, and your "resource area" is one of the most valuable natural areas left in the lower-48 states outside of the National Park System.

Please enter into your records the following comment from my pet pig (one restricted entirely to private property--my computer):



I wish you the best for managing one of the best units of our increasingly valued public lands with your minimum budgets, understaffed personnel and the "clear mandates" from our legislators.

Yours most truly,

Elliott Bernshaw,
one who "enjoys" commenting
on public land mgmt. plans
(it's so **meaningful**)

- page 2 -

RESPONSE TO COMMENT 40 ELLIOT BERNSHAW

[Comment page 2]

Grazing use of public lands is authorized under the Taylor Grazing Act and FLPMA, and will be allowed to continue within the parameters of BLM's multiple-use mandate.

Change to the EIS? No.

COMMENT 41

Dear Concerned,

I would like to give my input regarding the BLM's draft San Juan Resource Management Plan (SJRMP).

The lands surrounding Canyonlands N.P., ie Dark Canyon, Beef Basin Canyonlands Basin are both beautifully scenic and recreationally important as well as very vulnerable wilderness that need protection.

These areas need protection for their outstanding wilderness/recreational potential and to protect the ecosystem that surrounds such National Parks & Monuments as Canyonlands, Glen Canyon Recreation Area, National Bridges & Grand Gulch Primitive Area.

I feel the BLM should give top priority in prevent irreparable damage to these areas that pocess incredible historic, cultural, scenic values as well as wildlife & recreational opportunities. The BLM has the opportunity to protect much of this area of the Colorado Plateau as either an Area of Critical Environmental Concern and/or an Outstanding Natural Area; ACEC's and ONA's respectively.

Therefore I would like the BLM to consider & support this designation to the following areas: Canyonlands Basins scenic and cultural values along with its proximity within the ecosystem of Canyonlands National Park should make it a definite candate for

RESPONSE TO COMMENT 41 JAY BICKFORD

[Comment page 1]

The draft (page 1-2) discusses management of WSAs and ISAs if released from wilderness review by Congress. It is assumed that areas released from wilderness review are to be managed for nonwilderness purposes. Therefore, no attempt was made through the RMP to analyze impacts to wilderness values.

Congress has determined that units of the NPS are to be managed under NPS laws, and that public lands, even those adjacent to units of the NPS, are to be managed under FLPMA and other public land laws. See the response to comment 2, National Parks and Conservation Association, for a broader discussion on this topic.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). The management provisions in appendix A are believed adequate to manage surface disturbance in SJRA. BLM has dropped ONA designation in favor of ACEC designation.

ACEC & ONA DESIGNATION FOR THIS REASON AND the FACT that DEER AND BIGHORN SHEEP range here, I support ~~ACE~~ ACEC for the Beef Basin Area. I also support ONA STATUS for Dark Canyon AND Middle Point, which has a PRISTINE & wilderness CHARACTER along with outstanding SCENIC NATURAL & cultural values.

White Canyon Complex adjacent to Dark Canyon AND Natural Bridges is definetly in my OPINION worthy of ONA designation. Another area worthy of ONA designation is Cedar Mesa which includes canyons such as, Grand gulch, Johns, Slickhorn, Fish & Owl, Lime, Road, Mule and Arch Canyons. The list goes on: Moki-Red Canyon Complex, Alkali Ridge, Glen Canyon National Recreation Area, Hovenweep, and areas surrounding Natural Bridges Monument (ie Harmony flat, Woodenshoe Buttes The Toe and Deer Canyon) are worthy of ACEC designation.

Wildnerness and Natural Habitat DESERVE TO BE PROTECTED FOR THE VERY REASON THAT THEY ARE THE GEMS OF MOTHER EARTHS BOUNTY. PLEASE SAVE THEM FOR THE WILDLIFE, CULTURAL VALUES AND FUTURE GENERATIONS!

Sincerly,

JAY BICKFORD

1241 E 17th So

SLC, Ut 84105

RESPONSE TO COMMENT 41 JAY BICKFORD

[Comment page 2]

This comment's suggestions for ACEC designation of specific areas are noted. See the response to comment 2, National Parks and Conservation Association, for a discussion of these areas.

Change to the EIS? No.

COMMENT 42

College of Eastern Utah
White Mesa Institute
639 W. 1st South 50-1
Blanding, Utah 84511
(801) 678-2201

October 26, 1986

Gentleman,

After reading your management plan it becomes apparent that you are avoiding long term "management" as indicated by item 4331 page 2-6, by the disclaimer on page 1-6 (Cultural Resource Management) stating "Accordingly this topic does not qualify as a planning issue".

Even basic business requires that planning occur before management can occur.

Furthermore you address sites ~~th~~ and areas that have allready been impacted through excavation, stabilization, vandalism and oil & gas development as areas that will be managed for future research, education, et. all. You leave no room for those pristine areas that undoubtedly exist and would be of greater value to the Researcher and "National Historic Districts"

Your planning staff may wish to obtain a recently completed review by the "Office of Technology Assessment" regarding the current status of Cultural resources (Educational through protection and education) which openly reports the lack of responsibility of federal agencies in managing our cultural resources. The GAO audit will likely bear that burden of planning (lack of) on your shoulders) again. It would seem that you are again avoiding the issues, and continuing on a path that compromises the cultural resources

Searching for understanding through cultures past and present (over)

RESPONSE TO COMMENT 42 FRED BLACKBURN

[Comment page 1]

BLM's policy and procedures for managing cultural resources are discussed on draft page 2-6 under Management Guidance Common to All Alternatives. Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives have been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

The cultural use zones established through the proposed RMP provide for all recognized management uses of cultural resources, including conservation for future use (draft pages 2-6, 3-60, figure 3-15, and table 3-9).

BLM is aware that the General Accounting Office is examining federal management of cultural resources.

It is inconceivable to me that you would refuse to address this as a planning issue. It would seem that you are leaving yourself open as suspect for the entire Management plan. I protest that you do not address this planning issue and would require that it occur before any of the plan is approved, and is signed off on.

This is a highly complex sociological and cultural issue that cannot be easily addressed, but it must be looked at intelligently and with 20-100 years of planning, and potentially other designations than now exist. It is your job to complete that task.

CC: SUWA - Clive Kincaid
Bill Lipe

Sincerely Yours,

Fred Blackburn
10/26/86

RESPONSE TO COMMENT 42

FRED BLACKBURN

[Comment page 2]

BLM is confident that the draft adequately addresses the agency's legal obligations. If this comment is intended to be a protest on the preparation of the RMP, the protest procedures explained at 43 CFR 1610.5-2 must be followed.

Change to the EIS? No.

COMMENT 43

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello UT 84535

Dear BLM,

Having had opportunity to undertake only a cursory review of the San Juan Resource Area Management Plan, I was none the less alarmed to see that the Plan places so little emphesis on preservation. Much of the land in the San Juan District is frequently visited by Coloradans such as myself who appreciate its outstanding scenic and archeological values.

Having visited the Canyonlands Basin several times, I would underscore the importance of granting ACEC status to all lands visible from both BLM and Park Service overlooks in the Basin to protect the scenic values of the area. This same area is also deserving of ONA status.

ACEC status should also be granted to the vicinity of Natural Bridges National Monument, including Harmony Flat and the lands between the Monument and the National Forest. Similarly, a 2,000 acre ACEC designation for Hovenweep National Monument is necessary in order to preserve both scenic and cultural values there.

Having spent considerable time in the Glen Canyon National Recreation Area, including the canyons north of Navajo Mountain as well as those of the Escalante, I would say that this area has suffered enough. The scenic, wildlife, and cultural values which remain in the area should be preserved.

Cedar Mesa comes to my attention as an area of highest archeological value. An ACEC with boundaries as proposed in the C & D alternatives should be adopted. Furthermore, all roadless lands near Cedar Mesa deserve ONA status. This area, like Alkali Ridge, needs ACEC protection because it is an easy target for pot hunters. (We need a full 170,320 ACEC for Alkali Ridge.)

Unfortunately, this list of suggestions is as short as my time is. I haven't had the opportunity to visit nearly all of the areas mentioned in the Plan. I always take comfort from knowing that there are many areas yet to see... I hope in a pristine state.

Generally, it would seem that according to current market conditions, southeastern Utah is not a prime development area. The sheer ruggedness of the country makes any access expensive to create. The depressed state of the energy industry, particularly Uranium, would advise against development of that nature. This market will certainly revive eventually, yet by such time, one acould expect conservation technology to have progressed to the point where it would still be economically risky to develop this area. Siting the difficulties the timber industry is experiencing in Colorado, one could hardly expect it to thrive in this part of the world. The cows and sheep of southeastern Utah may be able to boast of having some of the most scenic pastures in the country, but otherwise their lifestyle may be likened to a form of animal sacrifice.

All this would suggest that tourism holds the most promise for the local economy. This industry, of course, is based on the largest degree of preservation possible. I believe it would turn out to be the best for all of us in the long run.

Yours Sincerely,

James G. Bock
3 Nov 1986

RESPONSE TO COMMENT 43 — JAMES G. BOCK

[Comment page 1]

The proposed RMP proposes ACEC designation for several areas mentioned in this comment. See the response to comment 2 from National Parks and Conservation Association for a discussion of all areas suggested in this comment (see also revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I). BLM has dropped the ONA designation in favor of the ACEC designation.

Although the RMP/EIS assesses economic impacts from management scenarios presented in the alternatives, the Federal Government has no authority to dictate the type of economic pursuits undertaken by private developers.

Change to the EIS? No.

COMMENT 44

10/20/86

Dear Sir or Madam,

I'm submitting to you these comments on BLM's draft SAN JUAN RESOURCE MANAGEMENT PLAN (SJRMP).

It seems that every time I blink my eyes someone is trying to drive a bull-dozer or back-hoe and other similar devices through yet another precious piece of our planet. A work of art (whoever or whatever may ~~had~~ have been involved in its evolving) that is a result of long, long periods of time. And only a scattering of pieces of it, which are subjectively designated more pristine than a much larger majority of pieces designated as "expendable" in comparison, are preserved as a scattering of "museum pieces". To me it is a mortal sin, and a moral issue.

In Utah, BLM still has the opportunity to protect a large continous piece of our country's natural resource, and keep it natural. The BLM is obligated to prioritize the protection of wilderness, scenic, and recreational values in the San Juan Resource Area, especially in areas designated as primitive,

RESPONSE TO COMMENT 44

DAVID BOLES

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from the Utah Wilderness Association.

semiprimitive, and semiprimitive motorized. By prioritizing the protection of all of these areas the lands surrounding the Natural Park Units in Utah (Canyonlands, Hovenweep, Zion, Natural Bridges, Glen Canyon Recreation Area) can be managed properly to prevent the degradation of the present outstanding values of these parks. Places where, when you go there, you dont feel that just outside the area your standing in there are factories and quarries, drilling, and other activities destructive to nature and our planet in progress. Proper wilderness management should, in addition, more effectively protect Utah wilderness and natural areas from archeological exploitation.

I would like to remind the BLM of its requirement, as specified by the Federal Land Policy and Management Act, to give priority to the designation of Areas of Critical Environmental Concern (ACEC's). In addition, to accomplish these tasks, the BLM should be designating many of the ACEC areas as well as other areas as Outstanding Natural Areas in order to properly preserve their

RESPONSE TO COMMENT 44 DAVID BOLES

[Comment page 2]

Congress has determined that units of the NPS are to be managed under NPS laws, and that public lands, even those adjacent to units of the NPS, are to be managed under FLPMA and other public land laws. See the response to comment 2, National Parks and Conservation Association, for a broader discussion of this topic.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response given to comment 2, National Parks and Conservation Association, for a discussion of these areas.

BLM has dropped the ONA designation in favor of the ACEC designation.

irreplacable natural characteristics. Included in the SAN JUAN RESOURCE AREA suitable as ONAs are Canyonlands Basin, Beef Basin, Natural Bridges, Cedar Mesa, Alkali Ridge, White Canyon Complex, Moki-Red Canyon Complex, and Dark Canyon and Middle Point. Also, [redacted] Hovenweep and Glen Canyon Natural Recreation Area must a least be protected as ACEC's.

BLM can help by establishing management prescriptions to protect ACECs and ONAs by closing them to oil and gas leasing, limit ORV use, carefully regulate surface disturbing activities, restrict live stock use, land treatment, range improvements, and vegtable manipulation, stop the exploiting of the areas for woodland products, and manage ACECs and ONAs as Visual Resource Management (VRM) Class I areas.

The cultural resources of Southern Utah must be saved. Its all to precious to lose, it can never be restored. Please respond to these requests with a positive attitude and save what you have left.

Sincerely,

David Boles

400 Illinois St
GOLDEN, CO 80403

RESPONSE TO COMMENT 44 — DAVID BOLES

[Comment page 3]

For potential ACECs, BLM has prepared management prescriptions that would be needed to protect values identified as at risk (see draft appendixes A and I, as revised). See the response to comment 2, National Parks and Conservation Association, comment page 28, on this topic.

BLM recognizes the need to protect cultural resources (see draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

Change to the EIS? No.

COMMENT 45

October 28, 1986

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

Gentlemen:

I am writing you out of great concern for the fate of South Eastern Utah's Colorado River Plateau. This area is one of the premier senic, cultural, recreational and wilderness areas remaining in the U.S. It must be protected.

I urgently request that you:

1. Make it a priority to protect the senic, cultural, and wilderness values in the San Juan Resource Area.

2. Manage the lands adjacent to the National Park units in a manner that will fully protect park values.

3. Establish a meaningful program to protect the area's cultural (archeological) resources from degredation.

Some specific things that can be done to accomplish these goals are:

1. Designate the following areas as "Areas of Critical Environmental Concern" (ACEC's) to protect senic and cultural values:

   a. Canyonlands Basin
   b. Beef Basin
   c. Natural Bridges
   d. Hovenweep
   e. Glen Canyon National Recreation Area
   f. Cedar Mesa
   g. Alkali Ridge
   h. White Canyon Complex
   i. Moki-Red Canyon Complex
   j. Dark Canyon and Middle Point

RESPONSE TO COMMENT 45 CAROL S. BOSSERMAN

[Comment page 1]

In response to the comment's requests:

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

Congress did not direct that public lands adjacent to NPS units be managed to protect park values. See the response to comment 2 from National Parks and Conservation Association for a discussion of this topic.

BLM recognizes the need to protect cultural resources (see draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

In response to the comment's suggestions:

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response given to comment 2, National Parks and Conservation Association, for a discussion of these areas.

2. Designate the following areas as "Outstanding Natural Areas" (ONA's) where management of recreational activity is necessary to preserve those outstanding characteristics:

   a. Canyonlands Basin
   b. Cedar Mesa
   c. White Canyon Complex
   d. Dark Canyon and Middle Point

3. Establish management prescriptions which provide meaningful protection for ACECs and ONAs and the values they were established to protect. The ACECs and ONAs listed above should be:

   a. Closed to oil and gas leasing or, at a minimum, open to leasing with provisions to prevent surface occupancy.

   b. Limit ORV use to existing roads, except in "cultural" ACECs where some roads may need to be closed to discourage vandalism and pot-hunting.

   c. Withdrawn from mineral entry or, at a minimum, BLM should require a Plan of Operations for <u>any</u> surface disturbing action that demonstrates there will be no harm to cultural resources.

   d. Available for livestock use only if such use will not harm the values for which the ACEC or ONA was established.

   e. Excluded from land treatments, range improvements and vegetative manipulations unless it is demonstrated ACEC/ONA values won't be harmed.

   f. Excluded from private and commercial use of woodland products.

   g. Managed as a Visual Resource Management Class I area, with only those projects that meet Class I objectives allowed.

4. Amend or supplement the draft RMP to identify special management actions BLM will take to protect cultural resources, especially the estimated 200,000 archeological sites on these lands:

   a. Identify and protect areas with potential cultural values until intensive inventories and evaluations can be completed.

<u>RESPONSE TO COMMENT 45</u> <u>CAROL S. BOSSERMAN</u>

[Comment page 2]

BLM has dropped ONA designation in favor of ACEC designation.

For potential ACECs, BLM has prepared management prescriptions that would be needed to protect values identified as at risk (see draft appendixes A and I, as revised). See the response to comment 2, National Parks and Conservation Association, comment page 28, on this topic.

The proposed RMP identifies special management actions to protect cultural resources.

The draft provides for ongoing inventory of cultural resources (draft page 2-6) and protection of cultural resource sites (draft appendix A).

b. On the basis of these inventories, develop management categories and restrictive stipulations as necessary to protect cultural resources from energy exploration and development, ORV use, land treatments, etc.

c. Monitor for trend and condition changes.

d. Increase patrols and surveillance to prevent pot-hunting.

e. Increase evaluation and nomination of districts and sites for national register nomination.

The development of a "Cultural Resource Plan" will help highlight to Congress the need for additional funding for cultural resources management in the San Juan Area.

Please do everything you can to save this invaluable cultural, senic, recreational, and wilderness resource for us and for the generations to come.

Thank you.

Sincerely,

Carol S. Bosserman

Carol S. Bosserman
7760 W. 87th Drive, Unit I
Westminster, CO 80005

RESPONSE TO COMMENT 45 CAROL S. BOSSERMAN

[Comment page 3]

The draft provides special conditions for management of specific areas to protect resource values believed at risk (draft appendix A). The draft (pages 2-6, 3-60, figure 3-15, and table 3-9) also provides for establishment of cultural resource management zones based on potential cultural resource values present.

The draft provides that the RMP will be monitored (draft appendix B). Monitoring programs for specific sites would be developed under CRMPs at the activity planning stage (draft page 2-6 and table 2-7); many sites are now being monitored using photo trend studies.

The RMP provides for allocation and management of authorized uses of public lands (draft pages 1-10 and 2-1); it does not provide for management of illegal uses of public lands, or for enforcement of laws governing public resources.

The draft provides for nominations of specific cultural resource properties to the National Register (draft table 2-2). However, it is not cost-effective for BLM to nominate individual cultural properties to the National Register. Anyone, including the commentor, can make such nominations. BLM manages sites that are potentially eligible for listing in the same way as it manages sites that are listed on the National Register (draft page 2-6).

The draft (page 2-6 and table 2-7) identified areas where specific CRMPs would be developed; these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29).

Change to the EIS? No.

COMMENT 46

Oct. 30, 1986

To whom it may concern:

I'm writing in order to urge ~~[illegible]~~ the BLM to prioritize the protection of wilderness in the San Juan resource area -- especially in those areas labeled as "primitive," "semiprimitive nonmotorized," and "semiprimitive motorized." Also, there is a great importance of managing those lands surrounding these areas in a manner in which they will not be exploited. The land in the San Juan Resource area is exceedingly rich in scenic and recreational values. Should it be destroyed, it would be a tragedy.

Please give this matter the utmost attention.

Thank you,

Susan Bridges

Susan Bridges
2076 S. Fillmore
Denver, Co
80210

RESPONSE TO COMMENT 46

SUSAN BRIDGES

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Change to the EIS? No.

COMMENT 47

P.O.Box 571,
Moab, Ut 84532
Oct. 31,1986

B.L.M., San Juan Resources Area
PO Box 7,
Monticello, Ut 84535

Sirs:
"Unaccustomed as I am to public writing" I feel so strongly concerning the issues involved in the recently released San Juan Resource Area Manangement Plan that I must put myself on record about it.
I have always thought,with due cause during the past 50 years, that the BLM was impartial; that it acted in favor of controlled industrial and agricultural use of its lands, but equally in favor of the continued primitive nature and limited access of the lands under its jurisdiction.

Not so in Utah,it seems, where there is so very much at stake for both concerned sides to that picture. "Sides" that are incompatable,it seems, unless one thinks of one big common bond that both share: the love that we all have for these magnificent last wild lands of southern Utah.
When it comes to litigation to control or designate control of the policies involved with this land, it is a terrible waste of monies, energies, and intelligent minds that could all be put tosuch better constructive use elsewhere.....such as:
Example: plans and monies for this "currently inadequate cultural resource management".
Example: for the currently inadequate enforcement of the " Archeological Resources Protection Act".
Example: for protecting rather than desecrating the non-motorized primitive and wilderness study-designated areas.
What good are statements,studies,plans, and volumes of coordinated material if detrimental pressures can force them down the drain?

For years I have reverently trod, floated and camped in the San Juan backcountry. I've seen the Music Temple before Lake "Foul" inundated it; looked with awe on the ruins, petroglyphs and soaring cliffs of the Grand Gunch and Escalante depths; driven the Burr Trail in my old station wagon (with my heart in my teeth but stars in my eyes!) years before it became a Del Webb issue; and gloried in the many backpacking trips spent exploring the parks and canyons in and around Canyonlands National Park.

How can anyone say that oil,gas or other interests are of more value than that, especially when wells are being capped faster than new wells can be dug, import ores are cheaper than the ores we hold in the ground here, and when much of the over-grazed lands are just coming back?

So, inexperienced as I am in voicing protests of this nature, I do it just as one more vote for "Leave it as it is" for future generations to use and enjoy.

Most sincerely yours,

Gale Burak

Mrs Gale Burak

RESPONSE TO COMMENT 47 — MRS. GALE BURAK

[Comment page 1]

The RMP is a land-use plan, intended to guide management of public lands in SJRA. It derives from laws and BLM policy, but cannot be used to change those overlying policies.

Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Change to the EIS? No.

COMMENT 48

571 East 500 North #3
Logan, Ut 84321
Jul 24, 1986

BLM
Monticello, Utah

Dear Sir:

I would like comment on the San Juan Resource Management Plan.

As a devout lover of wild country, I urge you to prioritize the protection of aesthetic and natural values of the area. If the area borders a National Park, I believe all the more concern should be given to these recreational values.

I have visited the Natural Bridges area and learned of the abuse of cultural (and other) resources in the Cedar Mesa, Valley of the Gods, and Alkali Canyon areas. I hope that these vulnerable areas can receive ACEC and/or ONA protection. I am an Anthropology student, and I very much appreciate these Anasazi ruins. Please protect them so others can too. Hearing of these irresponsible societal menaces

RESPONSE TO COMMENT 48

RICHARD CAMPANELLA

[Comment page 1]

Protection of aesthetic and natural values in proximity to an NPS unit is discussed in the response to comment 2, National Parks and Conservation Association.

The Cedar Mesa, Valley of the Gods, and Alkali Canyon areas are proposed for ACEC designation in the proposed RMP, because of supporting information provided in other comments. (See revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I).

stealing these artifacts — and destroying them — infuriates me.

I believe the BLM should recognize the protection of these cultural resources as a planning issue.

Please protect these lands that so many love.

Sincerely,

Richard Campanella

RESPONSE TO COMMENT 48 RICHARD CAMPANELLA

[Comment page 2]

Protection of cultural resources, along with the reasons why management of cultural resources did not qualify as a planning issue, is discussed in the response to comment 2, National Parks and Conservation Association.

Change to the EIS? No.

2801 Paque de Oeste #3 COMMENT 49
Farmington, NM. 87401
November 2, 1986

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

Dear Sirs,

I am writing you to comment on your draft Management Plan for the San Juan Resource Area. I am a frequent visitor to Southeast Utah, and use both public domain and the National Parks for outdoor recreation.

First off, I urge you to manage BLM lands, which are adjacent to National Park lands, in a manner which is compatible with and protective of park values. Much of the San Juan Resource Area contains lands with important cultural, scenic and wildlife resources. Since these lands need extra care and management, designation as Areas of Critical Environmental Concern (ACECs) is appropriate for the following areas:

(over) →

RESPONSE TO COMMENT 49 JOSEPH V. CHIARETH

[Comment page 1]

Congress did not direct that public lands adjacent to NPS units be managed to protect park values. See the response to comment 2 from National Parks and Conservation Association for a discussion of this topic.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I).

- 2 -

1.) Canyonlands Basin

- I support an ACEC to protect scenic values for all BLM lands in the Canyonlands Basin which are visible from within the Park or from the Hatch Point overlooks. Scenic views are very important to visitor enjoyment of the Park. Adopt alternative C which recommends a scenic ACEC for the Lockhart Basin.

2.) Beef Basin

- I support an ACEC to protect scenic values for lands, south of Canyonlands lying between the Park, the Manti-La Sal National Forest and the Dark Canyon Plateau, which are visible from the Park.

3.) Alkali Ridge

- I support a boundary consistent with the 170,320 acre Alkali Ridge ACEC proposed under alternative D to protect the areas vulnerable cultural values.

RESPONSE TO COMMENT 49 JOSEPH V. CHIARETH

[Comment page 2]

The ACEC nominations for specific areas are accepted. See the response to comment 2, National Parks and Conservation Association, for a discussion of these areas. See revisions to draft summary, chapters 2, 3, and 4, and appendixes A, H, and I.

-3-

4.) Cedar Mesa

-The Cedar Mesa - Comb Ridge area is very important to me. I visit this region often every year. Therefore, I support an ACEC to protect cultural, scenic and natural values. I support a boundary consistent with the archeological district proposed for designation under alternatives C and D. Cultural values are significant in this entire area and need protection.

It seems to me that cultural resource protection is not adequately addressed in the draft RMP. If the San Juan Resource Area is one of the richest locales, archeologically, under BLM management, then cultural resource management and protection is an important planning issue. The draft RMP needs to be amended to identify special management actions which you will take to protect cultural resources in the SJRA

RESPONSE TO COMMENT 49 JOSEPH V. CHIARETH

[Comment page 3]

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion of the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

BLM recognizes the need to protect cultural resources (draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The preferred alternative provides several special designations for cultural resources (see draft tables 2-2 and 2-6, both as revised). Special designations alone do not guarantee a particular level of management. (Stipulations for management of the special designations proposed for the RMP are given in draft appendix A.)

For instance: a.) identify and protect areas with cultural values until intensive inventories can be completed

b.) develop management categories and restrictive stipulations to protect cultural resources from energy development, ORV use and large-vegetative treatments.

These are only some of the special actions which need to be addressed in the RMP and is in no way an exhaustive list. If the San Juan Resource Area is understaffed and underfunded for cultural resource management, then developing a plan will call attention in Washington to the need for additional funding to correct the problem.

Before I forget Cedar Mesa, I would also support designation of an Outstanding Natural Area (ONA) for all roadless lands in the Cedar Mesa ACEC.

Thank you very much for your attention to these requests.

Sincerely,

Joseph V. Chiareth

RESPONSE TO COMMENT 49 — JOSEPH V. CHIARETH

[Comment page 4]

In response to specific suggestions:

The draft provides for ongoing inventory of cultural resources (draft page 2-6) and the protection of cultural resource sites (draft appendix A).

The draft also provides that cultural resource management zones would be established (draft page 2-6, 3-60, figure 3-15, and table 3-9); these zones are based on potential cultural resource values present. The draft provides special conditions for management of specific areas to protect resource values believed at risk (draft appendix A).

Congress is aware of BLM's projected funding needs; Congressional funding is based upon many factors (see response to comment 22, Environmental Protection Agency, comment page 8, on this topic).

BLM has dropped the ONA designation in favor of the ACEC designation.

Change to the FIS? Yes.

To Whom it May Concern,

COMMENT 50

I am writing to urge you to protect SouthEastern Utah's unique resources from degradation.

Specifically, this area's archeological resources should be protected from degradation In the San Juan Resource Management plan (draft) it is noted that " protection of cultural resources is inadequate to ensure their availability ~~for the San Juan Resource~~ for all proposed uses now and in the future "

RESPONSE TO COMMENT 50

KRIS CHICK

[Comment page 1]

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The draft identified areas where specific CRMPs would be developed (draft page 2-6 and table 2-7); these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29).

-2-

Bearing this in mind, I recommend strongly that cultural resource protection should be a planning issue recognized by the draft SJRMP. I also urge you to ammend or supplement the draft RMP to identify actions to be taken by the BLM which will protect these valuable cultural resources. These actions

RESPONSE TO COMMENT 50 KRIS CHICK

[Comment page 2]

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion of the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

-3-

Should include:

1) The identification and protection of areas with potential cultural values, until intensive inventories and evaluations can be completed.

2) Protect identified valuable areas from degradation (from energy exploration, ORV use, etc.)

3) Monitor areas for changes.

4) Crack down on pot-hunters by increasing patrols.

5) Increase evaluation and nomination of districts and sites to national register.

RESPONSE TO COMMENT 50 KRIS CHICK

[Comment page 3]

In response to suggestions made in this comment:

1. The draft provides for ongoing inventory of cultural resources (page 2-6) and the protection of cultural resource sites (appendix A). The draft also provides that cultural resource management zones would be established (page 2-6, 3-60, figure 3-15, and table 3-9); these zones are based on potential cultural resource values present.

2. The draft (appendix A) provides special conditions for management of specific areas to protect resource values at risk.

3. The draft (appendix B) provides that the RMP will be monitored. Monitoring programs for specific sites would be developed under CRMPs at the activity planning stage (draft page 2-6 and table 2-7); many sites are now being monitored using photo trend studies.

4. The RMP is a land-use plan; it provides for allocation and management of authorized uses of public lands (draft page 1-10 and 2-1). It does not provide for management of illegal uses of public lands, or for enforcement of laws governing public resources.

5. The draft (table 2-2) provides for nominations of specific cultural resource properties to the National Register. However, it is not cost-effective for BLM to nominate individual cultural properties to the National Register. Anyone, including the commentor, can nominate cultural sites to the National Register. BLM manages sites that are potentially eligible for listing in the same way as it manages sites that are listed on the National Register (draft page 2-6).

-4-

In addition to protecting cultural resources, I urge you to manage lands adjacent to NPS lands in a manner completely compatible with Park values of preservation.

Thank You,

Kris Chick
942 Howard E.
Seattle, WA.
98102

RESPONSE TO COMMENT 50 KRIS CHICK

[Comment page 4]

Congress did not direct that public lands adjacent to NPS units be managed to protect park values. See the response to comment 2 from National Parks and Conservation Association for a discussion of this topic.

Change to the EIS? No.

COMMENT 51

10-28-86

Doug Chinn
2274 S. 1800 E.
Salt Lake City, UT 84106

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, UT 84535

Sir,

I am writing to express my concern about the San Juan Resource Area Management Plan. The area is very rich in cultural, scenic and wild areas. Protection of these areas from air pollution, vandalism and OFF road vehicles is very important. Pot hunters and ORV's can only destroy, and all efforts must be taken to preserve the land for the future, for the archaeological use and for wildlife. You must develop a cultural resource plan to highlight these wonders to Congress.

Lands that are adjacent to the National Parks need to be managed to protect the parks. We do not need to allow current greed to set up management problems like those that now exist at Yellowstone. As the FLPMA states, priority is to be given to to the designation of ACECs. All surface disturbances need to be kept to a minimum within the SJRA.

Thank you

Doug Chinn

RESPONSE TO COMMENT 51 DOUG CHINN

[Comment page 1]

BLM agrees that cultural sites are an important resource in SJRA. The draft provides for CRMPs to be developed for management of specific cultural resource properties or districts (draft page 2-6 and table 2-7).

Congress has determined that NPS units are to be managed under NPS laws, and that public lands, even those adjacent to NPS units, are to be managed under FLPMA and other public land laws. See the response to comment 2, National Parks and Conservation Association, for a broader discussion on this topic.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). The management provisions in appendix A are believed adequate to manage surface disturbance in SJRA.

Change to the EIS? No.

COMMENT 52

5 Timber Lane
Evergreen, Colorado 80439
November 1, 1986

Dear BLM:

It is absolutely essential that BLM be fair, just and responsible in determining the future of the San Juan Resource Area. This is a unique and fragile area and its welfare is in your hands. Once this area is opened up to development it can never be fully restored; therefore, as much land as possible must be preserved to insure that the resources will be protected.

I am especially concerned that the wilderness, scenic, and recreational values be made a high priority, particularly for those areas with the designation "primitive," "semiprimitive nonmotorized," and "semiprimitive motorized." Specificallly, it is very important that Beef Basin be set aside as an Area of Critical Environmental Concern both for its scenic and its cultural values. If the U.S. Government has gone to all the trouble to set aside Canyonlands as a national park it only makes sense to insure that the land surrounding the park which is visible from it should be protected in its natural state. Cultural values should be protected for all lands between Canyonlands, the Manti-La Sal Forest, and Dark Canyon. I spent a wonderful week near Beef Basin, in Gypsum Canyon, in May 1985 and was overwhelmed by the solitude and pristine beauty of the area. In addition, the cultural, scenic, and natural values of the Cedar Mesa area must all be protected as proposed under Alternatives C & D. There are no other areas in the West with as many archaeological sites and artifacts as Cedar Mesa.

It is critical that many other areas be designated Outstanding Natural Areas. These include all lands in the Canyonlands Basin, all roadless areas in the Cedar Mesa ACEC and the White Canyon Complex.

Please do the right and decent thing for this land that has been entrusted to your care and for the future of this country. Thank you very much.

Sincerely,

Nina Churchman

Nina Churchman

RESPONSE TO COMMENT 52 NINA CHURCHMAN

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Regarding the comment on management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association. BLM recognizes the need to protect cultural resources (see draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response to comment 2, National Parks and Conservation Association, for a discussion of these areas.

BLM has dropped the ONA designation in favor of the ACEC designation.

Change to the EIS? No.

OCTOBER 31, 1986

COMMENT 53

To whom it may concern:

I would like to urge the BLM to prioritize the protection of wilderness, scenic and recreational values in the San Juan Resource Area, especially in areas BLM identifies as "primitive", "semiprimitive nonmotorized," and "semiprimitive motorized."

I urge the BLM to manage lands adjacent to the National Park units (Canyonlands, Hovenweep, Natural Bridges, Glen Canyon National Recreation Area) in a manner that will fully protect park values.

I also wish to urge the BLM to establish a meaningful program to protect the area's cultural (archeological) resources from degradation.

Thank you -

Sincerely,

Meredith Cox
Box 641
Dillon CO 80435

RESPONSE TO COMMENT 53

MEREDITH COX

[Comment page 1]

Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Regarding the comment on management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association.

BLM recognizes the need to protect cultural resources (draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

Change to the EIS? No.

COMMENT 54

Ed Scherick, Area Manager
San Juan Resource Area
BLM, P.O. Box 7
Monticello, UT, 84535

Dear Mr. Scherick;

I have the following comments on the Draft RMP and EIS for the San Juan Resource Area. I approach this document from the viewpoint of one who has visited a number of BLM WSA's in Colorado, and one who values very highly the esthetic and wildlife values of BLM recreational and wilderness-quality lands.

The SJRA is one that is heavily used for recreation by people from the Four-Corners area as well as from the whole country. Particularly in demand is the "primitive and unconfined recreation" that is present on many BLM lands. The document itself states that usage will increase over time substantially, and that even now it threatens to diminish the very primitive qualities that many recreationists seek. Therefore it appears that outside of established WSA's, additional areas will have to be designated for recreational purposes, and yet the agency is proposing no new such special designations. I would urge the BLM to examine additional lands for primitive recreational purposes in the Final Plan.

The second important issue in the SJRA RMP is the protection of cultural resources. The necessity for doing this is evident not only in the SJRA, but also in resource areas in neighboing states. Yet the problems with the enforcement of the Antiquities Act are well known and a record of shame for the Government in general and the BLM in particular. The RMP appropriately recognises the importance of cultural resources, yet proposes too little in the way of protective action. In particular, BLM's plans for resource protection, such as they are, are not consistent with those of adjacent Park Service lands. BLM needs to consider special management areas and other tools; I would suggest some study of the RMP for SW Colorado, where the BLM has proposedand is implementing a more aggressive program of protection and law enforcement. We cannot allow 2000+ years of SW human history to be obliterated by greedy and/or ignorant vandals!

Thanks very much for your consideration of these opinions.

Sincerely,
Kirk Cunningham
680 Tantra Dr. Boulder, CO, 80303

RESPONSE TO COMMENT 54 KIRK CUNNINGHAM

[Comment page 1]

Under alternatives C and E in the draft, special conditions were used to ensure protection of ROS classes, including areas used for primitive recreation. Many of these areas are outside of WSAs or ISAs (see draft pages S-4, 2-12, 2-13 through 2-14, 2-16, 2-56, A-13 through A-14, and A-24 through A-25). Designations of SRMAs and developed recreation sites were proposed under all alternatives; many of these would facilitate primitive recreational use (see draft page 2-49).

BLM recognizes the need to protect cultural resources (see draft page 2-6). The RMP team was aware of the management stipulations imposed in southwestern Colorado by the San Juan/San Miguel RMP (see draft page 5-7). Special designations alone do not guarantee a particular level of management. A comparison of the management actions allowed under the San Juan/San Miguel RMP and the preferred alternative of this draft does not necessarily show that southwestern Colorado has a "more aggressive" program of cultural resources management.

Management prescriptions for the area around Hovenweep NM, adjacent to the San Juan/San Miguel RMP area, have been changed in the proposed RMP and final EIS to comply with a request from NPS (see response to comment 28, National Park Service, Rocky Mountain Regional Office).

Change to the EIS? No.

October 30, 1986

COMMENT 55

Ed Scherick, Manager
San Juan Resource Area
BLM, P.O. Box 7
Monticello, UT 84535

Dear Mr. Scherick:

I am writing to voice my grave concerns regarding your recently released Draft Resource Management Plan / Environmental Impact Statement for the San Juan Resource Area. Your proposal is totally inadequate in terms of protecting the unique primitive recreational opportunities and archaeological resources that attract people like me to that area.

Your agency has ignored its own management plan for the Grand Gulch Plateau in the recent plan. The past Grand Gulch plan recognized the various cultural resources there as rare and not only regionally but nationally significant. Please re-read your own research documents before following this latest, ill-conceived plan!

I travel to Utah every year to special places like Bullet and Slickhorn Canyons to experience the history, spirituality and silence -- I've backpacked alone on occasion -- that

RESPONSE TO COMMENT 55

THERESA M. DONAHUE

[Comment page 1]

This RMP/EIS supersedes proposals made in the 1980 draft Grand Gulch Plateau Management Plan. See comment 9, Southern Utah Wilderness Alliance, on this topic. See also appendix AA to the final EIS.

cannot be found in other places in our country. It is indeed a vital, necessary part of America.

However, the solitude and heritage of these canyons are already threatened and will be devastated if your recent plan is implemented. Again, your own studies show that the primitive and semi-primitive non-motorized areas are in the most demand and the demand will increase dramatically in upcoming years.

That demand and increased use can be verified with a call to any of your people. On several occasions I have called your local offices to inquire about which canyons I should try if I really want a primitive, wilderness experience away from the crowds. I've generally been given one or two ideas but I've been warned about how popular and crowded they are becoming.

Your proposal is not only foolish in the long run but in the near future. Therefore, I am asking and urging you, as a taxpaying U.S. citizen who loves the San Juan Resource Area, to:
1) designate areas of critical environmental concern and other special management areas required to protect our cultural resources and 2) to provide the special

RESPONSE TO COMMENT 55 THERESA M. DONAHUE

[Comment page 2]

Under the draft preferred alternative, Slickhorn and Bullet Canyons would be managed as part of the Grand Gulch proposed ACEC; under the proposed RMP, part of the Cedar Mesa proposed ACEC. Under either proposal, no surface disturbance of these areas would be allowed, and they would be segregated from mineral entry. BLM does not agree that these canyons would be "devastated" under the preferred alternative.

BLM agrees that there is increasing demand for primitive and semiprimitive recreation opportunities within SJRA (draft page 3-66).

In response to this comment's specific requests:

1. The proposed RMP provides for designation of several areas as ACECs to protect cultural resources (see revisions to draft chapter 2 and appendix I); it also provides for cultural use allocation zones (draft page 2-6) and development of CRMPs (draft page 2-6 and table 2-7).

2. The management provisions in appendix A are believed adequate to manage surface disturbance in SJRA. The proposed RMP provides for designation of several areas as SRMAs. An ACEC cannot be designated solely to protect recreational values. However, the proposed RMP provides for designation of several areas as ACECs to protect scenic and natural values important to recreation uses (see revisions to draft chapter 2 and appendix I).

designations and stringent management stipulations needed to protect our primitive recreation sources. Enforce the existing protection acts vigorously.

Please reconsider the myopic view taken in your draft plan. It would destroy that unique area of our country.

Sincerely,

Theresa M. Donahue

Theresa M. Donahue
4131 Hooker Street
Denver, CO 80211

RESPONSE TO COMMENT 55 THERESA M. DONAHUE

[Comment page 3]

BLM agrees that existing laws should be enforced (draft page 2-1).

Change to the EIS? No.

COMMENT 56

October 31, 1986

Bureau of Land Management
San Juan Resource Area
Po Box 7
Monticello, Utah, 84535

Dear Sirs,

This is a request for you to recognize the importance of the archeologic sites in your region and adjust your planning for their future accordingly. This resource needs to be protected from further damage for the use of all Americans both as a recreational, and scientific sites. We do a major injustice to all cultures by not making it possible to study the remains of these ancient civilizations.

Management for these sites needs to inventory and evaluate what sites are valuable and make nominations for national register. Also, these areas need to be protected from damage by mining recreation, or vandalism. This requires increased patrols and surveillance, and more funding and manpower. To close areas to grazing, ORV use, oil & gas leasing, mineral withdrawal, forest harvesting, would insure these areas are not damaged.

The area around the Canyonlands Park needs especially to be recognized for protection as an area of critical environmental concern. Include with this the Hatch Point Cliffs and Needles and Canyonlands overlooks, and Lockhart Basin. Please protect in the area all of the Canyonlands Basin the archeologic sites by designating them

RESPONSE TO COMMENT 56 — LLYN DOREMUS

[Comment page 1]

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The draft provides for ongoing inventory for cultural resources (draft page 2-6) and the protection of cultural resource sites (draft appendix A).

The draft provides for nominations of specific cultural resource properties to the National Register (draft table 2-2). BLM manages sites that are potentially eligible for listing in the same way as it manages sites that are listed on the National Register (draft page 2-6).

The RMP provides for the allocation and management of authorized uses of public lands (draft page 1-10 and 2-1); it does not provide for management of illegal uses of public lands, or for enforcement of laws governing public resources.

Congress did not direct that public lands adjacent to NPS units be managed to protect park values. See the response to comment 2 from National Parks and Conservation Association for a discussion of this topic.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response to comment 2, National Parks and Conservation Association, for a discussion of these areas.

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as Outstanding Natural Areas. Areas visible from the park need protection also in Beef Basin, Dark Canyon Plateau, Cathedral Butte and the region between these and the park. They too need designation as ACECs. Archeologic sites in Dark Canyon require ONA status protection also.

The Havenweep 2000 acre area of critical environmental concern should be considered as part of the already existing park. Please consider the alternative that protects this entire area's cultural resources.

The Glen Canyon Park has important cultural and wildlife resources that need to be protected by designation as ACEC. Alkali Ridge too needs protection that includes the entire 170,000 acre region. Please consider the Moki-Red Canyon region and the cultural resources there as important enough to be studied further, and so designate them as ACEC.

Cedar Mesa is already recognized as having valuable archeologic sites and need protection as soon as possible to prevent further destruction. ONA designation is required here, and in the White Canyon Complex.

Please consider the value of all these areas to people of the U.S. today, and in

RESPONSE TO COMMENT 56 LLYN DOREMUS

[Comment page 2]

BLM has dropped the ONA designation in favor of the ACEC designation.

3.

the future. By not recognizing the importance of the Archeologic Information in these sites today, you preclude the possibility of anyone ever researching these areas further. We cannot be so blind and short sited to so limit human knowledge and understanding. You are entrusted ~~of~~ to recognize this in managing these lands. Please do so, and carry out that ~~respon~~ responsibility.

Thank you,

Llyn Doremus
759 E 100 N
Logan, Utah
84321

RESPONSE TO COMMENT 56 LLYN DOREMUS

[Comment page 3]

The draft (page 2-6, 3-60, figure 3-15, and table 3-9) provides for establishment of cultural resource use management zones based on potential cultural resource values present. Conservation is one type of management objective (see revisions to draft page 2-6).

Change to the EIS? No.

COMMENT 57

10/25/86

Moab, UT 84532-0084

Some comments on the San Juan Resource Management Plan. I feel the need to make many because I see an opportunity (in archaeology and for future visitors to SE Utah) that you in your management plan did not. I do not understand not developing a cultural resource plan as part of your overall management plan. I know that insufficient staff and funds are a problem, but how is this problem to be overcome without the facts presented by you? A cultural resource plan developed by you (however small) would at least reveal the situation to Congress... FLPMA requests the development of interdisciplinary comprehensive plans to guide yourselves (ourselves) with. How can you set the cultural aspect aside when it saturates the entire San Juan Resource Area? You yourselves admit it "...is one of the richest locales under BLM management..."and that"...the rates of disturbance and destruction of cultural resources appear to be accelerating..."

Please amend the resource management plan identifying and protecting all areas of potential cultural value until comprehensive inventories and evaluations can be completed. I further request that ~~that~~ from such data management categories and necessary restrictions (ie camping) be set in place and enforced to protect such areas. I believe cultural resources to be our most precious heritage, above and beyond all else. I am not alone. There are many the world over who would really marvel at the thought of seeing signs of the endemic peoples in their land to such a degree as we do see here in SE Utah. Also, I am not alone in prefering to see our public lands (especially these semi-desert, fragile lands), our heritage, protected fully now, to let future generations have a choice during their time as to how they will use them. Only such documents as your resource planning can give this choice.

FLPMA commands to take into account the long-term needs of future generations and

RESPONSE TO COMMENT 57 JAMES DRYER

[Comment page 1]

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The draft identified areas where specific cultural resource management plans would be developed (draft page 2-6 and table 2-7); these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29). As a result of public comment, the discussion of the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6).

Congress appears to be aware of the situation regarding cultural resource management. In 1987 the Government Accounting Office is to provide Congress with a detailed account of cultural resource management on public lands. The San Juan RMP will provide BLM with an interdisciplinary comprehensive land management plan, as required by FLPMA. Neither the draft nor the proposed RMP sets cultural resources aside (see, for example, cultural resource management prescriptions on page 2-6, table 2-7, A-5, and A-23).

The draft indicates that ongoing inventories and evaluations will be made and that cultural resources identified will be protected to the full extent of the law (draft page 2-6). As stated in the draft, the entire SJRA contains significant cultural resource sites (draft page 3-60). The proposed RMP would place special designations on areas of special significance and areas believed to be at risk, or propose such areas for nomination to the National Register. Further, SJRA was divided into cultural resource zones to focus BLM management on specific uses (draft pages 2-6, 3-60, figure 3-15 and table 3-9).

that scientific and historical values are included (quoted from FLPMA). The archaeological wealth that lies just beneath the surface (yes, information, not $) in places like Beef Basin, Alkali Ridge, Hovenweep, Glen Canyon, Dark Canyon, White Canyon, Red/Moki drainages over to Glen Canyon and, of course, Cedar Mesa from Comb Ridge west, beyond Grand Gulch is high on the list of valuable resources of these areas. FLPMA points out, the values we see in these areas are "...not necessarily...(the) uses that will give the greatest economic return..." but then again these lands, as mandated, are being retained in federal ownership for the benefit of the entire nation. Hopefully the nation will continue and maybe future citizens will be thankful to visit someplace where, give or take a half dozen cattle and some natural decay, it is still as it was left a thousand years ago. Or maybe they will visit a reconstructed village of Basketmakers in Beef Basin that was excavated and put on display in the 1990s. Yes, with talk like this I am asking for more patrols to prevent thefts of our treasures from antiquity. Also from the increased funding due to your well done cultural resource management plan I want monitoring done to note impacts to rock art, structures and general change in condition of archaeological sites.

In the general management plan for Glen Canyon(11/79), within the cultural management plan it states: 1) Glen Canyon sites reveal evidence of the meeting of the Fremont, the Kayenta Anasazi, the Mesa Verde Anasazi and the Desert Archaic. 2) Artifacts represent a wide range of trade activity. 3) Four distinct periods of rock art are represented. 4) Several sites are easily accessible and are important for the visitors enjoyment of the overall NRA. 5) Many of the sites are even more important in their scientific value. There is great potential to acquire a range of cultural information spaning a long period of time.... They go on to say that less than one percent of their lands have been inventoried. How-

RESPONSE TO COMMENT 57

JAMES DRYER

[Comment page 2]

BLM agrees that, in places, cultural resource management provides the highest and best use of public lands.

BLM is also concerned with enforcement of laws protecting cultural resources. However, the RMP is a land-use management plan which provides for the allocation of multiple uses under law (draft page 1-10). The RMP does not plan for illegal resource uses, or provide an appropriate forum to resolve administrative concerns such as funding and personnel needs (draft table I-2 and figure I-3).

All cultural resource sites believed to be at risk for vandalism are currently being monitored. Increased levels of site monitoring may be called for in the cultural resource management activity plans discussed earlier.

ever, they do not stop here, but go on to state what they would like to see come of these things (ie National Register of Historic Places). Lake and Moki Canyons they have on their proposed list of this register, among seven others. These proposed archaeological districts that are in your jurisdiction of grazing and mining in GCNRA, as well as yours outside the NRA, I would ask that you treat as though already with such status and not allow mining (mineral entry). I expect a list of proposals to the NRHP from you in the near future. Specifically, amongst your area of jurisdiction, I request that ACECs be designated at Hovenweep (2000 acre buffer zone) as you propose under alternative D, Cedar Mesa with boundary consistant with archaeological district proposed (larger than your alternative D ONAs)--from Comb Ridge west, including all lands to your proposed Grand Gulch ONA, Glen Canyon, Red/Moki Canyon Complex (including upper drainages of Red, Cedar, Lake, Moki, Forgotten Canyons and North Gulch) information here could aid our understanding of the archaeology under Lake Powell..., Natural Bridges (buffer zone including Harmony Flat and the lands between NBNP and the national forest) White Canyon Complex (area between NBNP buffer zone, U 95, GCNRA, Dark Canyon and national forest), Dark Canyon and Middle Point(Middle Point is a must due to its pristine state and view from Canyonlands), Beef Basin (from the SE corner of Canyonlands NP and the Abajos, the whole pocket over to GCNRA and Gypsum (Dark Canyon ONA) Canyon) due to the view from Canyonlands and cultural values and the Canyonlands Basin (lands SE and S of Deadhorse Pt, Lockhart Basin and areas west of Hatch and Harts Points), which would protect lands seen from the overlooks as well as the lower portions of Lavender and Davis Canyons, essential additions to the Salt Creek Archaeological District--coincides with your North Abajo ACEC... This would buffer, then, Canyonlands south and east sides. I think this is very important in light of many park problems, therefore the buffer zone approach is very useful. Also, I believe the BLM should move to use other designations that are useful to the resource values that their lands hold, such as scenic, cultural, natural, re-

3

RESPONSE TO COMMENT 57 JAMES DRYER

[Comment page 3]

BLM does not manage cultural resources on Glen Canyon NRA, or on any other NPS unit (draft page I-10). Therefore, no consideration has been given in the proposed RMP to management of cultural sites on NPS lands.

Under draft alternative D, consideration was given to closing areas adjacent to Glen Canyon NRA, mentioned in this comment, to mineral entry. The resulting impact analysis did not indicate that an appreciable benefit to cultural resources would accrue (draft chapter 4), and this management prescription was not carried into the preferred alternative.

BLM discussed the potential for nominating cultural resource sites to the National Register in the draft (page 2-6 and table 2-20).

The proposed RMP proposes ACEC designation for several areas mentioned in this comment. See response to comment 2 from National Parks and Conservation Association for a discussion of all areas suggested in this comment (see also revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I).

Congress did not direct that public lands be left unimpaired to buffer NPS-administered areas, or to preserve park values. See the response to comment 2, National Parks and Conservation Association, for a discussion of this topic.

Special designations alone do not guarantee a particular level of management. In proposing special designations, BLM has selected areas where resource values are at risk, and which would benefit from special management. Since the draft was prepared, BLM has revised its policy on special designations; some designations previously used, such as RNA, have been incorporated in the ACEC designation.

creational and historic in order to prioritize the protection of same. I support ONA designation for Canyonlands Basin, Cedar Mesa, the White Canyon Complex and Dark Canyon and Middle Point with aforesaid boundaries.

Finally, to give the type of protection such high values deserve, I ask that these ACECs and ONAs be closed to oil and gas leasing, withdrawn from mineral entry, ORV use be limited to existant roads (except in cultural valued ACECs where they would not be allowed and roads would be closed to all motorized traffic), available for livestock only if that use will not harm the values for which the ACEC or ONA was established, excluded from land treatments, range improvements & vegetative manipulations, excluded from any use of woodland products and managed as a Visual Resource Management Class I area, if set up due to scenic values.

All of you are to be highly commended for your work on the draft SJRMP. Thank you for your time. Please do consider the above in the light that a future generation may then have a choice and what that means to <u>you</u> to have or not have a choice....

Sincerely,

James Dryer

"...unborn generations have a claim on the land equal to our own..."

--Stuart Udall

'62

RESPONSE TO COMMENT 57 JAMES DRYER

[Comment page 4]

This comment's suggestions regarding management prescriptions for ACECs have been reviewed. The draft applied the least-limiting level of restriction neccessary to resolve resource conflicts. IBLA has directed that the level of management imposed on an area should be the minimum level needed (see 76 IBLA 395 (1983)).

Change to the EIS? No.

COMMENT 58

Leo M. Eisel
Rt. 7 Pine Valley
Evergreen, CO 80439
October 30, 1986

Bureau of Land Management
San Juan Resource Area
PO Box 7
Monticello, Utah 84535

Re: Comments on BLM's Draft San Juan Resource Management Plan

Dear BLM:

I would like to take this opportunity to urge the BLM to designate the Beef Basin area as an ACEC to protect scenic values for the lands south of Canyonlands National Park lying between the Park, Manti-La Sal National Forest and the Dark Canyon Plateau which are visible from the the Park. This would include portions of Beef Basin, Dark Canyon Plateau and Cathedral Butte. These scenic views are important to visitor enjoyment of Canyonlands National Park. This area is also an extremely beautiful and enjoyable area for wilderness travel and recreation. I have driven my four-wheel drive vehicle into this area in order to hike into Gypsum Canyon and consequently am somewhat familiar with this area and its rugged beauty. I urge that you protect this scenic resource.

I also urge that you designate an ACEC to protect cultural values for all lands between Canyonlands National Park, the National Forest, and Dark Canyon. This area includes areas proposed for archaeological district designation (Beef Basin and Fable Valley) under alternative C, but not adopted under BLM's preferred alternative E.

I urge BLM to support designation of the Dark Canyon and Middle Point area as an ACEC to protect scenic, natural and cultural values. The importance of this area derives from pristine character of outstanding natural and scenic values. Under BLM's preferred alternative E, a Dark Canyon ACEC is adopted, but Middle Point is not included. I urge you to adopt the entire area as an ONA.

Finally, I urge you to support an ACEC to protect cultural, scenic, and natural values for the Cedar Mesa area. I urge you to adopt a boundary consistent with the archaeological district proposed for designation under alternatives C and D (but not adopted in BLM's preferred alternative E). I have hiked in the Grand Gulch, Fish and Owl Creeks area and urge you to give this area maximum consideration.

Thank you for the opportunity to comment.

Sincerely,

Leo M. Eisel

RESPONSE TO COMMENT 58 LEO M. EISEL

[Comment page 1]

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response to comment 2, National Parks and Conservation Association, for a discussion of these areas.

BLM has dropped the ONA designation in favor of the ACEC designation.

Change to the EIS? No.

COMMENT 59

TO WHOM IT MAY CONCERN

It is my understanding that BLM is planning to treat land on Cedar Mesa to improve grazing. a lot of this land lies in wilderness study areas, and this kind of treatment would alter these areas dramaticly. Cedar Mesa is rich in archeological sites that could be damaged. Cedar Mesa's wilderness brings many tourists that spend their money in southern Utah and BLM should consider what kind of effect this would have on tourism.

I used to live in Southern Utah and will probably live there again. I would like to see Cedar Mesa remain wild. It is an outstanding natural area that deserves protection. Please do what you can to preserve Cedar mesa.

THANK YOU

KEVIN EMMERICH
1015 BARBARA PL #B
S.L.C., UT.
84102

RESPONSE TO COMMENT 59 KEVIN EMMERICH

[Comment page 1]

The draft (page 1-2) discusses management of WSAs and ISAs if released from wilderness review by Congress. The RMP/EIS does not discuss management of areas while under wilderness review; these areas will be managed in accordance with IMP. No attempt was made through the RMP to apply quasi-wilderness protective management to areas released from wilderness review.

The potential land treatments shown in the draft are areas that are physically suitable for land treatments, not scheduled projects. The draft has been revised to clarify this, and to indicate that priority would be given to maintaining existing land treatments before new treatments are made (see revisions to draft pages 2-6 and 2-68).

Land treatments would be possible over much of Cedar Mesa. (Management prescriptions for most of Cedar Mesa have changed due to the proposed Cedar Mesa ACEC; see revsions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.) The NEPA document prepared for a specific project (draft pages 2-1, A-1 and A-29) would identify mitigation for adverse impacts to other resource values, such as cultural resources, wilderness values or economic considerations.

Change to the EIS? No.

COMMENT 60

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, UT 84535

Oct. 30, 1986

Sirs:

I urge you to designate Canyonlands Basin, Beef Basin, Natural Bridges, Cedar Mesa, Glen Canyon NRA, Hovenweep, Alkali Ridge, White Canyon Complex, Moki-Red Canyon Complex, and Dark Canyon/Middle Point as Areas of Critical Environmental Concern on the basis of the outstanding natural, scenic, and cultural values of those areas. In addition, I ask the BLM to name White Canyon, Dark Canyon/Middle Point, Cedar Mesa, and Canyonlands Basin areas as Outstanding Natural Areas.

I have enjoyed many weeks of recreation in the San Juan "Resource Area", and have some familiarity with each individual area under study, with the exception of Alkali Canyon. This land is absolutely unparalleled anywhere on the planet for scenic wonder. It constitutes a unique ecosystem, and is one of the archeologically and culturally richest regions in the hemisphere. Too much of this land has already suffered irreparable harm. Unless the BLM manages this priceless heritage in a manner which will protect it from abuse and exploitation, its values will continue to erode.

BLM should put its highest priority on the protection of this primitive red rock wilderness. Lands adjacent to National Park units should be managed to preserve park values. And BLM must acknowledge preservation of archeological, cultural, and historical resources as a critical planning and management priority.

To the best of its abilities and resources, BLM should prevent pot hunting, inventory and protect areas of cultural significance, limit ORV use to existing roads, prohibit chaining, limit grazing, reject projects which would violate Class I air and visual quality standards, and severely limit or prohibit oil and gas leasing in this region. The economic potential of these ACEC's is small, their intrinsic value, and their value to tourism and the recreation industry is great.

Thank you for the opportunity to comment on the SJRMP.

Sincerely,

Steve Erickson
961 E. 600 S.
Salt Lake City, UT 84102

RESPONSE TO COMMENT 60 STEVE ERICKSON

[Comment page 1]

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response to comment 2, National Parks and Conservation Association, for a discussion of all areas mentioned.

BLM has dropped the ONA designation in favor of the ACEC designation.

BLM agrees that SJRA contains appreciable natural resource values. Regarding protection of wilderness values, see the response to comment 13 from Utah Wilderness Association.

The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Regarding management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association.

BLM recognizes the need to protect cultural resources (see draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. For a discussion of points raised in this comment regarding cultural resource management, see the response to comment 50 from Kris Chick.

Change to the EIS? No.

COMMENT 61

October 29, 1986
P.O. Box 401
Glenwood Springs, CO 81601

Bureau of Land Management
San Juan Resource Area
P. O. Box 7
Monticello, UT 84535

Dear Sirs,

I'm writing you with input on the BLM San Juan Management Plan draft. I visit eastern Utah extensively, at least four times a year, for sightseeing, hiking and backpacking, camping and white water rafting. I have introduced the region to many friends from Colorado, other states and foreign countries. The preservation of southeast Utah's outstanding cultural, scenic, recreational and wilderness values are of paramount concern to me.

I urge the BLM, as federal managers of these lands, to prioritize the protection of these essential qualities in the San Juan Resource Area, particularly in areas identified as primitive, semi-primitive nonmotorized and semiprimitive motorized.

I further urge the BLM to manage the lands adjacent to the National Park units, including Canyonlands, Hovenweep, Natural Bridges, Glen Canyon National Recreation Area; and to establish a meaningful program to insure protection of the area's magnificent cultural (archaeological) resources from degradation and exploitation. According to your plan, archaeologists estimate the San Juan Resource Area may contain as many as 200,000 sites.

I believe the following areas should be designated as Areas of Critical Environmental Concern (and Outstanding Natural Areas where noted):

Canyonlands Basin - Protect the scenic values for all lands in the basin visible from Canyonlands National Park, the Needles and Canyonlands Ocerlooks, Hatch Point Cliffs. The preservation of scenic views are essential to the wilderness experience and enjoyment of visiting the park.

Also protect cultural values for all lands within the Canyonlands Basin, and for all lands between Hart's Draw and the park boundary. Important cultural resources include a variety of archaeological sites. All lands within the basin should also be designated as Oustanding Natural Areas.

Beef Basin - An ACEC designation is needed to protect scenic values for lands between Canyonlands National Park, Manti-La Sal National Forest and the Dark Canyon Plateau, all areas visible from the Park. This includes sections of Beef Basin, Dark Canyon Plateau and Cathedral Butte. The area also includes important

RESPONSE TO COMMENT 61 HARLAN FEDER

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding the comment on preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Regarding the comment on management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association. BLM recognizes the need to protect cultural resources (see draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's nominations of specific areas are accepted. See the response to comment 2, submitted by National Parks and Conservation Association, for a discussion of all areas mentioned.

BLM has dropped the ONA designation in favor of the ACEC designation.

wildlife habitats for desert bighorn sheep and deer. These lands require protection for their cultural values as archaeological district designation.

Natural Bridges - I know from personal experience the area surrounding the monument is every bit as beautiful and captivating as the monument itself. ACEC designation is necessary to protect scenic values for all areas visible from the monument, including Harmony Flat, Woodenshoe Butte, The Toe, Deer Canyon.

Hovenweep - I support a 2000-acre ACEC to protect scenic and culutral values in this area as proposed under alternative D.

Glen Canyon National Recreation Area - All lands in the San Juan Resource Area that lie within this recreation area should be be granted ACEC status to protect their myriad scenic, cultural, natural and wildlife values. Mining and grazing in this area would detract considerably from the area's special appeal.

Cedar Mesa - I have visited this area and hope to visit it again in its most primitive and undisturbed natural state. I urge you to designate this area ACEC to protect its scenic, cultural and natural values. The boundary should be consistent with proposed archaeological district under alternatives C & D (but not E).

This area includes Grand Gulch, Johns, Slickhorn, Fish and Owl, Lime, Road, Mule and Arch canyons and Comb Ridge. This area is rich in cultural resources, and is very vulnerable to pot-hunting. I also support an Outstanding Natural Areas designation for Cedar Mesa region.

Alkali Ridge - ACEC needed to protect cultural values within a boundary consistent with the 170,320-acre Alkali Ridge ACEC proposed under alternative D. Cultural sites are dense in this area, and it's vulnerable to energy exploration and development, vandalism and road construction.

White Canyon Complex - Another extraordinary region of southeast Utah that is vulnerable to exploitation. An ACEC is needed to protect scenic and cultural values for the area north of Utah 95 and south of Dark Canyon Plateau and Manti-La Sal National Forest, including Cheesebox, Gravel, Long, Footknocker canyons and distinctive landmarks like Jacob's Chair. I also support an ONA designation for the White Canyon Complex.

Moki-Red Canyon Complex - Cultural values within upper Lake Canyon, North Gulch and upper ends of Moki, Forgotten, Red and Cedar canyons deserve ACEC designation.

Dark Canyon and Middle Point - Scenic, cultural and natural values warrant ACEC and ONA designation of this region.

In addition, I urge the BLM to establish management prescriptions which provide meaningful protection for ACECs and ONAs and the values they were established to protect. The above regions which I have strongly recommended for ACEC and ONA status should be:

- closed to oil and gas leasing
- limited ORV use to exisiting roads, except in some cultural ACECs where road access promotes cultural site degradation
- withdrawn from mineral entry
- unavailable for livestock
- excluded from land treatments, range improvements and vegetative manipulation (unless it can be demonstrated that ACEC/ONA values won't be harmed)
- excluded from private and commercial use of woodland products
- managed as Visual Resource Management (VRM) Class I areas

I further urge the BLM to correct its failure to recognize cultural resource protection as a planning issue, and to ammend or supplement the draft RMP to identify special management actions BLM will take to protect cultural resources. These actions should include:

- identify and protect areas with potential cultural values until intensive inventories can be completed
- develop management categories on the basis of inventories and restrictive stipulations needed to protect cultural resources from energy exploration and development, ORV use, land treatments, etc.
- monitor trends for condition changes
- increase patrols and surveillance to prevent pot-hunting
- increase efforts to prosecute violators
- increase evaluation and nomination of districts and sites for national register nomination

In closing, I wish to note that development of a Cultural Resources Plan will help highlight to the U.S. Congress the need for additional funding for cultural resource management in the San Juan area.

Thank you for allowing me this opportunity to respond to the BLM's San Juan Resource Management Plan draft. My affection and concern for southeast Utah easily justify my time spent in familiarizing myself with these specific issues and writing you.

Yours truly,

Harlan Feder

RESPONSE TO COMMENT 61 HARLAN FEDER

[Comment page 3]

BLM has prepared management prescriptions for potential ACECs that would be needed to protect values identified as at risk (see draft appendixes A and I, as revised). See the response to comment 2, submitted by National Parks and Conservation Association, comment page 28, on this topic.

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see the revisions to draft page 1-6).

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The draft states that CRMPs would be developed for management of specific cultural resource properties or districts (draft page 2-6 and table 2-7). Congress is aware of BLM's projected funding needs; Congressional funding is based upon many factors (see response to comment 22, Environmental Protection Agency, comment page 8, on this topic).

Change to the EIS? Yes.

COMMENT 62

Bureau of Land Management
San Juan Resource Area
Box 7, Monticello, Utah 84535

Box 545
Snowmass, Colo. 81654
October 30, 1986

Dear Sirs:

Regarding the BLM's Draft Resource Management Plan/Environmental Impact Statement for the San Juan Resource Area, I would like to offer the following concerns. In the BLM's preferred alternative E, I feel that only a small part of these unique resources are being protected or even considered.

As a frequent visitor to this area, I have hiked and backpacked into many of these areas included in this resource plan and I am familiar with the amazing natural and cultural features which are in these places. I have studied the history of the Anazazi culture and the cultures which followed and I am shocked that the BLM apparently does not recognize cultrual resource protection as a planning issue. There are thousands of archeological sites that have never even been inventoried. This rich natural resource belongs to the entire country. Therefore I urge the BLM to amend the SJRMP to protect these cultural resources with whatever stringent actions necessary to prevent them from energy exploration, development, ORV use, etc.

The FLPMA gives priority to the designation of Areas of Critical Environmental Concern. This designation will help protect the special values of specific sites in the SJRA. The designation of "Outstanding Natural Areas" where recreational activity is necessary to preserve those characteristics, will protect the natural features of these special sites also. In many cases we need both classifications.

Beef Basin, Cedar Mesa, Grand Gulch, Mancos Mesa, the White Canyon Complex should have either or both of these designations along with lands adjacent to National Parks such as Canyonlands, Hovenweep, Natural Bridges, and Glen Canyon National Recreation Area.

For instance at Hovenweep, there should be a boundary to protect this historic Momment. The National Park Service has

RESPONSE TO COMMENT 62 DOROTHEA FOX

[Comment page 1]

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see the revisions to draft page 1-6).

BLM recognizes the need to protect cultural resources (see draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in the SJRA.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response to comment 2, National Parks and Conservation Association, for a discussion of these areas.

BLM has dropped the ONA designation in favor of the ACEC designation.

suggested that a 2000 acre area be added to the Park. This should be designated as an ACEC until that can be done.

In the Cedar Mesa area, including Grand Gulch, Johns, Slickhorn, Fish and Owl, Lime, Road Mule, Arch Canyons and Comb Ridge all contain outstanding natural, scenic and cultural values. I urge an ONA for all roadless lands in this Cedar Mesa ACEC.

In summary, I would urge you because of the archeological treasures in these lands and the increasing demand for more recreation throughout Utah and the country in general, that these above mentioned areas be protected from development and abuse.

Sincerely,

Dorothea Fox

Dorothea Fox

RESPONSE TO COMMENT 62 DOROTHEA FOX

[Comment page 2]

For potential ACECs, BLM has prepared management prescriptions that would be needed to protect values identified as at risk (see draft appendixes A and I, as revised).

Change to the EIS? No.

Oct. 31, 1986 COMMENT 63

JOHN FOX
BOX 545
SNOWMASS, CO 81654

Dear Sir,

The San Juan Resource Area encompasses some of the finest country on the Colorado Plateau, which is to say, some of the finest wild country anywhere. Cedar Mesa, the White Canyon Area, Dark Canyon, Grand Gulch, Bell Basin, and more are included here. These are BLM lands. How are they to be managed?

This area (SJRA) is rich in cultural resources. In other words, one can wander the canyons and mesas and come upon history at every turn — leavings of the daily lives of the ancient ones. It is there, in the silence of rock and sky — history.

In the 1980 Grand Gulch Plateau Management Plan BLM identified these cultural resources as both rare and nationally significant and a the major resource value of the SJRA. BLM also recognizes that current cultural resource management is inadequate. It is allowing an acceleration of disturbance and destruction of these resources, has failed to ensure enforcement of the Archeological Resources Protection Act, and is inconsistent with surrounding National Park Service cultural resource management. Why, then, in the RMP/EIS, does BLM choose, in its preferred alternative, to protect only a fraction of these resources?

I strongly urge BLM to use both special management designations (such as areas of critical environmental concern [ACEC]) and stringent management stipulations to insure adequate protection of cultural resources.

RESPONSE TO COMMENT 63 JOHN FOX

[Comment page 1]

This comment mentions the 1980 draft Grand Gulch Plateau Management Plan. Proposals made in that draft are superseded by this RMP/EIS (see the response to comment 9, Southern Utah Wilderness Alliance, on this topic). See also appendix AA to the final EIS.

BLM recognizes the need to protect cultural resources (draft page 2-6) and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The preferred alternative provides several special designations for cultural resources (see draft tables 2-2 and 2-6, both as revised). Special designations alone do not guarantee a particular level of management. (Stipulations for management of the proposed special designations are given in draft appendix A.)

There is increasing appreciation for the country within the SJRA. Appreciation for the country as it is — empty, wild, beautiful. This, of course, is a mixed blessing. The fact remains, though, that the demand for primitive and semi-primitive recreation is growing. BLM expects this demand to increase 20 to 30% by the year 2000. BLM also recognizes that over-crowding and heavy use are threatening the primitive values of these lands and could cause a significant decrease in these values. Primitive and semi-primitive non-motorized designations contain the least amount of acreage throughout the SJRA, yet are in the most demand. BLM has failed to identify any new areas for protection to insure that opportunities for primitive recreation will be available in the future.

I urge BLM to use both special management designations (such as ACEC and Special Recreation Management Areas [SRMA]) and stringent management stipulations to insure adequate protection of primitive recreation resources.

The high desert country of S.E. Utah is exceptional. There is simply no place like it in the world. Few have known it. That is changing. This wild and empty country is being discovered. There lies great promise and great danger. It will never be as it was — a vast wilderness of rock, unmanaged, unknown. Like it or not, we must now "manage" it. That is a delicate proposition, I grant. But we must not forget what is at stake, what can be lost. We must not trample and desecrate this land as we come to know it. We must care. We must protect.

Sincerely,
John Fox

RESPONSE TO COMMENT 63 JOHN FOX

[Comment page 2]

BLM recognizes the increasing demand for primitive recreation (draft page 3-66).

BLM used the ROS system to inventory and identify areas that now qualify as P and SPNM class areas (draft page 3-66, figure 3-16, table 3-10, and appendix F). The preferred alternative in the draft would impose special conditions on management of these areas to preserve their ROS class (except for areas near the Colorado state line); no attempt was made through the preferred alternative to create settings that do not now exist.

The proposed RMP provides for designation of additional SRMAs, and management prescriptions to provide for a variety of recreational experiences.

Change to the EIS? No.

COMMENT 64

Hyrum, UT
Oct. 31, 1986

To Ed Scherick:

Having spent some enjoyable time in the outdoors of southeastern Utah I would like to comment on the BLM's San Juan Resource Management Plan.

Please implement the use of designations such as Areas of Critical Environmental Concern and Special Recreation Management Areas to protect the areas archeological sites and primitive recreation areas (this in lieu of more appropriate means of protection). I would urge the implementation of Alternative D instead of Alternative E.

Thank you,

Jim Graham
277 South Center
Hyrum, UT 84319

RESPONSE TO COMMENT 64 — JIM GRAHAM

[Comment page 1]

The proposed RMP provides for designation of several areas as ACECs and SRMAs (see revisions to draft chapter 2 and appendix I).

BLM recognizes the need to protect cultural resources (draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Change to the EIS? No.

COMMENT 65

Douglas J. Green
1197-A Bear Mountain Dr
Boulder, CO 80303

November 1, 1986

Ed Scherick, SJRA Manager
Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

Dear Mr. Scherick,

I am writing to express my concern over the Resource Management Plan for the San Juan district. In reviewing the plan, I am disturbed by several things.

In the first place, I believe there is not enough protection afforded to the cultural resources of the area. In many places throughout the RMP, mention is made of the extent of these resources, their great national value, and the dangers which threaten them. For example, on page 3-60 the RMP states "Archaeologically, SJRA is one of the richest locales under BLM management. Of the approximately 17,000 recorded sites in San Juan County, it is estimated that over 10,000 are situated on public lands. Archaeologists estimate that the SJRA may hold as many as 200,000 sites." It also states "Many sites have been disturbed or destroyed through human activity over the past 100 years. It is now difficult to find undisturbed cultural resources." and "Exploration and development ... of minerals, grazing and related land treatments, and land disposal actions ... carry potential to interfere with protection of cultural resources."

And yet, in light of this great national resource, which is under threat, the BLM has chosen to protect through official designation only a fraction of the lands which deserve and require protection under the FLPMA regulations. As the RMP itself admits, "Use and management of cultural resources is specifically governed by law and regulation. The need for protection of these resources is established by law and is beyond the discretion of BLM field office personnel." (page I-6) And yet, you have chosen NOT to make this a "planning issue" in the RMP! This is wrong! I urge you most strongly to adopt Cultural ACEC designations for the areas I have outlined below.

In the second place, not enough attention has been paid to protecting the outstanding recreational opportunities found throughout the SJRA. In particular, the acreage devoted to Primitive and Semiprimitive Nonmotorized ROS classes is far too small. As the BLM has recognized, "The settings toward the primitive end of the spectrum tend to be the most crucial in the SJRA because they contain the least acreage and are most in demand, and because many management actions tend to change the setting away from the primitive end of the spectrum." (page 3-66).

Southern Utah, and San Juan County in particular, is recognized as containing the greatest concentration of wild places left in the United States

outside Alaska. Visitors from across the country, and indeed around the world, know this. The popularity of the county as a destination recreation area is growing rapidly, especially among backcountry users, and the BLM needs to recognize that people want to see these wild places preserved. The pressures brought by the public for this type of recreation are only going to increase. You have both the power and the opportunity here, today, to meet this growing demand, and to act wisely to provide for the primitive recreation needs of the public well into the next century. I urge you most strongly to increase the acreages devoted to both P and SPNM ROS classes, and to adopt ACEC and ONA designations for the areas I have outlined below.

ALKALI RIDGE

I support ACEC designation to protect CULTURAL RESOURCES in this area, which reachs perhaps the highest density of any in the SJRA. Alternative D proposed 170,320 acres, but this was reduced to only 35,890 under Alternative E. I urge you most strongly to adopt the full 170,320 acres.

BEEF BASIN

I support an ACEC for SCENIC VALUES for the lands between Canyonlands NP, the Manti-La Sal National Forest, and the Dark Canyon Plateau, which are visible from the park. This includes portions of Beef Basin itself, Dark Canyon Plateau itself, and Cathedral Butte. Protecting this visual resource is critical to the integrity of the Park, and to the visitor's experience of the Park.

I support an ACEC for CULTURAL RESOURCES throughout this same area. Beef Basin and Fable Valley were proposed for Archaeological District designation in Alternative C, but not under the Preferred Alternative. Why not?

I support an ACEC to protect WILDLIFE HABITAT for the Desert Bighorn Sheep in this area. These critical habitats should be permanently removed from all forms of land treatments and development.

CANYONLANDS BASIN

I support an ACEC for SCENIC VALUES for all the lands visible from the BLM's Canyonlands and Needles Overlooks, as well as from Canyonlands National Park itself. This includes the Hatch Point Cliffs. As stated above, this visual resource is critical to the visitor's experience of the park as a whole. Lockhart Basin in the northern part of Canyonlands Basin was recommended under Alternative C, but dropped from the Preferred Alternative. Why?

I support an ACEC for CULTURAL VALUES within Canyonlands Basin, including the lands between Harts Draw and the Park. The southern half of this area was recommended under both Alternatives C and D, but not under the Preferred Alternative E. Why was it dropped?

I support an ONA designation for all lands within Canyonlands Basin.

RESPONSE TO COMMENT 65 DOUGLAS J. GREEN

[Comment page 2]

The ROS classes reflect the areas now meeting P and SPNM criteria. This does not imply that backcountry uses cannot take place in other ROS class areas. An ACEC would not be designated solely to protect recreational opportunities, although the designation can be used to protect scenic or natural values leading to recreational uses. BLM has dropped the ONA designation in favor of the ACEC designation.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are accepted. See the response to comment 2, National Parks and Conservation Association, for a discussion of all areas mentioned.

CEDAR MESA

I support ACEC designations to protect both CULTURAL and RECREATIONAL VALUES throughout Cedar Mesa, and especially for Johns, Fish, Owl, Lime, Road, and Mule Canyons, as well as Arch Canyon and Comb Ridge. This area is LOADED with Basketmaker and Pueblo sites, and was recommended under Alternatives C and D, but dropped from Alternative E. These areas need protection!

In addition, I support ONA designation for the entire area.

HOVENWEEP AREA

I support an ACEC to protect both CULTURAL and VISUAL RESOURCES in this area. In the 1985 Environmental Assessment for the Hovenweep Management Plan, the National Park Service recommended adding 2000 acres to the monument to protect cultural resources. This is integral to the Monument's purpose. This action was recommended in your Alternative D, but not under Alternative E. Why not?

MIDDLE POINT

I support ACEC designation for SCENIC, NATURAL, and CULTURAL VALUES here. I just don't understand why this pristine area was not included in the Dark Canyon ACEC under Alternative E. It deserves protection!

MOKI - RED CANYON COMPLEX

I support ACEC designation to protect SCENIC, NATURAL, and CULTURAL RESOURCES throughout this area, including the upper ends of Red, Cedar, Forgotten, Knowles, and Moki Canyons, North Gulch, and upper Lake Canyon. These areas are especially important because their lower ends are now under Lake Powell. The remaining cultural resources need protection to aid in understanding the cultural data from the pre-inundation studies. I have personally witnessesed the endangerment of cultural resources in Moki Canyon, just last January. Two men on a motorcycle, one carrying a shovel, accessed the canyon down the big sand slide north of Clay Hills Divide. I saw them in the vicinity of known ruins in the canyon. When they saw me coming they packed up and left in a hurry. I notified a BLM ranger of the incident the following day.

I support ONA designation for the area north of U-263, west of U-95, and east of Glen Canyon NRA. This includes Mancos Mesa, and the upper ends of Moki, Knowles, and Cedar Canyons and North Gulch, as well as Red and Blue canyons and their tributaries.

NATURAL BRIDGES NATIONAL MONUMENT AREA

I support an ACEC to protect VISUAL RESOURCES in this area, including Harmony Flat, Woodenshoe Buttes, The Toe, and Deer Canyon. Part of the enjoyment of the Monument is the sweeping vista seen from the entrance road off Highway 95, which includes these features. The visual integrity of this area should be protected, and the U-95 Scenic Corridor does not provide enough.

WHITE CANYON COMPLEX

I support an ACEC to protect SCENIC and CULTURAL VALUES for the lands north of U-95, and south of the Dark Canyon Plateau and the Manti-La Sal National Forest. This includes Cheesebox, Gravel, Long, and Fortknocker Canyons, and Jacob's Chair. In addition, I urge the BLM to close this area to any possible tar sands development, which would inevitably destroy the incredible beauty of White Canyon and its tributaries.

Some of my above comments illustrate the most disturbing aspect of the SJRMP. It is evident that designation of areas as ACECs, ONAs, etc, in Alternative E was done in an arbitrary and capricious manner. How can an area such as Beef Basin or Fable Valley be cited as an ACEC in one Alternative, but then NOT be included in the Preferred Alternative? If an area qualifies as an ACEC, ONA, or other designation, it qualifies. Period. Either the cultural resources are there, or they are not. Either the visual and recreational resources exist, or they do not. To state in one Alternative that an area deserves protection, and then to reverse that decision in another Alternative, indicates that the choice of preferred designation was done arbitrarily, without reference to the resources of the location itself. If the resources exist in reality, then in practice the RMP should reflect this simple and obvious fact. I urge the BLM to recognize this, and to use the resources themselves as the ultimate criteria for area designation. This is a serious problem, and would seem to be grounds for challenging the validity of the entire document.

When designating ACECs, ONAs, and SRMAs, I would like to see the BLM adopt stringent management prescriptions for those areas. The following guidelines would provide real, meaningful protection:

- Close the area to oil and gas leasing, or at least open it to leasing with special provisions to prevent surface occupancy. This is especially critical for "scenic" ACECs and ONAs.
- Limit ORV use to existing roads in all areas.
- Close sensitive areas where vandalism and pot-hunting is a problem.
- Withdraw the area from mineral entry, or at a minimum require a Plan of Operations which ensures no harm to cultural resources.
- Allow livestock use ONLY if such use will NOT harm the values for which the ACEC or ONA was established.
- Prohibit "land treatments" such as chaining, range improvements, and vegetative manipulation unless ACEC/ONA values won't be harmed.
- Prohibit private and commercial use of woodland products.
- Manage the area as a Visual Resource Management (VRM) Class I area, so that only projects that meet Class I objectives are allowed. This is especially important for scenic ACECs and ONAs.

RESPONSE TO COMMENT 65 DOUGLAS J. GREEN

[Comment page 4]

Under BLM guidelines for identifying and designating ACECs (manual section 1617.8), areas that may qualify for ACEC designation go through a screening process; the RMP/EIS has been used to provide this level of analysis (draft appendix H). Special designations may vary under alternatives developed to meet different management objectives. It is not true, as stated in this comment, that once an area is identified as having preliminary potential, it must be carried through ACEC designation. This is neither arbitrary nor capricious; instead, the alternative consideration of an area for special management reflects BLM's concern with finding the proper balance of multiple uses on public lands.

This comment's suggestions regarding management prescriptions for ACECs have been reviewed. See the response to comment 2, National Parks and Conservation Association, comment page 28, on this topic.

I urge the BLM to adequately address cultural resource protection in the final RMP. I believe the following special management actions should be taken:

- Identify and protect areas with potential cultural values until intensive inventories and evaluations can be completed.

- Develop management categories and restrictive stipulations as necessary to protect cultural resources from energy exploration and development, ORV use, land treatments, pot-hunting, etc.

- Monitor the areas for trend and condition changes.

- Increase patrols and surveillance to prevent pot-hunting, illegal grazing, illegal ORV use, etc.

- Increase evaluation and nomination of districts and sites for inclusion in the National Register.

I realize that implementing these guidelines requires money. I know your office is under-funded and under-staffed. I also know your fiscal resources are allocated by Congress, and I believe that development of a "Cultural and Recreational Resource Plan" highlighting the national significance of these resources could do much to influence Congress in the direction of additional funding for the San Juan Resource Area. You have a very broad base of support for such a proposal; your constituency extends far beyond San Juan County, it is indeed nationwide.

In closing, the RMP states on page 3-58 that cultural resources "are a nonrenewable resource ... they cannot be replaced." I would like to expand this to include the other nonrenewable resources of the San Juan District. Our nation's storehouse of outstanding natural areas, special recreation areas, primitive and wild and scenic areas are shrinking away even while at the same time demand for them is growing as never before. In the face of expanding urban sprawl and its attendant stresses, we as a people need these places as a refuge and a sanctuary where we can restore the balance within ourselves. As such, our children will need them even more. You, Mr. Scherick, and your associates in the San Juan District, have the opportunity, the privilege, and the responsibility to act today for the sake of our collective future. The greatest resources in the San Juan are its pristine ones. Please help to save them.

Thank you for this opportunity.

Sincerely,

Douglas J. Green

RESPONSE TO COMMENT 65 — DOUGLAS J. GREEN

[Comment page 5]

Regarding cultural resource protection, see the response to comment 50 from Kris Chick.

The draft identified areas where specific CRMPs would be developed (draft page 2-6 and table 2-7); these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29). Congress appears to be aware of the situation regarding cultural resource management.

BLM agrees that SJRA contains appreciable natural resource values.

Change to the EIS? Yes.

COMMENT 66

Route #1
Camp Douglas, WI 54618
4 September 1986

Ed Scherick
San Juan Resource Area Manager, BLM
Box 7
Monticello, UT 84535

Ed Scherick, Area Manager:

Please include this as part of the comment on the San Juan Draft RMP. I requested a copy of the RMP on July 3 but still have not received one. I see from the Federal Register notice that the comment period closes tomorrow. Did you receive my request?

My comments based on the Federal Register notice follow:

1) The preferred alternative calls for continuation of existing grazing levels. I urge BLM to be willing to adjust those levels as monitoring reveals needed changes. The range should be managed to maintain a near natural vegetative cover (no chaining, no heavy grazing) to protect watersheds, wildlife habitat, and recreation values.

2) There should be strong stipulations for reclamation of mineral exploration impacts.

3) Alternative D should be adopted for ACEC, ONA, and RNA designations. The preferred alternative includes designations for Bridger Jack Mesa, Lavender Mesa, Alkali Ridge, North Abajo, Grand Gulch, Dark Canyon, and Cajon Pond. The designations should be expanded on Alkali Ridge, North Abajo, Grand Gulch, and Dark Canyon and should include Hovenweep, Slickhorn Canyon, John's Canyon, Fish and Owl Canyons, Road Canyon, Lime Canyon, Mule Canyon, Arch Canyon, and Lockhart Basin. All of these areas have nationally significant archeological and scenic resources that deserve ACEC/NA designations as much as any BLM land in the West.

Please still send a copy of the RMP. Thank you.

Rodney Greeno

RESPONSE TO COMMENT 66 RODNEY GREENO

[Comment page 1]

Although the Federal Register notice of June 6, 1986 and the draft indicated that in general grazing would continue at current use levels (draft page S-4), BLM will use range monitoring studies to determine whether changes need to be made in grazing levels to protect the range resource (see draft pages I-7, 1-2, 2-5 through 2-6, 2-19, and A-30). Management prescriptions for range developed in the draft take many factors into account, and maintaining a near-natural vegetation cover was not determined to be the best management practice in all cases.

Change to the EIS? No.

COMMENT 67

Route 1
Camp Douglas, WI 54618
October 23, 1986

Ed Scherick, San Juan Resource Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, UT 84535
Attn: RMP

Ed Scherick, San Juan Resource Area Manager:

Please append this letter to my comment letter of early September on the San Juan RMP. Thank you for sending the second copy. The RMP reflects an impressive level of professional competence. It is well-presented and a respectable resolution of the inherent technical difficulties in any planning effort. I think BLM should take an even more aggressive approach to protecting the resources of the San Juan RA, though.

BLM has recognized the enormous natural and cultural values of the 1.8 million acre San Juan RA with proposals for two RNAs (5,930 acres), five ACECs (148,870 acres), seven National Register nominations (357,290 acres), closure of 251,980 acres to surface occupancy for oil/gas leasing (and special stipulations for 930,900 acres), segregation of 116,940 acres from mineral entry, closure of 100,400 additional acres to grazing (for a total of 138,120 acres closed), designation of three new special recreation management areas, substantial new ORV restrictions, and lessened fire suppression (Figure S-4 and Table 2-7). These proposals are a credit to BLM. The aesthetic, recreational, natural, and cultural resources of the San Juan deserve such recognition. I urge BLM, however, to extend ACEC or ONA designations to all WSAs as well as Arch Canyon, Harts Draw, Hovenweep, Lockhart Basin, Wingate Mesa, White Canyon, Beef Basin, Castle Creek, Mikes Canyon, and Nokai Dome. Segregation from mineral entry and closure to oil/gas occupancy should be made on these areas, too.

LIVESTOCK AND VEGETATION MANAGEMENT
Current condition--Over 90 percent of the resource area is in the "Improve" category (Table AO-1 and page I-21). The Improve category includes lands where "present range condition is unsatisfactory," "resource production potential is moderate to high and present production is at low to moderate levels," "serious resource use conflicts exist," and "present management appears unsatisfactory" (page A-47). This is a bleak picture of range conditions on 1,868,035 acres, but BLM's only recommended changes in management are 6,300 acres of new land treatments

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 1]

BLM appreciates this support of the level of professional competence reflected in the draft.

BLM has dropped the ONA designation in favor of the ACEC designation. While this comment does not provide information sufficient to support a nomination of the areas mentioned for consideration as ACECs, most have been considered in the proposed RMP and final EIS based on information supplied in other comments (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H, and I).

BLM evaluated all areas mentioned. Arch Canyon was evaluated as part of the Cedar Mesa potential ACEC under alternatives D and E in the proposed RMP and final EIS. Castle Creek and Mikes Canyon were evaluated as part of the Nokai Dome potential ACEC under proposed RMP and final EIS alternative D. Hart's Draw and Wingate Mesa were not found to meet the criteria of relevance or importance (BLM manual section 1617.8) and were not considered for ACEC designation; however, Wingate Mesa does border the White Canyon potential ACEC assessed in the proposed RMP and final EIS under alternative D.

BLM has prepared management prescriptions for potential ACECs that would be needed to protect values identified as being at risk (see draft appendixes B and I, as revised). IBLA (76 IBLA 395 (1983)) has directed that the level of management imposed on an area should be the minimum level needed.

Livestock and Vegetation Management

Current condition. As noted in this comment, 95 percent of the allotted acreage in SJRA is in an I category; however, this does not mean that each I category allotment meets all criteria for I classification, or that all acreage within the allotment meets I criteria (draft page A-47). Several I category allotments fell under this rating because they have the potential to produce more forage than they are producing at present.

Even if a criterion is met, the situation may not be "bleak," as suggested in this comment. For example, range condition may be unsatisfactory, but this does not necessarily mean that the condition is the worst it could possibly be. Unsatisfactory range condition may be poor, fair, or good, but not excellent (the best it could be). BLM does not consider the rangelands in SJRA to be in a widespread state of degradation.

Comments of Rodney Greeno, SJRMP
Page 2
Livestock and Vegetation Management Continued

(page 4-68), maintenance of existing treatments (page 2-68), ← And elim. of spring grazing on only 4 allotments
and slight stocking adjustments after the five-year monitoring period (page A-191). These actions seem inadequate in the face of such widespread range degradation.

Does an allotment have to be classed "Improve" in order to get range development money?

Future condition--BLM predicts future ecological condition of allotments by alternative in Appendix T. The assumptions for these predictions are given on page A-155. Are there any studies to support these assumptions? Land treatments are assumed to improve ecological conditions to climax. Crested wheatgrass is a strange definition of climax on the Colorado Plateau. Smaller allotments are assumed static. Why? AMP's are assumed to give a ten percent increase in ecological condition. Is this an average established by past experience? It seems obvious BLM does not have a good idea of what future conditions will be because it does not know how conditions were naturally, how climate has changed, how climate will change, what the current trends are, or how vegetation will respond to changes. I hope your range staff has collected more historical data than are reflected in the RMP (I'm sure they have). FLPMA requires sustained yield management, but BLM does not have the data needed to know what sustained yield would be except to maintain current levels of stocking and hope they can last. The level of sustained yield grazing intended by FLPMA seems totally ambiguous--maximum sustained yield? Sustained current yield? The problem is even more difficult when the sustained yield of grazing has to be placed in the mixture of sustained yield of other resources.

BLM recognizes the limitations of its current range knowledge and plans to do monitoring studies over the next five years saying "the condition of the range in the SJRA cannot be determined prior to evaluating the monitoring studies" (page 3-54). But after the monitoring studies BLM is going to be faced with the same problems in deciding what "sustained yield" means. Studies of the RNAs on Bridger Jack Mesa and Lavender Mesa RNAs and other areas may help in determining the potential natural sustained yield of much of the RA, but BLM will still have to decide what the proper level of grazing is in the context of all other resource outputs. The only range condition that is clearly unacceptable is a declining condition (under the Taylor Grazing Act). BLM seems confident it will not find such conditions in its range studies (page A-191), and the predictions under Alternative A (Current Management) in Table AT-1 reflect that confidence (only a few allotments are predicted to decline--somewhat disturbingly--under Alternative

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 2]

Changes in grazing management recommended in alternative E include not only those suggestions listed in this comment, but also development of AMPs (draft appendix U). AMPs would include grazing systems designed to improve present range condition and eliminate or reduce any resource conflicts.

One use of the category system is to prioritize the distribution of range development funds. These funds would generally be allocated to I category allotments before allotments in other categories.

Future Condition. Future ecological condition cannot be predicted accurately, but estimates can be made. The assumptions made in estimating changes in ecological condition are not based on specific studies, but are considered to be conservative estimates (draft appendix T). In response to this comment, the text of the draft has been changed to rate seedings as to livestock condition instead of ecological condition as indicated in the draft (see revisions to draft appendix T).

Ecological condition ratings are based on the relationship between the present vegetative aspect and the potential plant community for a particular range site, using a procedure developed by SCS. The potential natural community is determined by studying range sites that have been subjected to minimal abnormal disturbance. It was assumed that ecological condition would remain static in most smaller allotments because no changes were proposed or anticipated under current management.

Sustained yield as defined in FLPMA is maintenance of a high level of renewable resource production consistent with multiple use. This appears to mean that sustained yield is not full potential production, but something less given the conflicting demands of multiple uses. Allocation of resources to these conflicting demands will not be a simple decision, but will be based on the new RMP.

Based on this comment, the text of the draft has been changed to indicate that the trend (rather than condition) of the range cannot be determined prior to evaluating range studies (see revsions to draft page 3-54).

Monitoring will have to be the basis for any adjustments in grazing use. Since these data were not availble at the time the draft was prepared, predictions on change in grazing use were conservative. If monitoring studies show a need for change, grazing use will be adjusted (draft pages 2-6 and 3-54 and appendixes B and J).

Comments of Rodney Greeno, SJRMP
Page 3
Livestock and Vegetation Management Continued

A and none under Alternative E (Proposed Action) with elimination of spring grazing on four allotments and land treatments). The questionable assumptions of Table AT-1 still need to be recognized, though, and if monitoring over the next five years does find declining range conditions, there should be immediate action to end those conditions--not only judging from entire allotments in an overall way but over parts of allotments (especially riparian areas).

What changes in budgeting will make the monitoring studies possible in the next five years? Why were they not made over the twelve years since the federal court decision? The $14,000 extra for grazing management required under Alternative E (Table AK-5, page A-96) does not seem to be the key--especially since BLM's grazing budget in uninflated dollars was much higher in the 1970s than in the 1980s (maybe in inflated dollars, too).

Vegetation treatments--The "potential land treatments" under Alternative E total 241,960 acres (page 2-47) and 6,300 acres are proposed for treatment (page 4-68). There seems to be an error on page 2-68 which says "implement new land treatments on 241,960 acres." Should not "implement" be changed to potential or "241,960" to 6,300? Exactly Where are the 6,300 acres of proposed treatments? BLM proposes to maintain 57,000 acres of existing treatments under Alternative E (page 2-68). Nearly half of the proposed treatments are on the Grand Gulch Plateau (Slickhorn, Texas-Muley, and Comb Wash allotments) within a proposed National Register Archeologic District (Appendix U, page 3-55, and page 2-39). BLM is placing some big challenges before itself. Complying with the archeological resources protection statutes and regulations is going to make these treatments difficult to implement to say the least and they seem to go against the intent of the Special Recreation Management Area.

Economic considerations--The cost for annual grazing management and range improvement under Alternative E is $295,100; under Alternative A, $216,500 (page A-96). Total receipts from AUMs per year are about $76,950 (57,000 times $1.35 per AUM--a generous estimate). Receipts do not even cover the cost of range improvements under the proposed alternative. Even ignoring the costs in decreased water quality to Lower Colorado water users, and losses to recreation and wildlife from grazing, the 58 permittees of the SJRA (page 3-53) are getting a hefty subsidy. Of course, recreationists do not pay their way either, but they number in the tens of thousands (page 3-72) and they pay a lot more in taxes to the federal government. I do believe in agricultural subsidies (things were not so great before them either), but in an area such as the San Juan RA, the benefits to society as a whole through grazing are minute compared to the costs and the other benefits of the RA. Grazing

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 3]

Using monitoring as the basis for making grazing-use adjustments has been BLM policy only since 1982 (final grazing managment policy). Prior to that time, range inventories were used as the basis. Monitoring data have been collected during the period since the NRDC decision cited in this comment (draft page I-1), but not at the intensity needed to make grazing adjustments. Since the early 1980s, the monitoring program has been intensified to ensure that sufficient data will be available at the end of the 5-year monitoring period.

Rangeland monitoring is now taking place under current management. Monitoring costs are included in each alternative budget (draft table 2-4 and appendix K, as revised). Rangeland monitoring is considered to be high-priority work; the RMP/EIS assumes that funding will be available (draft page 1-2).

Vegetation treatments

Based on this and other comments, the text in table 2-7 has been changed to reflect that the acreage shown for land treatments is the acreage with potential for this type of use.

The draft shows areas that are physically suitable for land treatments, not proposed projects. The 6,300 acres is an estimate of the potential land treatment acreage that would be completed by the year 2000, assuming that 5 percent of the potential acreage would be treated (draft page 4-62 and table AW-5). (In the proposed RMP and final EIS, this figure has been changed to 6,090 acres.) No attempt has been made to predict where, within the potentially suitable acreage, the treatments would actually occur, or the methods that would be used to accomplish treatment. The projected treatments could occur within any of the allotments that have potential for this type of use.

Land treatments would be possible over much of Cedar Mesa. (Management prescriptions for most of Cedar Mesa have changed due to the proposed Cedar Mesa ACEC; see revsions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.) The NEPA document prepared for a specific land treatment project (draft pages 2-1, A-1 and A-29) would identify mitigation for adverse impacts to other resource values, such as cultural resources. Potential mitigation measures might include using herbicides or fire to accomplish land treatments or leaving buffers (islands) around cultural sites if mechanical means were used. On Cedar Mesa, it was assumed that up to approximately half of the potential acreage could be treated if mitigation was applied for cultural resources.

Economic considerations. Budget figures shown in the draft have been revised (see the response to comment 9, Southern Utah Wilderness Alliance, comment page 4, for a complete discussion).

Comments of Rodney Greeno, SJRMP
Page 4
Livestock and Vegetation Managment Continued

should not be allowed to threaten those other values. The fact that it does is a testimony to the strength of pork barrel congressional politics in BLM management. The ranchers might argue we should turn the land over to them to end the subsidy, but that would be the ultimate subsidy.

Other comments--BLM says that Alternative D would decrease forage to 25 livestock operators by 125 percent: Isn't this impossible?

Consideration should be given to closing more areas to grazing. The recommendations to close or continue closures on Grand Gulch, Wingate Mesa, Dark Canyon, Bridger Jack Mesa, Lavender Mesa, upper Indian Creek, and Pearson Canyon are excellent, but other areas are as critical. There are 2,134 acres of riparian areas closed under Alternative D and this should be a priority. The destruction of riparian vegetation is sickening in lower Indian Creek, Harts Draw, Arch Canyon, and doubtlessly in other areas.

Spring grazing would be eliminated on four allotments under Alternative E (page 4-68), but there are 23 allotments with spring grazing and without AMPs. Spring grazing threatens vegetation during the critical growing season (page 3-59). The changes on the four allotments "would allow an increase in vigor and density of cool season grasses" but what about the 19 other allotments? And what about the allotments with AMPs that still have spring grazing? Spring grazing occurs in the vast majority of the RA. What does this imply about the base properties BLM allowed under the Taylor Grazing Act adjudications? Can't they even support their cattle during the spring growing season? After one or two years without spring grazing the range should show "increased vigor and density" and support more cattle in the other seasons, but the ranchers in the SJRA apparently cannot fall back on their base property for those one or two springs. Should spring grazing have been eliminated by adjudication? Spring grazing is harming the vegetation of the SJRA, holding forage production at low levels, and increasing damage to other resources (wildlife, water, soils, recreation).

BLM notes on page 3-54 that the Perkins Brothers and Indian Creek allotments (343,610 acres--19 percent of the RA) "were proposed for reductions [in the 1960s adjudications], but these were never made." Why not? Why aren't they proposed in BLM's Proposed Action? Did the AMPs solve the problem with promises of range improvements or rest-rotation? How effective is rest-rotation? (I cannot find a discussion of it in the RMP which is not a good sign.) BLM notes that seven of the nine AMPs in the RA are "no longer followed to the letter because of changes in land status and operators, limited project funding, moratoriums against vegetative treatments,

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 4]

Other comments. The statement that forage would be reduced by 125 percent was in error and has been changed (see revisions to draft chapter 4, alternative D).

The RMP would close areas to grazing where needed to protect other resource values throughout SJRA; grazing exclusions on smaller areas could be done through activity plans. If necessary to preserve riparian values, specific parcels of riparian habitat may be closed to grazing as part of the management developed in AMPs after completion of the RMP. However, it is anticipated that most riparian areas can be managed for improvement while allowing some grazing.

This comment states that there are 23 grazing allotments in SJRA with spring grazing but without AMPs. Under alternative E, six allotments would have some spring grazing but no AMP. Season of use on these allotments was not changed because it was not considered to be a problem: either the allotments are very small with a small percentage of public land, or the grazing season includes only a part of the spring season (either early or late spring). The remaining 17 of the 23 allotments identified in this comment are classed as summer allotments. Most of the grazing is during the summer, although some spring or fall grazing is included (draft appendix O). This is not considered a problem. Spring grazing in those allotments proposed for AMPs would be rotated among pastures within the allotment, so that pastures would receive some rest, allowing an increase in density and vigor of cool season grasses.

Base properties (draft page 3-53) are used to qualify an applicant as a grazing permittee, and these properties must be capable of producing forage to sustain the permittee's livestock for a 2-month period (in this resource area). However, base properties are not required to be used for grazing.

Spring grazing was not eliminated by adjudication (draft page 3-54) because it does not deteriorate the range if periodic spring rest is provided. It is not known why reductions were not made in the 1960s as mentioned in this comment. The two allotments are not proposed for reductions in the preferred alternative because, under current policy, grazing adjustments based on range condition can be made only if supported by adequate monitoring data, which are not yet available. AMPs are not currently in effect for these two allotments, so the grazing solutions suggested have not been a factor (draft appendix P).

Rest-rotation grazing can be very effective in improving livestock forage. However, it is not the only grazing system that can be effective. Grazing systems are discussed in the draft on pages 2-6 and 3-57 and in appendix P; the specific type of system used would be assessed in the NEPA document prepared at the activity plan level (draft pages 2-1, A-1 and A-29).

Comments of Rodney Greeno, SJRMP
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Livestock and Vegetation Management Continued

and the fact that some plans have been found to be unworkable" (page 3-58).

BLM also notes that "The SJRA can produce forage sufficient to meet the demand for full active preference (79,098 AUMs)" (page 3-57). Then why is almost all of the RA in the Improve category at only 57,000 AUMs of use? BLM further states, "However, it is believed that implementation of grazing systems [at what net present benefit?] on allotments with the potential to respond to intensive management would produce more livestock forage (page 3-57). Does this mean BLM thinks the RA can produce even more than 79,098 AUMs? How affordable, desirable, or likely is that? It sounds fantastical to me. Barnyard RA.

Why have no new seedings been initiated since 1972 (page 3-58)?

The following statement on page 3-58 seems self-contradictory: "Season of use is also a concern in winter use pastures where shrubs are present. [They are present everywhere except new seedings?] Reducing the number of livestock in an allotment or in a pasture is not a viable alternative to achieve rest for plants. Desirable livestock forage plants are grazed first regardless of the number of livestock in a parcel of range. Total forage production is therefore reduced with a resultant loss in carrying capacity. [Isn't BLM supposed to prevent this not just react?] Reductions in active grazing preference would then be necessary. Specific allotments that require adjustments in grazing preference will be identified at the RPS or AMP level after completion of the RMP/EIS." [Would adjustments also be made in authorized use or just preference?] BLM says reduction is not viable in the first senctence but then says required adjustments will be identified. Isn't this contradictory? Or an exercise in recognizing the need for the politically impossible? Or BLM cannot reduce livestock until the damage is done?

RECREATION AND WSA MANAGEMENT

BLM recommends 342,950 acres in the San Juan RA for wilderness designation in the Statewide Wilderness EIS, but recommends only 116,940 acres for segregation from mineral entry, 0 acres for no O/G leasing, 251,980 acres for no surface occupancy O/G leasing, and 274,720 acres for closure to ORVs in the RMP. Lands are best left undeveloped in the Statewide EIS, but not in the RMP. Why not? Indian Creek, Mancos Mesa, Mule Canyon, and the other WSAs are the same land in the RMP as in the Statewide EIS. BLM has made some excellent protective recommendations in ACECs, RNAs, ROS Class P and SPNM mitigation requirements, ORV closures, and O/G leasing categories, but they leave the most important resources of the RA only partially protected.

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 5]

The I category means that range condition could be improved from its present state. Many allotments are in the I category because they have the potential to produce more forage. BLM's estimate that SJRA could produce more than 79,098 AUMs of livestock forage is based on potential if grazing management and land treatments are applied. Whether this would ever happen depends on many factors, including the decisions contained in the RMP and project economics.

New seedings have not been done since 1972 because of a moratorium placed by the Utah BLM at that time, and because of the NRDC lawsuit of 1975. Both restrictions prevent land treatments until land-use plans and activity plans are completed and site-specific NEPA documentation is prepared.

This comment questions season of use in winter pastures. The text has been clarified (see revisions to draft page 3-58). Reduction in livestock numbers alone is not sufficient to achieve rest for plants, since desirable plants will be grazed regardless of the number of livestock. A grazing system is necessary that allows plants to rest during critical growth periods. Otherwise, livestock reductions will be needed.

Except to resolve conflicts with other resource uses, BLM cannot adjust livestock use until adequate monitoring data have been collected (draft pages 2-6, 3-54, and appendixes B and J).

Recreation and WSA Management

The draft (page 1-2) discusses management of WSAs and ISAs if released from wilderness review by Congress. It is assumed that areas released by Congress from wilderness review would be managed for nonwilderness purposes. If an area is designated as wilderness, it would be managed under BLM wilderness management policy. BLM acknowledges that the recommendations, alternatives, and analysis used in the statewide wilderness EIS were not used in this RMP/EIS. However, BLM sees this as a logical division of analysis.

Comments of Rodney Greeno, SJRMP
Page 6
Recreation and WSA Management Continued

Locatable minerals--The areas closed to mineral entry under Alternative E are the existing Dark Canyon and Grand Gulch Primitive Areas (about 99,000 acres), Pearson Canyon (1,920 acres), part of the San Juan River Special Recreation Management Area (9,380 acres), and some small administrative, cultural, and recreational withdrawals (pages 3-23 and 4-63). Thus, the proposed action fails to segregate even the two proposed RNAs and the Slickhorn Canyon portion of the Grand Gulch ACEC. All of the WSAs should be segregated as well as Arch Canyon, Harts Draw, Lockhart Basin, Sweet Alice Hills, Mikes Canyon, Castle Creek, Nokai Dome, Lake Canyon, and the bighorn mesa tops (basically all ROS Class P and SPNM areas). Leaving these lands open to mineral entry is a waste of the remarkable and rare ecologic, aesthetic, and recreational values of the RA. BLM recognizes these unique resources (page 3-66), but fails to properly protect them. The mitigation requirements for ROS Class P and SPNM classes (page A-24 and A-25) are an attempt to protect these areas short of segregation from mineral entry, but they are not enough.

Oil/Gas Leasing--BLM recommends no surface occupancy for oil/gas leasing in ROS Class P areas, the existing primitive areas, and the San Juan River corridor (Figure S-4, page 2-62, and page 3-67). This is another excellent start but should be expanded to all WSAs and most of the north and west portions of the RA. These are not critical areas for oil/gas activity, but as BLM says "The [ROS] settings toward the primitive end of the spectrum tend to be the most crucial in the SJRA because they contain the least acreage and are most in demand, and because many management actions tend to change the setting away from the primitive end of the spectrum" (page 3-66).

ORVs--The ORV recommendations are the best part of the RMP. They go a long way toward recognizing the need for ORV restrictions in area that is currently 94 percent open with no restrictions. Alternative E would close 274,270 acres, limit 15,850 acres to designated roads and trails, limit 501,300 acres to existing roads and trails, impose only seasonal restrictions on 540,260 acres and leave 651,000 acres open. Arch Canyon, the RNAs, and ACECs should be closed to ORVs, too. How effective is BLM likely to be in enforcing the ORV restrictions?

ROS Classes and Mitigation Requirements--BLM's preferred alternative is "intended to maintain most P class areas" (page A-24). This is a great goal and BLM's proposed restricitons will help to fulfill the intention but complete segregation from mineral entry and other restrictions noted above are also needed. Restrictions for Class P and SPNM areas shown on pages A-24 and A-25 should note O/G categories and stipulations. The acreages for P and SPNM areas shown on pages A-24 and A-25 do not agree with the acreages on page 2-96. Which are correct? There should be a map of Alternative E ROS classes.

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 6]

Locatable minerals

Mineral segregations or withdrawals are made either to protect surface resources from development of mining claims or to prevent land from leaving the public domain under mineral patent. In either case, a segregation or withdrawal is made only where no less stringent management would resolve the conflicts. In the case of the two RNAs, the physical characteristics of the two mesas would permit mineral access from outside the RNA; these mesas have been mined in the past. Under alternative E as presented in the draft, all of the Grand Gulch proposed ACEC (including the Slickhorn Canyon area) would have been segregated from mineral entry, (draft page A-83). The proposed RMP recommends several additional areas for withdrawal (although not necessarily the areas mentioned in this comment). No management prescriptions are developed under any alternative in the RMP/EIS for WSAs based merely on the wilderness review status. The areas mentioned in this comment were considered for withdrawal under alternative D, but the resulting impact analysis did not indicate that an overall benefit to SJRA would result.

Oil and gas leasing. No management prescriptions are developed under any alternative in the RMP/EIS for WSAs based merely on the wilderness review status. BLM is obligated to apply the least restrictive level of stipulations to oil and gas leases necessary to resolve resource conflicts (76 IBLA 395 (1983)); the draft impact analysis (chapter 4) did not justify a higher level of restriction in the areas mentioned in this comment.

ORVs. BLM appreciates this support for the ORV designations proposed under the preferred alternative. Under the proposed RMP, Bridger Jack and Lavender Mesas would be closed to ORV use. Arch Canyon contains a county Class B road which BLM cannot close; ORV designations do not apply to county roads. All of the ACECs assessed have limitations on ORV use included as part of the management prescriptions (draft appendix I, as revised). ORV restrictions (draft appendixes B and E) will be implemented and enforced in accordance with BLM manual sections 8341 and 8342.

ROS Classes and Mitigation Requirements. BLM appreciates this support for management prescriptions to maintain ROS classes. Under the proposed RMP, many P class areas would be recommended for mineral withdrawal (see the proposed RMP map); in the other ROS class areas, this level of management is not believed necessary. The acreages in appendix A are those to which the special conditions listed would be applied; the acreages in table 2-10 are those that would be expected to be present in the year 2000 under the management prescriptions developed for each alternative. As noted in appendix A, the areas managed for ROS classes under alternative E are the areas shown in figure 3-16, with the exception of the P and SPNM class areas near the Colorado state line.

Comments of Rodney Greeno, SJRMP
Page 7
Recreation and WSA Management Continued

ACECs--FLPMA requires that priority be given to the designation of ACECs (page 1-9), but the San Juan RMP reflects BLM's extreme reluctance to use this management tool. Only two existing primitive areas as recreational ACECS (with small additions--111,170 acres), three cultural ACECs (37,660 acres plus a 49,130-acre overlap with a recreational ACEC), and one wildlife ACEC (40 acres) are recommended. The primitive areas deserve at least ACEC designations and probably should be ONAs. Grand Gulch Plateau was recommended as a 400,000-acre congressionally designated National Conservation Area in BLM's 1980 Draft Management Plan for the Plateau. That plan was deferred for the RMP. What happened to the NCA proposal? That plan also proposed ONA status for Grand Gulch, Slickhorn Canyon, Johns Canyon, Owl and Fish Creek Canyons, Road Canyon, Lime Canyon, and Mule Canyon; scenic area status for Arch Canyon and Valley of the Gods; and National Natural Landmark status for Comb Ridge. What happened to these recommendations? Many comments were submitted on these proposals in the Draft Plan and they have not been responded to. These areas should all be protected as ACECs or ONAs along with Mancos Mesa, the bighorn mesa tops, White Canyon, Mikes Canyon, Castle Creek, Nokai Dome, Lake Canyon, Beef Basin, Lockhart Basin, and Harts Draw.

SRMAs--There are three existing special recreation management areas: San Juan River (15,100 acres), Grand Gulch Plateau (385,000 acres), and Dark Canyon (62,040 acres) and three proposed SRMAs: Beef Basin (66,450 acres), Indian Creek (80,000 acres), and Pearson Canyon (1,920 acres). These recognize the most visited recreation lands in the RA and are a good part of the framework needed for controlling recreation impacts. I urge BLM to act aggressively in educating the public about minimizing their impact and imposing restricitons necessary to maintaining the cultural, ecologic, aesthetic, and recreational values of these areas.

Other comments--The Dark Canyon ISA is not contiguous with the Needles Proposed Wilderness in Canyonlands NP as stated on page I-4, but to the Maze Proposed Wilderness. The two proposed wilderness areas are separated by the Elephant Hill to Beef Basin jeep road.

WILDLIFE HABITAT MANAGEMENT
The mitigation requirements and O/G restrictions for wildlife are another good start, but should be complemented with segregations from entry, O/G closures, and ORV closures as discussed above. BLM says on page A-20 that under Alternative E "Grazing and other livestock uses will not be allowed" in 25 foot wide floodplain and riparian/aquatic corridors shown in Figures 3-9 and 3-12. Is this a mistake? It contradicts other statements about grazing closures.

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 7]

ACECs. BLM does not agree that the draft shows "an extreme reluctance" to use ACECs as a management tool: 17 areas are considered for special designations, 10 of these for ACEC (both the RNA and ONA designations are being phased out in favor of the ACEC designation). Draft alternative D would put 585,800 acres (33 percent of SJRA) under special designation, and draft alternative E 154,800 acres (9 percent); to the RMP team's knowledge, this acreage considered for special designation is as much as, or more than, under any other RMP prepared to date. The proposed RMP provides for designation of several additional areas as ACECs (see revisions to draft chapter 2 and appendix I): under the proposed RMP, 501,000 acres (28 percent of SJRA) would be under ACEC designation.

This comment asks about proposals made under the 1980 draft Grand Gulch Plateau Management Plan. BLM has included the analysis of public comments received on the draft Grand Gulch Management Plan (final EIS appendix AA). The consensus was that no activity plan should be prepared prior to completion of this RMP (MSA page 4333-15, draft page 3-77). Proposals made in that draft, including the proposals for a National Conservation Area and National Natural Landmark, are superseded by this RMP/EIS.

To qualify for consideration as a potential ACEC, an area must meet the two criteria of relevance and importance (BLM manual section 1617.8) (see also the response to comment 101, Owen Severance). In response to other comments received, the areas mentioned have all been considered for ACEC potential in the proposed RMP and final EIS, primarily under alternative D (see the response to comment 2, National Parks and Conservation Association).

SRMAs. BLM appreciates this support for the SRMAs shown in the draft. In the preferred alternative, three of the proposed SRMAs shown in the draft have been combined into the Canyon Basins SRMA. Also, in response to this comment, Hart's Draw has been added to the SRMA. This comment correctly notes that the Dark Canyon ISA adjoins the Maze proposed wilderness (see revisions to draft table 1-1).

Wildlife Habitat Management

No conflicts between surface use and wildlife use of crucial habitat areas were noted, except during critical periods; therefore, the seasonal restrictions were developed. As noted in this comment, the statement on page A-20 regarding livestock exclusions in riparian areas is in error and has been deleted (see revisions to draft appendix A).

Comments of Rodney Greeno, SJRMP
Page 8
Cultural Resource Management

CULTURAL RESOURCE MANAGEMENT
BLM notes on page 2-6 that management of cultural resources is largely set by law with the dominant objectives being avoidance and excavation if avoidance is not possible, but BLM does have much discretion in deciding how impossible avoidance is. BLM is proposing about 3,000 acres of vegetative treatments inside proposed National Register properties, but it is also proposing significant ORV restrictions which should help greatly in protecting cultural resources.

Many more areas than proposed in the preferred alternative are eligible for National Register nomination and cultural ACEC designation--and not all of them are shown in Figure 3-15, Cultural Resources. All that are shown should be nominated and I know of at least two other canyons that should be nominated. Why aren't all of the potential NR sites/districts shown? The pothunters know, why not everybody else?

A 2,000-acre ACEC adjacent to Hovenweep NM should be a first priority. The NPS recommended this area for addition to the NM in 1985 (page 2-10). These lands should be kept from O/G activity to protect some of the most outstanding cultural sites in the nation.

OTHER ISSUES
Figure S-4 should have a better legend explaining how the categories shown relate to O/G areas and ROS classes.

Over 6,000 acres are proposed as suitable for disposal under Alternative E including 25.0 acres at Fry Canyon Store and 40.0 acres at Photograph Gap. I oppose disposal of these tracts. It would be a threat to the natural integrity of the areas they are set in.

Thank you for considering my comments. With hope for BLM and its lands--

Rodney Greeno

RESPONSE TO COMMENT 67 RODNEY GREENO

[Comment page 8]

Cultural Resource Management

BLM recognizes that many more sites are eligible for listing on the National Register than those listed in the draft (draft table 2-2). It is not cost-effective for BLM to nominate individual cultural properties to the National Register. Anyone, including the commentor, can nominate cultural sites to the National Register. BLM manages sites that are potentially eligible for listing in the same way as it manages sites that are listed on the National Register (draft page 2-6); therefore, the outcome of RMP decisions would not be affected by listing more sites, regardless of whether the sites are nominated, listed, or not nominated.

The area adjacent to Hovenweep, mentioned in this comment, has been proposed for ACEC designation, in response to a request from NPS (see the revisions to draft chapter 5). The proposed area (that requested by NPS) contains 1,500 acres (slightly different from the 2,000 acres shown as a potential ACEC in draft alternative D) (see revisions to draft, table 2-6). The management prescriptions for the proposed ACEC are those worked out between BLM and NPS; they are the level necessary to protect surface resources present (see revisions to the draft summary, chapters 2, 3, and 4, and appendixes A, H and I.)

Other Issues

The legend on figure S-4 corresponds to the oil and gas categories.

The development at Fry Canyon, under a lease since 1955, has a store, motel, cafe, trailer court, and two residences. The area of development at Fry Canyon currently encumbers approximately 17.5 acres, even though the existing lease is for 2 acres. The 25 acres identified in the draft is the smallest parcel possible to cover the current facilities, using aliquot parts. The proposed 25-acre disposal would cause no greater impact to scenic resources than the existing facilities now in place.

The 40-acre tract at Photograph Gap is an isolated parcel; it is uneconomic for BLM to manage small, scattered tracts. However, prior to any disposal, a field examination of the tract would be conducted. Any adverse impacts to surface resources would be assessed through the NEPA document prepared at that time (draft pages 2-1, A-1 and A-29). The tracts listed in the draft are those that meet certain criteria; suitability of each parcel would be determined individually. It is not expected that every parcel listed will be sold, or that every parcel sold will be contained in this listing.

Change to the EIS? Yes.

COMMENT 68

October 29, 1986

Ed Scherick
San Juan Resource Area Manager
P.O. Box 7
Monticello, Utah 84535

Dear Mr. Scherick:

Please consider the following comments.

Chapter 2-Plan Alternatives:

It is imperative that we protect what makes San Juan County unique: a heavy concentration of prehistoric cultural sites and vast areas of land not yet heavily marked by modern man. Alternative E is therefore a dissapointing choice. The BLM has failed to seize the opportunity to protect much of the SJRA's character.

Alternative E effectively provides no more protection for cultural sites that the current policy of inactive management, despite a projection of almost 16,000 damaged sites. Vandalism to sites strongly correlates with road access-the greater the development, the greater the loss. Only by limiting development, access roads, and ORV use will the BLM live upt to the policy mandates of 16 USC 470-1(1986 Supp.).

Alternative E unfortunantly results in a huge loss for nonmotorized primitive areas as well. Backcountry area use in the SJRA has grown rapidly, while there has been no corresponding rise in need for development. Primitive lands, like archeological sites, once gone will be lost forever. Development can always occur later if a true need arises. BLM has recognized that crowding in Grand Gulch and Dark Canyon may soon require a permitting system. Areas such as Fish and Owl Creek canyons approach similar usage. It is therefore difficult to justify BLM's decision not to protect greater amounts of wilderness lands.

San Juan County is a unique area within our county. It has avoided development which has homogenized most of our country. Here it is still possible to wander an isolated canyon alone, to visit the dwellings of ancient cultures, to enjoy a respite from the hurried world that exists elsewhere. It is unfortunate that an alternative has been chosen which will not protect these resources so that future generations might have also enjoyed them. Alternative D would have been a preferable choice.

Chapter 3- Biotic Components:
Air

The Management Plan determines that SJRA air is clean because there are no major polluting sources within the region. This blatantly ignores

RESPONSE TO COMMENT 68 SCOTT GROENE

[Comment page 1]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

As a result of other public comments received, proposed management of Grand Gulch, Fish Creek, and Owl Creek Canyons has been revised under the proposed RMP (see revisions to draft chapter 2). Protection of wilderness lands was not discussed in the draft. See the response to comment 13, Utah Wilderness Association, comment page 3, on this topic.

Chapter 3-Air

The draft notes (page 3-27) that air quality within SJRA is affected by activities on adjacent lands. Facilities outside SJRA, such as the powerplants mentioned in this comment, may affect air quality within SJRA; however, all available data for SJRA and the surrounding area attest to good air quality (draft page 3-28). Facilities outside SJRA operating under permits are outside the area of public lands covered in this RMP, and therefore are not covered by planning decisions that may come from this RMP.

If outside sources contribute to regional haze and affect visibility (and data indicate that the powerplants mentioned in this comment do contribute to regional haze), they would come under the purview of state air quality regulations. These are administered by the state, not by BLM.

large power plant sources within the four corners area which visibly affect air quality within the SJRA.

The SJRA Plan fails to provide any protection for the air quality of the PSD Class I area with in the SJRA.

Social Conditions:

The blanket statement that area residents favor development of natural resources is overbroad. While the pre-November election San Juan County Commissioners have been strident supporters of development at any cost, they do not represent the values of many of the county's residents.

Conclusion:

I appreciate the enormous difficulty the BLM faces in managing the San Juan County area. And while I disagree with the decision to implement alternative E, I would like to thank you for choosing to protect Grand Gulch and Dark Canyon.

Thank you for your consideration of these coments.

Sincerely,

Scott Groene
P.O. Box 32
Bluff, Utah 84512

P.S. Would you please place me on the mailing list for a copy of the final planning document?

RESPONSE TO COMMENT 68 SCOTT GROENE

[Comment page 2]

SJRA contains no class I air quality areas (draft page 3-28). Protection for class I areas near or adjacent to SJRA is provided by compliance with class I air quality standards as explained in the draft (page 2-8).

Social Conditions

The statement that residents favor development of natural resources is based on majority of responses to development-related issues at development-related public meetings in SJRA, letters to the editor of the San Juan Record, responses by elected officials, and socioeconomic studies of the area [Centaur Associates, Inc., 1979]. This statement was intended to represent the majority of local residents, not all people residing in the area. It did not imply that residents favor development of natural resources at any cost.

Conclusion

BLM appreciates support for the protection of Grand Gulch and Dark Canyon.

Change to the EIS? No.

COMMENT 69

9-14-86

Dear BLM —

Please accept this comment on the draft San Juan Resource Area plan state. I've been out of the country and did not receive DEIS until now.

Once again, I am dismayed at the bias BLM has shown towards grazing and mining of the public lands. Of a bad list of alternatives I favor Alternative D. In general I support livestock grazing only at sustainable healthy ecosystem levels, very little OHV and mining, no chaining, and high levels of water quality, forage (but not for cows), and as little management as possible.

There are many inconsistencies I wish to see directly answered in the final EIS.

GRAZING — ① If, according to the DEIS, 95% of allotments are in poor condition, then how can you construct a plan around the concept "... as long as grazing use is maintained at existing levels..." ? (2-15) ② How do you plan in Alternative E to keep cows out of riparian zones? ③ How do you plan to protect watersheds and maintain grazing conditions which have severely impacted riparian zones everywhere? ④ Why favor cow people who, on a county wide basis provide 3x less income than recreation modes of income?

Costs: Under Alternatives C and D costs are

RESPONSE TO COMMENT 69 ED GRUMBINE

[Comment page 1]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Grazing

1. The draft indicates that 29 of the grazing allotments in SJRA, or 95 percent of the resource area, are in the I category (draft page 3-54); the draft also indicates that one criterion for placement in the I category would be unsatisfactory range condition (draft page A-47). However, the draft does not state that 95 percent of the allotments are in poor condition. Unsatisfactory range condition could be poor, fair, or good, but not excellent. There are four other criteria for placement in the I category; presence of any one of the criteria would result in I classification. See the response to comment 3, National Wildlife Federation, on this topic. The statement that grazing use would be maintained at existing levels (draft page 2-15) is not believed incompatible with the range management actions proposed (see draft appendix U).

2. In areas where grazing was excluded, livestock would be kept out by using fencing, topographic barriers, or a combination of both. This type of detail would be worked out at the activity planning stage, not in the RMP (see draft appendix B).

3. Although the draft states that downcutting is found in some riparian areas (draft page 3-33) and that most riparian areas have uses that conflict with habitat management (draft table 3-6, pages 3-50 and 3-51), it does not state that riparian zones have been severely impacted everywhere in SJRA. The draft indicates that changes in livestock use may be made as a result of monitoring range condition and trend (draft pages 2-5 and 2-6); grazing use in riparian areas or watersheds could be adjusted if needed after monitoring studies are done. Watersheds would be managed for improvement under grazing systems developed at the activity plan level. The draft proposed management stipulations that would protect riparian areas and watershed areas with sensitive soils or sensitive slopes from conflicting resource uses (see draft appendix A, pages A-20 and A-21).

4. The alternatives considered in the draft favored different uses of resources. The preferred alternative showed an insignificant economic benefit to recreation outfitters and a slight economic loss to ranchers (draft table 2-10).

very high yet only because of high costs associated with grazing, habitat management, and range improvement. Why are such costs high under what should be "less" manipulative alternatives?

The draft does not picture recreation income from the SJRA as being important compared to recreation dollars produced in San Juan County. Where is the bulk of such monies generated if not on federal lands? Certainly most people in the area are there because of visits to SJRA lands.

Wildlife: The BLM's interpretation of the literature concerning cattle vs. wild grazers is misleading at best. Of course cows do not occupy same places at the same time as wildlife, since bighorn etc. will not associate with cows. They have been driven off.

Chaining: I strongly oppose Alt. E proposal to "manipulate" 31,300 acres of native vegetation. I strongly opposed the planting of any nonnative (ie crested wheatgrass) species. That is whole destruction!

In short, out of a bad lot of alternatives, I favor Alternative D. I hope that one day the BLM will manage land, not for extractive, but ecological concerns.

I request a reply to my questions even if they do not get on the DEIS record.

Sincerely,

Ed Grumbine
20 Granite Creek
Santa Cruz CA 95065

RESPONSE TO COMMENT 69 ED GRUMBINE

[Comment page 2]

Costs

The budget figures have been reviewed and corrected (see response to comment 9, Southern Utah Wilderness Alliance). See revisions to draft page 2-54 and appendix K.

Nonpublic-land areas in San Juan County which receive significant recreation visitation include Canyonlands NP, Natural Bridges NM, Hovenweep NM, Glen Canyon NRA, Manti-LaSal NF, and Monument Valley Tribal Park on the Navajo Indian reservation. These areas are federal lands, but are not included in the public land base assessed in the draft (see draft page I-17). In addition, an estimated 50 percent of the visitors traveling through the area are en route to a destination outside SJRA (see draft appendix R, page A-140).

Wildlife

BLM does not agree that bighorn sheep have been driven off the public lands. The bighorn sheep population in SJRA is the largest in Utah (draft page 3-42). The study cited by BLM [King and Workman, 1983] indicate that bighorn sheep did not use areas within grazing allotments differently during the grazing season from the way they used them during the nongrazing season; the study did not conclude that desert bighorn sheep were intolerant of cattle. (See also response to comment 27, Fish and Wildlife Service.)

Chaining

As noted above, the public comment period was not intended to solicit votes for any alternative presented in the draft. This comment errs in stating the preferred alternative in the draft would manipulate 31,300 acres of native vegetation: of the 31,340 acres of vegetative manipulation in alternative E, 25,000 acres are existing crested wheatgrass seedings, not native vegetation (see draft appendix W, page A-190). The remaining area (less than 0.5 percent of the public land area in SJRA) would be native vegetation, although there may be stands of adventive species within these areas. (The figures in the final EIS have been changed to 31,090 acres total, with 6,090 acres of new land treatments. This change is a result of modifications to management of the bighorn sheep habitat.) (See revisions to draft pages 4-68, A-190, and A-193.) Crested wheatgrass and other adventive or exotic species are used in seedings because of their success in rapid establishment, palatibility as forage for livestock and wildlife, and relatively small cost compared to native species. In areas of deep soils where native trees and shrubs become dominant, little understory cover of shrubs or grasses occurs. This leaves large areas of bare soils which are subject to deep rilling and gullying in SJRA. Crested wheatgrass and several other exotic species have been found effective in retarding the effects of erosion.

Change to the EIS? No.

COMMENT 70

Mr. Ed Scherick, Manager
San Juan Resource Area
B.L.M., P.O. Box 7
Monticello, Ut. 84535

Dear Mr. Scherick

The first time I drove through the country you have management responsibility for was in 1959, I was seven years old, and my heart poured out to it.

Even now as a non-resident I have a strong emotional attachment to the Colorado Plateau.

After living and working in Mesa Verde National Park, I know how valuable and fragile archelogocial resources are.

During pack trips into Dark Canyon and Grand Gulch I have seen the potential for degradation of both cultural and primitive resources due to recreational pressure.

Please consider steps to protect and maintain the valuable public lands under your management. The spirit of place of the Colorado Plateau is so unique in my opinion it deserves review as to it's special management potential.

Thank You For Your Considerate Attention.

Sincerely
Michael E. Holweger
Michael E. Holweger

RESPONSE TO COMMENT 70 MICHAEL E. HOLWEGER

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from the Utah Wilderness Association.

The proposed RMP provides management to protect cultural resources and primitive and semiprimitive recreational values (see revisions to draft appendix A). The proposed RMP provides for special management for Dark Canyon and Grand Gulch.

Change to the EIS? No.

Erik R. Hvoslef
Box 1347
Dillon, CO 80435
(303) 468-5787

COMMENT 71

Nov. 1/86

To whom it May Concern,

I would like to urge the BLM to prioritize the the protection of wilderness, scenic and recreational values in the San Juan Resource Area, especially in areas BLM identifies as "primitive," "semiprimitive nonmotorized," and "semiprimitive motorized". I also feel it is very important that the BLM manage the lands adjacent to the National Park units (Canyonlands, Hovenweep, Natural Bridges, Glen Canyon National Recreation Area) in a manner that will fully protect park values. Hand in hand with these objectives should be a meaningful program to protect the area's cultural (archeological) resources from degradation.

Please be more open to protecting this area; I know it seems as if there is alot more land than use for it. However, I think you have to admit that it gets more and more use each year. Tourism in the long run will be a much more viable resource each year than allowing a special interest industry to get in there and destroy the beauty of the area.

Thanks for your consideration.

Erik R. Hvoslef

RESPONSE TO COMMENT 71 — ERIK R. HVOSLEF

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from the Utah Wilderness Association.

The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Regarding management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association. BLM recognizes the need to protect cultural resources (draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

Change to the EIS? No.

COMMENT 72

21 Oct. '86

Ed Schenk, Manager
San Juan Resource Area
Monticello, UT.

Dear Sir,

I've just learned a bit about the RMP/EIS for your area & have several concerns.

The preferred alternative doesn't seem to me to begin to provide proper protection for the area's cultural & recreational resources. I've only been there once years ago, but archeologist friends have told me that now, the existing laws are not being enforced strictly enough. It would seem that both special management designations & stipulations are needed along with a much greater acreage - perhaps 7-9 million instead of 1.9. Isn't the projected usage increase put at 20-30% within 15 years? I've seen what that can do recent here. We've had to fence off areas to keep everybody out so the land could try to restore itself - not successfully yet.

I want to bring my children to see your part of the Colorado Plateau, when they're older. Please ensure that there will be a lot left for them to wonder at.

Thank you for your consideration!

Sincerely,
Kathleen Johnson
3257 14th St
Boulder, CO 80302

RESPONSE TO COMMENT 72 KATHLEEN JOHNSON

[Comment page 1]

BLM recognizes the need to protect cultural resources (see draft page 2-6). BLM is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA; this comment offers no specific information to the contrary.

The preferred alternative provides several special designations for cultural resources (see draft table 2-2, page 2-20, and table 2-6, page 2-60, both as revised). Special designations alone do not guarantee a particular level of management. (Stipulations for management of the special designations proposed for the RMP are given in draft appendix A.)

This comment suggests 7 to 9 million acres in SJRA have special management designations instead of 1.9 million acres. The public lands within SJRA cover 1.8 million acres (draft page I-17), and not all of the area is proposed for special designation under any alternative presented.

Recreation use is expected to increase by 25 percent by 2000 (draft page 4-20). Under the preferred alternative, there would be a slight loss of acreage in primitive condition, but this does not correlate to increased use (draft page 4-69.).

Change to the EIS? No.

11-3-86

COMMENT 73

Mr. Ed Scherick, SJRA Manager
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

The Draft Resource Management Plan/ Environmental Impact Statement for the San Juan Resource Area is sadly lacking in its protection of the outstanding landscape and numerous cultural resources of the area under study.

The RMP states "Use and management of cultural resources is specifically governed by law and regulation. The need for protection of these resources is established by law and is beyond the discretion of BLM field office personal." ... "Archaeologically, SJRA is one of the richest locales under BLM management. Of the approximately 17,000 recorded sites in San Juan County it is estimated that over 10,000 are situated on public lands. Archaeologists estimate that the SJRA may hold as many as 200,000 sites." And yet, amazingly, the BLM has chosen not to make cultural resources a planning issue in drafting the RMP! Is this legal?

RESPONSE TO COMMENT 73

WAYNE KING

[Comment page 1]

BLM recognizes the need to protect natural values and cultural resources and is confident that the preferred alternative provides an adequate (and legal) framework for management of cultural resources in SJRA.

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion of the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see revisions to draft page 1-6). See the response given to comment 2, National Parks and Conservation Association.

PAGE 2

The BLM should amend or supplement the draft RMP to identify special management actions the BLM will take to protect cultural resources.

The BLM should ensure adequate protection of our cultural and recreational resources by designation of the following areas as Areas of Critical Environmental Concern or Outstanding Natural Areas.

- Canyonlands Basin, I support an ACEC to protect scenic and cultural values in the Canyonlands Basin. Scenic values are integral to visitor enjoyment of the park and the area contains numerous important archaeological resources. I support and ONA designation for all lands in the Canyonlands Basin.
- Beef Basin, I support an ACEC to protect the scenic and cultural values for all lands between Canyonlands, the forest and Dark Canyon. This area is also crucial to desert bighorn sheep and deer.
- Natural Bridges - I support an ACEC to protect scenic values important to visitor enjoyment of Natural Bridges National Monument. This should include Harmony Flat, Wooden shoes Battes, The Toe and Deer Canyon.

RESPONSE TO COMMENT 73 WAYNE KING

[Comment page 2]

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's nominations for specific areas are accepted. See the response to comment 2, National Parks and Conservation Association, for a discussion of all areas mentioned. BLM has dropped the ONA designation in favor of the ACEC designation.

- Hovenweep, I support a 2000 acre ACEC to protect cultural and scenic values with a boundary consistent with the Hovenweep ACEC proposed under alternative D
- Glen Canyon National Recreation Area, I support an ACEC to protect the scenic, natural, cultural and wildlife values for all lands in the San Juan Resource Area the lie within the Glen Canyon NRA.

Cedar Mesa, I support an ACEC to protect the cultural, scenic, and natural values in the outstanding area. Cultural Resources are significant in this entire area because of the wealth of undisturbed Basketmaker and Pueblo sites. This area is vulnerable to pot hunting. I support an ONA for all roadless lands in the Cedar Mesa ACEC.

- Alkali Ridge, I support an ACEC to protect cultural values
- White Canyon Complex, I support an ACEC to protect scenic and cultural values for the area north of Hwy. 95 and south of the Dark Canyon Plateau. Protection is important to preserve scenic views from Hwy 95 and

PAGE 4

to preserve undisturbed cultural sites.

— Moki - Red Canyon Complex, I support an ACEC to protect cultural and scenic values. The boundary should include the upper ends of Red, Cedar, Forgotten, Knowles, Moki and North Gulch as well as the upper part of Lake Canyon. Cultural resources are important to the understanding and interpetation of cultural data from the Glen Canyon pre-inundation studies and inventories. I have hiked in Moki, Forgotten, and Lake Canyons and have seen evidence of pot-hunting in all three. They need to be protected from further vandalism.

— Dark Canyon and Middle Point, I support an ACEC to protect scenic, natural and cultural values. I support and ONA for the entire area. These ACEC's and ONA's should be closed to oil and gas leasing or at a minimum open to leasing with provisions to prevent surface occupancy. They should limit ORV use to existing roads, except in cultural ACECs where some roads may need to be closed to protect cultural resources. Land treatments, range improvements and vegetation manipulation should be excluded from these ACEC's

RESPONSE TO COMMENT 73 — WAYNE KING

[Comment page 4]

This comment's suggestions regarding management prescriptions for ACECs have been reviewed. See the response to comment 2, National Parks and Conservation Association, comment page 28, on this topic.

PAGE 5

and ONA's.

I feel they should be managed as a Visual Resource Management (VRM) Class I area, with only those projects that meet Class I objectives allowed.

Thes ACEC's and ONA's should be available for livestock use only if such use will not harm the values for which the ACEC or ONA was established.

Development of a Cultural Resource Plan will help highlight to Congress the need for additional funding for cultural resources management in the San Juan Resouree Area.

Thank you for the opportunity to comment on this important issue. I urge the BLM to consider the points I've made in this letter and to implement the much-needed changes in the SJRMP.

Sincerely,
Wayne King
RR1 Box 28A
Churdan, Iowa 50050

RESPONSE TO COMMENT 73 WAYNE KING

[Comment page 5]

The draft identified areas where specific CRMPs would be developed (draft page 2-6 and table 2-7); these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29). Congress appears to be aware of the situation regarding cultural resource management.

Change to the EIS? Yes.

COMMENT 74

October 27, 1986

Ed Scherik
Bureau of Land Management
P.O. Box 7, Monticello, Ut 84535

Dear Mr. Scherik,

I am writing concerning the San Juan Resource Management Plan. I have analyzed all of the alternatives and have found none of them suitable to my taste. I have outlined them as I see.

CULTURAL RESOURCES

Cultural resources in the area, need to be officially inventoried. Astrict set of laws need to be strictly enforced and funding for such enforcement needs to be given. The cultural resources are of national and international quality. After inventorying the sites, specific sites should be designated as off limits; these areas should be excavated at future dates when more sophisticated techniques are available. All of the important sites need to be monitored regularly to reduce the amounts of vandals. Special management areas should be established to include the following areas: Alaki Ridge, Butler Wash, Grand Gulch, Cedar Mesa, Indian Creek, Beef Basin, Table Valley, Tin Cup Mesa and the White Canyon area including the following areas: Cheesebox Canyon, Gravel and Long Canyon.

WILDLIFE:

I support a plan which protects, maintains and improves habitat to facilitate in-increase in the Bighorn sheep herds, the antelope and the deer herds. Livestock use should not interfere with the winter ranges for the Bighorn; o all of the crucial Bighorn habitat should be protected, including the crucial rutting and the lambing areas. All crucial antelope and deer habitat should be protected: this includes restricting livestock grazing, ORV use and other developements.

All livestock SHOULD be restricted from riparian areas; these are delicate spots; each spring needs to be identified and restricted so as not to let the cows into the area.

All threatened and endangered species should be monitored; accurate counts and sightings need to be determined. All efforts should be made to increase the animal and plant populations

Habitat management needs to protect as much land as possible; all WSAs need to be designated as natural succession area and protected and preserved as natural ecosystems(If they are not designated as Wilderness by Congress)

RESPONSE TO COMMENT 74 KIM KOENIG

[Comment page 1]

Cultural Resources

BLM recognizes the need to conduct cultural resource inventories, and has provided for this in the draft RMP (draft page 2-6). Cultural resources will be managed in accordance with all applicable laws (draft page 2-1); the draft assumes that funding and personnel will be sufficient to carry out any plan approved by the State Director (draft page 1-2). The draft provides that some areas will be managed for conservation of cultural sites (draft page 2-6, figure 3-15). Because of the wealth of cultural resource sites in SJRA, regular monitoring of all known significant sites is not possible.

The suggestion regarding establishment of special management areas is noted. The proposed RMP and final EIS considers ACEC potential for all of the areas mentioned in this comment except Tin Cup Mesa, which is considered as a potential archaeologic district (see revisions to draft chapter 2 and appendix I).

Wildlife

The preferred alternative in the draft includes special conditions to protect crucial habitat for bighorn sheep, antelope, and deer (draft appendix A). The approach taken in the draft was to apply the least-limiting level of restriction neccessary to resolve resource conflicts. The draft did not identify conflicts between bighorn sheep and livestock grazing (draft page 3-58). ORV use was restricted using seasonal limitations (draft table 2-8).

The draft incorrectly indicated that livestock would be excluded from all riparian areas under the preferred alternative; this has been corrected (see revisions to draft page A-20). Springs and riparian areas provide water sources for livestock. AMPs will be developed for most of SJRA (draft appendix U); under an AMP, grazing may be excluded in selected riparian areas to improve riparian condition.

BLM agrees that T/E species should be monitored. The draft (page 2-8) provides for surveys to determine the extent of these species.

Under alternative D, all WSAs were included in the natural succession areas; the impact analysis did not show a net benefit to SJRA (draft chapter 4). BLM manages public resources under a multiple-use mandate which allows many uses of the public lands. Most uses involve human intervention and are incongruous with maintaining an undisturbed ecosystem.

WILDLIFE(cont.)

Predators should be protected. Once the grazing is eliminated, predators will return the natural prey balance to a steady state equilibrium.

VEGETATION/GRAZING

The vegetation should be managed to maintain a healthy natural, native community. No nonnatives should be introduced in revegetaton projects. A natural sequence should be determined and then should be strictly adhered to when re-vegetating. No vegetation manipulation or LAND TREATMENTS to increase forage for livestock should be done.

I SUPPORT a NO GRAZING alternative. Complete unnatural manipulation of vegetative communities leading to erosion, desertification, destruction of riparian and spring habitats, intorduction of diseases, a decrease in diversity of plants and animals, a reduction in native plant species, an increase in siltation in the water, a destruction of habitat and a loss of other game animals and predators. all OUTWEIGH the 100 years of ranching that has occurred. The complete healthy ecosystems have been around for thousands of years and Do NOT even begin to compare to a mere 100 years of ranching.

The amount of acres allotted to wildlife should double or triple the amount of acres alloted to cattle. Instead of alloting 17,300 acres to wildlifeand 2,071,350 acres to cattle , 2,071,350 acres should be alotted to wildlife and 17,300 acres to cattle , if not less than that. The healthiness, the diversity and the stability of the system will BENEFIT tremendously from this move.

Revegetation and rehabiliation using native grasses and shrubs should be undertaken to return the heavily overgrazed public lands to a healthy environment. Doing this will improve the availability of water, reduce the erosion of the soil , reduce the salinity of the water and reduce the sediment flow in the water. As the cows are removed from the system, it will tend back to a state where no management is needed. Management would only be needed initially to assist in the initial plant revegetation. Once the healthy community is established, an increase in the predators and the other animals will occur; also a DECREASE in the amount of Money money spent to manage the area will ALSO ocurr. So mich of the or OUR federal money is spent just to support a group of ranchers who often times are running ranches as a second business.

RESPONSE TO COMMENT 74 KIM KOENIG

[Comment page 2]

Very little of SJRA is now subject to federal predator control to protect livestock. Predator control has not been conducted in WSAs. Elimination of grazing would have very little effect on predator populations. Hunting and trapping of predators for sport or fur are current activities in SJRA that would continue to occur with or without livestock grazing. These activities are regulated by the state (UDWR), not by BLM, and are not provided for through an RMP.

Vegetation/Grazing

BLM agrees that the vegetation in SJRA should be managed to achieve a healthy condition. Native plant species are not needed for reclamation in every case; exotic or adventive species are sometimes desirable because they may be more successful in establishing a ground cover, or because they provide greater forage value. BLM does not agree that land treatments should not be conducted.

A no-grazing alternative was not analyzed because it was not realistic or reasonable. BLM is under no obligation to assess a no-grazing alternative where livestock grazing is a historic use in the area (Natural Resources Defense Council Inc., et al. v. Hodel, 624 F.Supp. 1045 (D.Nev. 1985)). Grazing can occur without the types of adverse impacts to the environment cited in this comment if managed under sound range management practices, such as grazing systems, which protect soil and water resources and provide for the physiological needs of plants.

Wildlife use far more than the 17,300 acres allotted to wildlife (draft figures 3-11 and 3-12). Wildlife have access to most of SJRA; livestock do not use all of the acreage included in grazing allotments. In many areas, livestock and wildlife coexist with little or no competition (draft page 3-58). In some areas, such as Beef Basin, livestock grazing can improve habitat used by deer. BLM does not agree that more acres should be allotted to wildlife.

BLM does not consider public lands in SJRA to be overgrazed (draft appendix T). Range monitoring will be used to determine the extent of any damage caused by grazing, and as the basis for adjustments to livestock grazing neccessary to protect range condition (draft page 2-6 and appendixes B and J).

According to BLM records, nearly all of the grazing permittees in SJRA are full-time livestock producers (draft page 3-98).

RECREATION

ALL WSA s and ISA s in San Juan county should be managed as wilderness areas until Congress hasechosen Not to designate them as wilderness. No developement mineral or roads should occur within these areas. Management plans for these proposed ares need to be addressed. Long term management plans need to be made to specifically address the increase in recreationists. ALL WSAs need to have special management designations to facilitate management as wilderness until Congress designates the so. If they are so designated special designation should limit mineral leasing and sales and production, grazing and ORVS; they should be a natural succession area. These area include all of theWSAs: Grand Gulch, Dark Canyon, Slickhorn Canyon, Johns Canyon, Fish abd Owl Canyon, Road Canyon, Line Canyon, White Canyon, Bridger Jack Mesa, Mule Canyon, Mancos Mesa, Cheesebox Canyon, Butler Wash, Indian Creek, Squaw Canyon, and Cross Canyon. The DEIS should address how a all of the adjacent developements would affect the wilderness designation. It Does Not.

ALL ORV use should be designatec to protedt Bighorn lambing, rutting areas, antelopes lambing areas and crucial deer habitat. All ORVs should eliminated from riparian habitat. Strict regulations and enforcement of these regualtions should be adhered to to keep ORVs out of sensitive. ORV use should be limited only to roads and trails.

Recreational developemnts should be little to non- existence. Beef Basin and Indian Creek shouldNOT be developed to motorized recreation.

MINERALS

As the boom/bust economic state exists for all of the minerals: oila and gas, uranium, gold and coal, I urge San Juan county to develope long term economic sources which are environmentally sound and which are not susceptible to strong, economic recessions as the mining boom and bust are. I urge all of the developemnt of minerals be done, ONLY when necessary. Any exploration should be approached with the utmost of care in not destroying any unnecessary areas. Rehabilitation of exploration should be mandatory and should be strictly enforced. In southern Utah the primary consideration in determining exploration and developement poten tial of tar sands, coal and uranium should not be economic. The qualities the are a offers are intangible spiritual ones which so often are not given an economic tag. These qualities qualify Utah as a world heritage site. Long term gains should not be forsaken for short term economic goals.

Low to moderate potential in coal, tar sands, oil and gas and uranium shoul d not be developed or leased. These areas should be designated as natural succession areas. Areas of high potential should ONLY be utilized under extreme circumstances; then in each case reevaluation of each situation should be made to state the environmental concerns of the time. Environmental destruction should be a primary con-

RESPONSE TO COMMENT 74 KIM KOENIG

[Comment page 3]

Recreation

All WSAs and ISAs in SJRA will be managed under the IMP until released from wilderness review by Congress (draft page 1-2 and 2-7). For areas designated as wilderness, a site-specific wilderness management plan will be prepared (draft page 2-7). No wilderness management plan will be prepared prior to wilderness designations.

BLM does not agree that all WSAs need to have special management designations to facilitate management as wilderness. The draft (page 1-2) discusses management of WSAs and ISAs if released from wilderness review by Congress. It is assumed that areas released from wilderness review are to be managed for nonwilderness purposes. Therefore, no attempt was made through the RMP/EIS to apply quasi-wilderness protective management to areas released from wilderness review, or to assess impacts to wilderness values from activities projected to occur under the alternatives in the draft.

ORV use is limited to resolve a specific, documented resource use conflict (see draft appendix E). Table 2-9 (draft page 2-91) indicates, under the different alternatives, where ORV use would be restricted to protect crucial wildlife habitat and riparian areas.

The comments regarding recreational developments and use in Beef Basin and Indian Creek are noted.

Minerals

Neither BLM nor the Federal Government has the authority to dictate the timetable for economic pursuits by private interests, or to tell mineral developers that their primary consideration should be altruistic, not economic.

Because of the nature of the laws governing the development of public mineral resources, economic benefit is the greatest influence on development of these resources. A higher demand for mineral commodities results in development of mineral resources that would be uneconomic if demand were low.

The RMP can be used to determine where minerals development would be inappropriate, based on surface resource conflicts; areas would not be withdrawn from development because of low or marginal mineral-development potential as suggested in this comment. The RMP can also be used to set terms and conditions for minerals exploration and development which conform to the goals and objectives of the plan (draft page 2-12). The different alternatives assessed in the draft provided for these considerations (draft chapter 2 and appendix A). However, the RMP/EIS cannot change the ways in which mineral resources are allocated, or rights to development under law.

BLM agrees that avoidance of environmental destruction should be a primary consideration for activities on the public lands.

MINERALS

sideration and AVOIDED AT ALL COSTS.

Restrictions should be placed on oil and gas companies to force companies to share a exploration information in order to reduce the environmental costs.

I hope the B.L.M. is able to use some long term wisdom in assessing the fate of OUR public lands while deliberating all of these comments. Hopefully the decisions made will be for the GOOD of the LAND. This would be a welcomed change. Thank you for your time.

Sincerely,

Mr. Kim Koenig

Kim Koenig
P.O. Box 1254
Moab, Ut 84532

RESPONSE TO COMMENT 74 KIM KOENIG

[Comment page 4]

There are no provisions under existing laws for the government to force oil and gas companies to share exploration data. The RMP cannot impose conditions on the use of public lands and resources that are outside the scope of law.

BLM also hopes that the RMP provides long-term wisdom in management of public lands and resources. This is the underlying purpose for preparing a land-use plan.

Change to the EIS? No.

COMMENT 75

November 1, 1986

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

Dear Sirs:

We have often travelled to the San Juan Resource Area for our vacations and have frequently visited the areas listed below or places adjacent to them. We have done this over a period of many years, with many of our friends, and we care very deeply about the future of these special places. Therefore we are recommending a number of actions relative to the San Juan Resource Management Plan.

1. Canyonlands Basin

We support "Area of Critical Environmental Concern" (ACEC) designation for all lands in the Canyonlands Basin which are visible from Canyonlands National Park or BLM's Needles and Canyonlands Overlooks (including Hatch Point Cliffs) in order to protect scenic values, and ACEC designation to protect cultural values within the Canyonlands Basin and land between Harts draw and the park boundary. (The southern half of this is not adopted under BLM's alternative E.) We support "Outstanding Natural Area" (ONA) for all Canyonlands Basin land.

2. Glen Canyon National Recreation Area

We support an ACEC designation to protect wildlife, scenic, natural, and cultural values for all lands in this area.

3. Hovenweep

We support a 2000 acre ACEC to protect scenic and cultural values in an area the boundary of which is described under Alternative D (but not in E).

4. Beef Basin

We are in favor of an ACEC here to protect scenic values for the lands south of Canyonlands National Park lying between the Park, Manti-La Sal National Forest and the Dark Canyon Plateau and visible from the park, including areas in Beef Basin, the Dark Canyon Plateau, and Cathedral Butte. We support ACEC status to protect cultural values for all lands between Canyonlands, the forest, and Dark Canyon (in Alternative C but not in E). We

RESPONSE TO COMMENT 75 DR. PAUL B. KUNASZ AND CHELA V. KUNASZ

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's nominations for specific areas are accepted. See the response to comment 2, National Parks and Conservation Association, for a discussion of all areas mentioned. BLM has dropped the ONA designation in favor of the ACEC designation.

are concerned about the desert bighorn and deer, and we wish to include these areas as ACEC for wildlife values as well.

5. Dark Canyon and Middle Point

We support an ONA designation for the entire area and an ACEC as well for both Dark Canyon and Middle Point (scenic, natural, and cultural values).

6. White Canyon Complex

We urge designation of an ONA here. We also support an ACEC for scenic and cultural values in the area north of Utah Highway 95 and south of the Dark Canyon Plateau and the Manti-La Sal National Forest.

7. Natural Bridges

We support an ACEC to protect scenic values for visitors to Natural Bridges National Monument. The area should include Woodenshoe Buttes, the Toe, and Deer Canyon. The boundary should include Harmony Flat (S.E. of the Monument) and the land between the Monument and the National Forest.

8. Cedar Mesa

We support an ACEC to protect cultural, scenic and natural values, with a boundary the same as the archeological district proposed for the area under Alternatives C and D. We support ONA designation for all roadless lands in the Cedar Mesa ACEC.

9. Alkali Ridge

We urge ACEC status to protect cultural values, with a boundary the same as for the Alkali Ridge ACEC of Alternative D.

10. Moki-Red Canyon Complex

We support an ACEC designation to protect cultural values within the upper ends of Red, Cedar, Forgotten and Moki Canyons and North Gulch, as well as upper Lake Canyon.

In general we urge the BLM to make the protection of wilderness, scenic, and recreational values a first priority, especially in areas BLM identifies *as primitive, or semi-primitive (motorized or nonmotorized). We feel* strongly that the BLM should manage lands adjacent to National Park Units (Canyonlands, Hovenweep, Natural Bridges, and Glen Canyon Recreational Area) in a manner that will fully protect park values. Meaningful protection for ACECs and ONAs should include the following: (1) closure to

RESPONSE TO COMMENT 75 DR. PAUL B. KUNASZ AND CHELA V. KUNASZ

[Comment page 2]

Regarding preservation of wilderness values, see the response to comment 13 from the Utah Wilderness Association. The proposed RMP provides for management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

Regarding management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association. BLM recognizes the need to protect cultural resources (draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

This comment's suggestions regarding management prescriptions for ACECs have been reviewed. See the response to comment 2, National Parks and Conservation Association, comment page 28, on this topic.

oil and gas leasing (or, at the very least, prohibition of surface occupancy) (2) limitation of ORV use to existing roads (some roads may even need to be closed in order to prevent vandalism in cultural ACEC's) (3) withdrawal of ACEC and ONA land from mineral entry, or proof that any surface disturbance will not harm cultural resources or scenic values (4) exclusion of the land from livestock use, land treatments, range improvements, and vegetative manipulations unless it can be proved that ACEC/ONA values will not be harmed by such actions (5) banning of private and commercial use of wood products (6) management of the areas as Visual Resource Management Class I areas, with no projects violating Class I objectives allowed for any "scenic" ACEC or ONA.

In addition, the BLM should supplement the San Juan Management plan to include a special management plan for protecting cultural resources with details on such items as increased actions to prevent vandalism, protection of areas until inventories are complete, and development of restrictions for protecting resources from the consequences of ORV, energy exploration, or other potentially disruptive use.

Thank you very much for consideration of the points in this letter. We hope that these suggestions are helpful and that they will be acted on. Please inform us as soon as decisions are made on the the San Juan Resource Management Plan and at any time before that if additional public participation is involved.

Sincerely yours,

Dr. Paul B. Kunasz

Dr. Paul B. Kunasz

Mrs. Chela V. Kunasz

Mrs. Chela V. Kunasz

315 Skylark Way
Boulder, Colorado 80303

RESPONSE TO COMMENT 75 DR. PAUL B. KUNASZ AND CHELA V. KUNASZ

[Comment page 3]

BLM agrees that cultural sites are an important resource in SJRA. The draft provides for CRMPs to be developed for management of specific cultural resource properties or districts (draft page 2-6 and table 2-7).

Change to the EIS? Yes.

COMMENT 76

ST. MARY-CORWIN HOSPITAL
REGIONAL MEDICAL & HEALTH CENTER

NOV 2, 1986

DEAR SIR,

I KNOW & ENJOY THE SE-UTAH AREA. I VISIT THE AREA FOR ABOUT 1½ MONTHS EVERY YEAR. I'M VERY CONCERNED THAT THE SAN JUAN RESOURCE MANAGEMENT PLAN BE DEVELOPED IN SUCH A WAY AS TO KEEP THE AREA AS NATURAL AS POSSIBLE. THE SIGHT OF CHAINED PIÑON-JUNIPER FORESTS IS SICKENING. OFF-ROAD VEHICLES SEEM TO GO ANYWHERE & CUT UP THE LAND. CULTURAL ARTIFACTS ARE BEING LOOTED. DEVELOPMENT SCHEMES ARE IN THE WORKS WHICH WOULD ALTER THE AREA SO THAT IT IS JUST ANOTHER SCARRED POLLUTED SCENE LIKE THE OTHER 99% OF THE COUNTRY'S LAND. UTAH DESERVES BETTER BECAUSE THE LAND IN THE SAN JUAN MANAGEMENT AREA IS STILL RELATIVELY PRIMITIVE AND IT DESERVES TO STAY THAT WAY. ALSO, YOUR ECONOMY WILL BE INCREASINGLY SUPPORTED BY PEOPLE WHO COME TO ENJOY THE SCENIC BEAUTY.

THE NATIONAL PARKS & CONSERVATION ASSOCIATION HAS MADE RECOMMENDATIONS TO YOU REGARDING THE DETAILS OF THE MANAGEMENT PLAN & I WILL ENCLOSE A COPY OF SOME RECOMMENDATIONS BECAUSE I AM COMPLETELY IN AGREEMENT WITH THEM.

1000 Minnequa Avenue / Pueblo, Colorado 81004-9988 / 303-560-4000

(OVER)

RESPONSE TO COMMENT 76 DAVID LENDERTS

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values.

No chainings have been done on public land in SJRA since 1972 (draft page 3-58). Recreational ORV use in SJRA currently occurs primarily in the northern and eastern parts of SJRA (draft figure 3-16). BLM knows of no "development schemes" proposed at this time for public lands or resources in SJRA, nor any schemes that would result in a "scarred polluted scene"; this comment offers no information as to specific projects.

Regarding the suggested special designations, see the response to comment 2 from National Parks and Conservation Association. BLM has dropped the ONA designation in favor of the ACEC designation.

I STRONGLY FEEL THAT AREAS BORDERING ON NATIONAL PARKS NEED TO BE MANAGED IN SUCH A WAY AS TO ENHANCE THE BEAUTY & NATURALNESS OF THE PARK.

A PRIORITY MUST BE GIVEN TO PROTECT WILDERNESS AREAS FOR COMPATIBLE RECREATIONAL USE & THIS INCLUDES ONLY MINIMAL ADDITION OF ROADS & NO OFF-ROAD VEHICLE ACCESS.

ARCHEOLOGICAL SITES MUST BE LOCATED & PROTECTED.

I AM CERTAINLY SYMPATHETIC TO ECONOMIC PROBLEMS CAUSED BY THE DROP-OFF IN THE URANIUM, OIL/GAS, AND MINING INDUSTRIES. YET, WE MUST DEVELOP AN ECONOMY WHICH DOES NOT DESTROY THE LAND. THERE IS TOO LITTLE OF WHAT IS BEAUTIFUL LEFT IN THE U.S.

I WILL LOOK CLOSELY AT DECISIONS WHICH YOU MAKE IN THIS RESOURCE AREA, AND I THANK YOU FOR YOUR CONSIDERATION OF MY VIEWS

SINCERELY,

David Lenderts M.D.

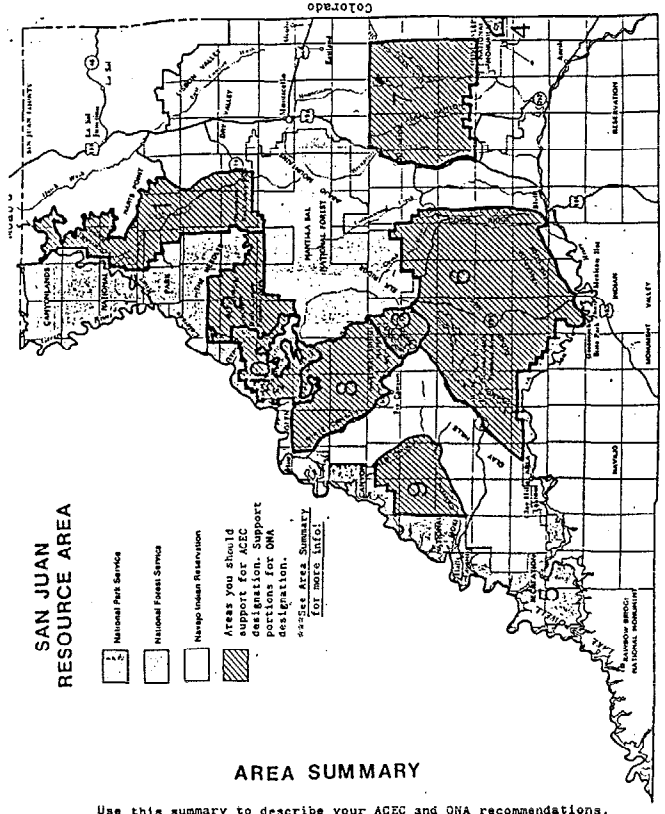
RESPONSE TO COMMENT 76 DAVID LENDERTS

[Comment page 2]

Regarding management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association. Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

BLM recognizes the need to protect cultural resources (draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

Change to the EIS? No.



AREA SUMMARY

Use this summary to describe your ACEC and ONA recommendations. Numbers correspond to areas marked on map.

1. CANYONLANDS BASIN

--support an ACEC to protect scenic values for all lands in the Canyonlands Basin which are visible from Canyonlands N. Park or BLM's Needles and Canyonlands Overlooks. (This includes the Hatch Point Cliffs.) Scenic views are important because they are integral to visitor enjoyment of the Park. The northern part of the Canyonlands basin (Lockhart Basin) is recommended as a "scenic" ACEC under alternative C, but not adopted under BLM preferred alternative E.

--support an ACEC to protect cultural values for all lands within the Canyonlands Basin and for all lands between Harts Draw and the park boundary. The southern half of this area is recommend under alternatives C&D as a "cultural" ACEC, but not adopted under BLM's preferred alternative E.

Important cultural resources include unique rock art sites, at least one archeoastronomy site and sites important to the understanding of the Salt Creek Archeological District, located within Canyonlands N. Park.

--support an ONA for all lands in the Canyonlands Basin.

continued

.BEEF BASIN

--support an ACEC to protect scenic values for the lands south of Canyonlands N. Park lying between the Park, Manti-La Sal N. Forest and the Dark Canyon Plateau which are visible from the Park. This includes portions of Beef Basin, Dark Canyon Plateau and Cathedral Butte. Scenic views are important to visitor enjoyment of Canyonlands National Park.

-support an ACEC to protect cultural values for all lands between Canyonlands, the forest and Dark Canyon. This area includes areas proposed for archeological district designation (Beef Basin and Fable Valley) under alternative C, but not adopted under BLM's preferred alternative E.

This area also includes important widlife values--crucial desert bighorn and deer.

.NATURAL BRIDGES

-Support an ACEC to protect scenic values important to visitor enjoyment of Natural Bridges N. Monument. Boundary should include Harmony Flat (southeast of the Monument) and the lands between the Monument and the National Forest. This area should include Woodenshoe Buttes, The Toe, and Deer Canyon.

.HOVENWEEP

-support a 2000 acre ACEC to protect cultural and scenic values. Support a boundary consistent with the Hovenweep ACEC proposed under alternative D (but not adopted under BLM's preferred alternative E.) Cultural resources in this area are an integral part of the archeological sites within Hovenweep National Monument, and are important to understanding Hovenweep's sites. Scenic protection is essential to preserve Hovenweep's historic scene. In their 1985 EA for the Hovenweep Management Plan, the National Park Service has suggested that this 2000 acre area be protected by adding it to the park or designating it an ACEC with strong stipulations to protect values.

5.GLEN CANYON NATIONAL RECREATION AREA

--Support an ACEC to protect scenic, natural, cultural and wildlife values for all lands in the San Juan Resource Area that lie within Glen Canyon National Recreation Area. The BLM manages grazing and mining in Glen Canyon even though it is a unit of the National Park System.

6.CEDAR MESA

--support an ACEC to protect cultural, scenic and natural values. Propose a boundary consistent with the archeological-district proposed for designation under alternatives C&D (but not adopted in BLM's preferred alternative E). Area includes Grand Gulch, Johns, Slickhorn, Fish and Owl, Lime, Road, Mule and Arch Canyons and Comb Ridge--all containing outstanding natural, scenic and cultural values. The Plan notes that cultural resources are significant in this entire area because of the wealth of undisturbed Basketmaker and Pueblo sites. Area is vulnerable to pot-hunting.

--support an ONA for all roadless lands in the Cedar Mesa ACEC.

7.ALKALI RIDGE

--support an ACEC to protect cultural values. Support a boundary consistent with the 170,120 acre Alkali Ridge ACEC proposed under alternative D (but reduced to only 35,890 acres under BLM's preferred alternative E.) The area is important because of irreplaceable Basketmaker and Pueblo Village sites, often reaching densities of 200 sites per square mile. Site are very vulnerable to energy exploration and development, vandalism, road construction and maintenance, and proposed vegetation manipulations.

8.WHITE CANYON COMPLEX

--support an ACEC to protect scenic and cultural values for the area north of Utah highway 95 and south of the Dark Canyon Plateau and the Manti-La Sal N. Forest. Includes Chessebox, Gravel, Long, Fortknocker canyons and landmarks such as Jacob's Chair. Protection is important to preserve scenic views from U-95 and to preserve undisturbed cultural sites.

--support an ONA for this area.

9.MOKI-RED CANYON COMPLEX

--support an ACEC to protect cultural values. Boundary shouldinclude the upper ends of Red, Cedar, Forgotten and Moki Canyons and North Gulch. Should also include upper Lake Canyon. Cultural resources are important to the understanding and interpretation of cultural data from the Glen Canyon pre-inundation studies and inventories.

10.DARK CANYON AND MIDDLE POINT

--support an ACEC to protect scenic, natural and cultural values. Importance derives from pristine character of outstanding natural and scenic values. BLM adopts a Dark Canyon ACEC under its preferred alternative E but excludes

COMMENT 77

Wednesday Morning—October 29, 1986
Section B Page 1

New Utah Coalition Opposes More Wilderness Areas

Group Claims Wilderness Act Hurts State's Jobs, Economy

By Jim Woolf
Tribune Environmental Writer

A new coalition to oppose the designation of additional wilderness in Utah was unveiled Tuesday.

"The key issue is the economy of Utah — jobs, jobs, jobs," said C. Booth Wallentine, executive vice president of the Utah Farm Bureau Federation and chairman of the newly formed Utah Public Lands Multiple Use Coalition.

". . . Designation wilderness as defined by the National Wilderness Act means locking up the lands, cutting off the jobs, taking away the grazing, eliminating mineral extraction, turning back the sportsmen, the handicapped and the elderly. Many Utahns do not understand that wilderness designation of state and federal lands significantly cuts into the economy," said Mr. Wallentine during a press conference at the state capitol.

Members of the anti-wilderness coalition are: Utah Association of Counties; Utah Cattlemen's Association; Utah Farm Bureau Federation; Utah Forest Industry Council; Utah Manufacturers Association; Utah Mining Association; Utah Petroleum Association; Utah Taxpayers Association; and Utah Wool Growers Association.

Mr. Wallentine characterized the coalition as "the propellant force behind jobs in Utah."

Because of its concerns about wilderness, the coalition will launch a statewide educational campaign on the economic problems associated with wilderness and lobby hard to prevent the passage of another wilderness bill in Utah.

Congress last year authorized the creation of 750,000 acres of wilderness in Utah on lands controlled by the U.S. Forest Service. The Bureau of Land Management has recommended the designation of 1.9 million acres of wilderness on its Utah lands. Conservation groups would like to see much more wilderness than suggested by the BLM.

Mr. Wallentine said coalition members favor "protection and wise use of our natural resources," but oppose the severe restrictions imposed by wilderness designation.

The fact that hundreds of thousands of acres of land in Utah remain in near pristine condition is proof of the "outstanding job" federal land agencies have done at managing their property without the wilderness designation, he said.

Michael R. Sibbett, executive vice president of the Utah Cattlemen's Association, said wilderness designation is no guarantee that a parcel of land will be protected. Indeed, he said wilderness can prevent the use of "modern techniques" needed to protect lands.

He asked, for example, whether Utahns would prefer to visit a carefully managed forest of "tall trees" or a wilderness area ravaged by "insects, noxious weeds and wild fires."

Mark Walsh, representing the Utah Association of Counties, said Utahns don't yet understand the economic consequences of designating wilderness in their state. In addition to "locking up" valuable resources within their boundaries, Mr. Walsh said wilderness designation could result in restrictions on adjacent "buffer" lands.

And if wilderness areas are designated "class one," or pristine air quality areas, Mr. Walsh said serious restraints would be imposed on the state's economic growth.

Clair Acord, executive secretary of the Utah Wool Growers Association,

See B-3, Column 4

Please compare this article with the other that I have enclosed. Visitors come to see Utah's scenery and imagine geologic formations but our grazed land + mineral development which must share the land

RESPONSE TO COMMENT 77 MARJORIE G. LEWIS

[Comment page 1]

BLM agrees that SJRA contains appreciable scenic and natural resource values.

Regarding preservation of wilderness values, see the response to comment 13 from the Utah Wilderness Association.

A plea for Alternative D
from Marjorie G Lewis
1277 E 100 S
LOGAN, UT 84321

Up and Down the Street

A Surprise: Many Visitors to Utah Are Rich, Non-LDS Professionals

By Robert H. Woody
Tribune Business Editor

Who visits Utah in summertime?

Hey, it isn't mom and pop and the kids — welcome as they are — with travel gear tied on top of the car, and expectations of a welcome bath and bed at homes of Mormon relatives.

Mostly, the visitors are an affluent and well-educated lot of professionals and mid-managers who, for the most part, stay in local motels and hotels, and eat at local restaurants, according to a new survey.

And they like what they see, but not necessarily what they eat. And if they haven't been to the state before, they do find local liquor laws a bit annoying.

The profile of the affluent summertime visitor comes as bit of a surprise, says Douglas C. Frechtling, director of the U.S. Travel Data Center, Washington, D.C., and Jay C. Woolley, director of the Utah Travel Council.

For when they undertook the survey earlier this year, they had expected more of the budget-conscious family type of visitor with religious ties to the Church of Jesus Christ of Latter-day Saints.

But only 13 percent surveyed were Mormons.

The survey was done at 21 sites — from Temple Square in downtown Salt Lake City to Bryce Canyon.

And it is another step in a $160,000 study that will be wrapped up by by next September to help the state fine tune its tourism pitch.

Mr. Frechtling's group is the lead investigator.

The study team did 1,835 interviews.

Forty-three percent of the re-

Robert H. Woody
Business Editor

spondents reported family incomes of more than $40,000; 13 percent, more than $60,000.

Nationally, only 5 percent of U.S. families report income over $60,000, says Mr. Frechtling.

A majority were considered to be from professional, managerial or technical ranks.

The difference between what researchers had expected of visitors and what showed up in the survey, is an echo of misperceptions of the state by outsiders in a study in the early 1970s by John Hunt, a former Utah State University professor.

Namely:

There was the perception that Utah was a desert state, and that — because of the local Mormon culture — inhabitants wore black suits and gowns and were topped by black, broad-brimmed hats and bonnets like those of Pennsylvania's Amish.

Mr. Hunt, now a professor of tourism at George Washington University, Washington, D.C., is a participant in the newest study.

The Utah Travel Council is putting up $100,000 for the two-year study; the Salt Lake Convention and Visitors Bureau, $60,000.

Mr. Frechtling's group is the lead investigator.

Another finding in the latest study:

Fifty-four percent said Utah was their travel destination. They were not just "passing through."

Average stay for all respondents was 3½ days.

They ranked friendliness high Utah cuisine got a lower mark.

They were astonished by the diversity of scenery.

Each party spent $65 daily in the state.

A whopping 16 percent came by air — a level that surprised the researchers.

It is generally understood that many winter ski visitors come by air, but not summer visitors.

More will be known about the winter visitor after the local firm of Dan Jones & Associates completes a Dec. 1 to March 31 series of interviews.

Where are the visitors coming from?

Relatively close and with 24 million in population, California supplied most of the visitors — 19 percent. Next was Arizona, with 6 percent. Colorado — with whom Utah has long been waging a tourist war — followed with 5 percent.

States east of the Mississippi provided 24 percent of the visitors. The lead states were New York and New Jersey with three and two percent, respectively.

Twelve percent were from outside the U.S. although language complications might have marred accuracy of the tally. Surprisingly, Canadians accounted for only one out of four foreign visitors. The others were from overseas.

And, says Mr. Woolley, most of the "others" are Germans who, by nature, like the robust hiking, cooking and camping opportunities Utah affords them.

RESPONSE TO COMMENT 77 MARJORIE G. LEWIS

[Comment page 2]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

The RMP/EIS has analyzed the projected increase in tourism and related economic benefits expected to occur under the preferred alternative (draft chapter 4).

Change to the EIS? No.

COMMENT 78

William J. Lockhart
P.O. Box 8672
Salt Lake City, Utah 84108

November 3, 1986

Ed Scherick
San Juan Resource Area Manager
U.S. Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

Roland Robison
State Director
U.S. Bureau of Land Management
Suite 301
324 South State Street
Salt Lake City, UT 84111-2303

Re: Comments on draft San Juan Resource Management Plan

Dear Sirs:

This is to advise that I join in and incorporate by reference the comments and requests submitted with regard to the above draft management plan by Terri Martin on behalf of the National Parks and Conservation Association and by the Southern Utah Wilderness Alliance.

In particular, I wish to emphasize the need for the State Director to issue detailed guidance to the Moab District and San Juan Resource Area regarding the plan's serious failure to assure consistency with the resource values and uses of National Park Service lands adjacent to the San Juan BLM lands, as well as consistency with the specific management plans of the specific Park units. In particular, the plan fails to deal with key issues which I requested to be addressed in my prior letter of February 2, 1985, concerning the inadequacy of the preplanning analysis. (Copy enclosed.)

As NPCA's comments make clear, detailed guidance is also needed to deal with--

(a) The failure to address cultural resources as a planning issue, and the failure to develop an adequate factual basis for assessing the impacts on cultural resources that will result from alternative management proposals; and

(b) Application of proper standards and procedures in identifying and considering appropriate protection for "areas of critical environmental concern."

Because of these and other inadequacies discussed in NPCA's comments, I join in the request that these fundamental deficiencies be remedied in a new draft plan and EIS to be made available for public comment. Particularly in failing to provide

RESPONSE TO COMMENT 78 WILLIAM J. LOCKHART

[Comment page 1]

See the response to comment 2, National Parks and Conservation Association, and comment 9, Southern Utah Wilderness Alliance. BLM has dropped the ONA designation in favor of the ACEC designation.

Regarding State Director's guidance for this RMP, see response to comment 2, National Parks and Conservation Association, comment page 13.

an adequate basis for analysis of the above issues, the current draft is "so inadequate as to preclude meaningful analysis" by the public, requiring preparation and circulation of a revised draft. 40 CFR § 1502.9(a).

Sincerely,

William J. Lockhart

William J. Lockhart

RESPONSE TO COMMENT 78 WILLIAM J. LOCKHART

[Comment page 2]

BLM is confident that the proposed RMP provides an adequate framework for management of public lands and resources in SJRA, and that both the draft and final EIS present a realistic and adequate analysis of the projected impacts of the alternative plans presented, in keeping with Section 102(2)(C) of NEPA and the CEQ regulations cited in this comment. Accordingly, this proposed RMP and final EIS is believed sufficient to respond to public comments on the draft and to present revisions to the draft based on public and agency review.

Change to the EIS? No.

William J. Lockhart
P.O. Box 8672
Salt Lake City
Utah 84108

2 February 1985

Roland G. Robison
State Director
U.S. Bureau of Land Management
U.S. Department of the Interior
Third South and State Street
Salt Lake City, Utah

Gene Nodine, District Director
Moab District
Edward R. Scherick, Area Manager
San Juan Resource Area
U.S. Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Re: San Juan Resource Management
Plan, Preplanning Analysis

Dear Sirs:

This letter protests and asks your reconsideration of certain decisions about the scope and content of the above resource management plan as reported in your preplanning analysis transmitted under cover of your letter of 25 January 1985.

While the four planning issues discussed in your preplanning analysis are important concerns, the failure to include many of the additional planning issues identified by the public and arising from major activities anticipated in the region is clearly inconsistent with the planning objectives of the Federal Land Policy and Management Act.

The FLPMA planning process was explicitly designed to assure that critical issues affecting present and future uses of the public lands, particularly controversial or conflicting uses or potential uses, would be considered and addressed in an open and public process.

Your current preplanning analysis attempts to avoid public accountability for addressing certain of the difficult planning and use issues that are already occurring or are imminent in the San Juan Resource Area. If your planning process is to comply with FLPMA, those issues cannot be avoided. Furthermore, the basis on which you explain your declination to address many key issues is unsound. Specifically, the assertion that many of those key issues will not be addressed because they are "not discretionary" is

inaccurate as a matter of law and is inconsistent with the repeated claim and exercise of discretionary authority asserted by BLM.

This letter requests:

1. That BLM revise its identification of the planning issues to be addressed in the San Juan RMP to include issues affecting use of the public lands for possible development of a nuclear waste repository and potential conflicts between that development and scenic, recreational, aesthetic and cultural values, particularly those of Canyonlands National Park.

2. That BLM revise its identification of the planning issues to include issues addressing the conflicts between mineral development and the scenic, recreational, aesthetic and cultural values of the area, particularly as those conflicts may affect Canyonlands National Park.

3. As obviously required by the above issues, that BLM revise its identification of "criteria for problem identification" to require that consideration of "problem areas" include the conflict between existing and proposed uses, and conflicts between different proposed uses.

4. That BLM revise or supplement its present preplanning analysis to address the issues that are likely to arise from the proposed transfer of Forest Service lands to BLM management.

In addition, if BLM persists in refusing to consider any of the above issues, it is specifically requested, pursuant to 5 U.S. Code, section 555(e), that the undersigned be supplied with a statement of the basis for the conclusion that the various issues listed on pages 13 and 14 of your preplanning analysis should be eliminated or disregarded on the ground that:

> "management of the resource is governed by specific laws and regulations or is otherwise not discretionary with the area manager."

Similarly, it is requested that the authority to disregard a major issue on the ground that it involves a "certain site or incident" be supplied. If that has reference to, e.g., the problems associated with the proposed nuclear waste repository, your preplanning analysis offers no basis for disregarding the massive planning and management impacts of that project on the public lands.

Finally, with reference to the planning issues associated with the proposed nuclear waste repository, it should be emphasized that the importance of that issue and the need for FLPMA planning to address it has been repeatedly raised with the MOAB DISTRICT since at least July 1982. See Notice of Appeal to Board of Land Appeals transmitted by my letter of 19 July 1982. Repeated requests to the Moab District to address this problem were answered by the District

Manager on 14 August 1984, assuring that:

> "Moab District BLM will complete a plan amendment in compliance with 43 C.F.R., Part 1600, at the time the Davis and Lavender Canyon sites are nominated as suitable for site characterization."

The undersigned has previously protested that conclusion on the ground that the planning process should address the issue before the crucial decisions are made. See attached letters of 27 October 1984 to Gene Nodine and to Roland G. Robison, and references to extended previous correspondance on this issue. If BLM is going to persist in this position, it is requested that some statement of the legal and factual basis for that decision be supplied to the undersigned.

Sincerely,

William J. Lockhart
Pro Se, and as
Attorney for the National Parks
and Conservation Association,
Friends of the Earth, the Utah
Wilderness Association and
the Don't Waste Utah Campaign

COMMENT 79

Ed Scherick, Manager
San Juan Resource Area
BLM, P.O. Box 7
Monticello, UT 84535

26 October 1986

Subject: Draft Resource Management Plan/Environmental Impact Statement for the San Juan Resource Area

Dear Mr. Scherick:

Protection of cultural resources is not adequately addressed in the RMP/EIS. I am urging you to use both special management designations (such as areas of critical environmental concern) and stringent management stipulations to insure adequate protection of cultural resources. I have several personal experiences with degradation of cultural resources which I will cite as examples of the need for strong management guidance. Each time I revisit the ruins in the Beef Basin area, I see more ORV tire tracks, evidence of vandalism, and even some archeological destruction due to agricultural operations. I have seen where graineries hidden in the tributaries of White Canyon have been knocked down. I have seen piles of excavated earth inside natural alcoves in the same area, indicating Shumway-type vandalism.

In addition, I am urging you to use both special management designations (such as ACECs and Special Recreation Management Areas) and stringent management stipulations to insure adequate protection of primitive recreation resources. I was astonished during my last visit to Comb Wash. It was overrun with ATCs and dirt bikes. Meanwhile, more and more wild areas, such as Red Canyon and the White Canyon tributaries, are being overused by hikers and horsepackers. Grand Gulch and Dark Canyon require special protection designations, for they are completely overrun with hikers. One Memorial Day weekend, a family held its reunion in lower Dark Canyon. Forty family members were bathing, camping and hiking in the same area, and a constant stream of hikers passed through them.

Please help protect BLM cultural and recreational resources in the San Juan Resource Area.

Sincerely,

Tony Merten

Tony Merten, Box 261112, Lakewood CO 80226-1112

RESPONSE TO COMMENT 79 — TONY MERTEN

[Comment page 1]

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The proposed RMP provides for designation of ACECs to protect cultural resources, and for development of CRMPs (draft page 2-6 and table 2-7); these would include management prescriptions to protect cultural properties from other surface uses (draft appendix A, as revised).

ACECs would not be designated solely to protect recreation opportunities, although they may be designated to protect natural and scenic values leading to recreational uses. The preferred alternative provides for the designation of SRMAs, which would be the basis for recreation activity planning (draft page 2-7 and table 2-7). The proposed RMP would also limit ORV use in areas where conflicts with other surface resources exist (draft table 2-8 and appendix A).

Both Dark Canyon and Grand Gulch would have special designations under the proposed RMP. Regulation of visitor use would be determined through an activity plan, prepared after completion of the RMP (draft page 2-1 and A-29).

Change to the EIS? No.

COMMENT 80

Polly Mills
Farrand Hall 356
Boulder CO
80310

Bureau of Land Management
San Juan Resource Area
Po Box 7
Monticello Utah 84535

October 30, 1986

Dear Sir:

I have grown aware of the recent wilderness project in southeastern Utah. I think that it is important, however, for this project to be up-graded.

The protection of wilderness, including historical, cultural, and recreational areas, is vital in our world. With careful management, the Areas of Critical Environmental Concern and Outstanding Natural Areas could prove to becoming outstanding, resourceful areas.

These areas include:
ACEC
Canyonlands Basin, Natural Bridges, Hovenweep, Beef Basin, Glen Canyon Nat'l Rec. Area,

RESPONSE TO COMMENT 80 POLLY MILLS

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from the Utah Wilderness Association.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response given to comment 2, submitted by the National Parks and Conservation Association, for a discussion of these areas.

Cedar Mesa, Alkali Ridge, White Canyon Complex, Moki-Red Canyon Complex, Dark Canyon and Middle Point.

ONA

Canyonlands Basin, White Canyon Complex, Cedar Mesa, Dark Canyon and Middle Point.

Thank you for your time.

Sincerely,

Polly Mills

RESPONSE TO COMMENT 80 POLLY MILLS

[Comment page 2]

BLM has dropped the ONA designation in favor of the ACEC designation.

Change to the EIS? No.

Dear BLM, 10-30-86 COMMENT 81

Please use special management designations (ACECs & SRMAs) and stipulations to protect the unique cultural and primitive recreational resources of the San Juan Resource Area. I personally object people defacing cave drawings and taking pottery pieces. Also, the San Juan Resource Area has some of the best wildlands. Please protect these wild places. "Wilderness, ~~is the~~ and the idea of wilderness, is the permanent home of the human spirit," wrote Joseph Wood Krutch

We have but 80 years
to witness the wonders of wilderness,
and having witnessed them,
to protect them,
that they remain wild
for future generations to witness.

Sincerely, Jim Morris
1975 Norwood
Boulder, CO 80302

RESPONSE TO COMMENT 81 JIM MORRIS

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. The proposed RMP provides for designation of SRMAs to better manage recreational values, including primitive recreational opportunities (draft table 2-7 and appendix A). BLM recognizes the need to protect cultural resources (see draft page 2-6), and the proposed RMP includes ACECs designated to protect cultural resources (see revisions to draft chapter 2 and appendix I).

Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

Change to the EIS? No.

COMMENT 82

October 18, 1986

Ed Sherick
Manager, San Juan Resource Area
Monticello, Utah

Dear Mr. Sherick:

I'm writing to ask you to maintain as much area as possible in a pristine, wilderness state in your resource management plan. From what I've see, not nearly enough area is designated this way

I clearly remember the excitment of seeing petroglyphs and mountain lion tracks in remote, nearly untravelled canyons. This excitment should remain a possibility for people in the years to come.

Sincerely,

Dr. Daniel Murphy

Daniel Murphy
1556 Sunset Blvd
Boulder CO 80302

RESPONSE TO COMMENT 82 DANIEL MURPHY

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

The opinions expressed in this comment are noted.

Change to the EIS? No.

October 30, 1986

COMMENT 83

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

Dear Sirs:

I am writing in regard to your draft San Juan Resource Management Plan. This section of the country is probably the most unusual and spectacular area of its kind. Both the wilderness canyon country and the incredible archeological sites in this area are unsurpassed. It is because of my deep concern and love for this area that I am urging you to protect this natural (and national) resource by enacting the following strategies in your RMP:

(a)prioritize the protection of wilderness, scenic and recreational values in the San Juan Resource Area. Especially vulnerable and valuable are the primitive, semi-primitive andsemi-primitive non-motorized areas.

(b)manage the areas adjacent to the National Parks and Monuments in a way which will protect the values the parks were created for.

(c)do something to protect the archeological resources of the area from destruction by ORV use and pot hunters.

These general guidelines can be implemented by declaring certain regions as Areas of Critical Environmental Concern and/or Outstanding Natural Areas. Areas I believe merit these distinctions are listed below.

Canyonlands basin
Hovenweep (using boundaries given in alternative D)
Glen Canyon National Recreation Area
Cedar Mesa
Alkali Ridge (using boundaries given in alternative D)
Beef Basin
Natural Bridges
White Canyon Complex
Moki-Red Canyon Comlex
Dark Canyon and Middle Point

RESPONSE TO COMMENT 83 JEFF NELSON

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values.

Following are responses to the specific points raised:

a. Regarding preservation of wilderness values, see the response to comment 13 from the Utah Wilderness Association. The proposed RMP provides management to protect scenic and primitive and semiprimitive recreational values (see revisions to draft appendix A).

b. Regarding the comment on management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association.

c. BLM recognizes the need to protect cultural resources (draft page 2-6), and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendixes H and I). This comment's suggestions for specific areas and management actions are noted. See the response to comment 2, submitted by the National Parks and Conservation Association, for a discussion of these areas and management options required.

BLM has dropped the ONA designation in favor of the ACEC designation.

(2)

October 30, 1986

These ACEA's and ONA's should be managed in a way which will preserve their scenic and recreational qualities. Therefore they should be:

- closed to oil and gas leasing which involves surface impacts
- limited use ORV areas to keep ORV's on existing roads
- withdrawn from mineral entry
- available for grazing use only if this use is not detrimental to the qualities for which the area was designated
- excluded from land treatments, range improvements and vegetative manipulation unless these actions do not degrade the qualities the area was designated for.
- excluded from all private and commercial use of woodland products
- managed as a Visual Resource Management Class I area.

This part of the country is unique in the world. Nowhere else can the kind of country found here be explored and enjoyed. I therefore urge you to do all you can to insure that it will remain a beautiful and scenic area both now and in the future. Thank you very much.

Sincerely yours,

Jeff Nelson
4300 Whitney Pl.
Boulder, CO 80303

RESPONSE TO COMMENT 83 JEFF NELSON

[Comment page 2]

The suggestions for management of ACECs are noted.

The draft RMP/EIS applied the least restriction necessary to resolve specific resource conflicts.

Change to the EIS? No.

Mr. Murray Pope
P.O. Box 475
Snowmass, CO 81654

COMMENT 84

October 30 1986

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

Re. Draft Resource Mgmt. Plan

For many years I have been a frequent visitor to the San Juan area of the Colorado Plateau and I believe I am familiar with the appropriate proportions of development versus recreational + cultural values.

There are many areas of concern, in which the BLM "Preferred alternative E" is woefully inadequate, but in the interest of brevity I will address just three "general" and three "specific" points

General,

(1) I feel that extremely inadequate importance has been given to the scenic, wilderness, and non-destructive recreational value of these areas that BLM has identified as "primitive", "semi-primitive nonmotorized", and

(over →

RESPONSE TO COMMENT 84 MURRAY POPE

[Comment page 1]

General

1. The proposed RMP has identified several management prescriptions to protect scenic and recreational values in SJRA. Regarding protection of wilderness values, see the response given to comment 13, Utah Wilderness Association.

2-

semi-primitive motorized."

(2) BLM should immediately institute a really forceful program to protect this area's archeological resources.

(3) Lands adjacent to established units in the National Park system, such as Havenweep, Natural Bridges, Canyonlands, and Glen Canyon Nat. Recreation Area should be managed in a way that will fully protect the values set by the National Parks.

Specific:

(1) Limit "off-road vehicle" use to existing roads. This single policy could do much to protect many of the resources. ORV enthusiasts have plenty of areas in which to operate, where the inevitable destruction by such vehicles can be of much less consequence.

(2) BLM has failed to adequately recognize the absolutely vital importance of cultural resource protection. The Draft Management Plan admits that there may

RESPONSE TO COMMENT 84 MURRAY POPE

[Comment page 2]

2. BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The draft (page 2-6 and table 2-7) identified areas where specific CRMPs would be developed; these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29).

3. Congress did not direct that public lands adjacent to NPS units be managed to protect park values. See the response to comment 2 from National Parks and Conservation Association for a discussion of this topic.

Specific

1. The draft RMP/EIS applied the least restriction neccessary to resolve specific resource conflicts. The limitation to existing roads and trails is considered more restrictive than necessary in many areas, and would be applied only in those situations where this level of management is warranted.

2. Both the draft and the proposed RMP provide many management tools to protect cultural resources. The draft provides for ongoing inventory of cultural resources (page 2-6), the protection of cultural resource sites (appendix A), and the development of CRMPs (page 2-6 and table 2-7). The draft also provides for establishment of cultural resource management zones (draft pages 2-6 and 3-60, figure 3-15, and table 3-9).

3.

be several hundred thousand actual archaeological sites and that the rate of disturbance, destruction, and outright theft is increasing. This should be one of the most important planning issues in the entire Plan, with immediate action taken to identify and inventory these areas and implement procedures for their protection.

If sufficient emphasis is placed on the importance of these cultural resources the Congress would recognize the need for sufficient funding for such a program.

(3) Adequate boundaries must be established to protect cultural and scenic values. Hovenweep is a prime example of this need. The 2000 acre area recommended by the National Park Service should either be added to the Monument or these values should be protected by being added or designated as an ACEC.

I trust the BLM will consider the concerns addressed here. Thank you!

Sincerely,

Murray Pope

MURRAY POPE

RESPONSE TO COMMENT 84 MURRAY POPE

[Comment page 3]

Protection of cultural resources, along with the reasons why management of cultural resources did not qualify as a planning issue, is discussed in more detail in the response to comment 2, National Parks and Conservation Association. Congress is aware of the need to protect cultural resources.

3. The proposed RMP proposes ACEC designation for the area adjacent to Hovenweep. The proposed ACEC is the resource protection zone identified by NPS, and includes about 1,500 acres of public land in SJRA. Because BLM cannot determine boundaries of NPS units, expansion of Hovenweep NM cannot be resolved through the RMP.

Change to the EIS? No.

COMMENT 85

October 23, 1986

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

Dear Sir:

I would like to submit my comments on the draft resource management plan for the San Juan area.

It is my opinion that the area under consideration is unique in the United States by virtue of it's cultural history and the remains of that culture that are in desperate need of protection from damage both intentional and unintentional. This historical character in combination with unique scenic and ecological characteristics require a special level of protection that does not seem to be adequately addressed in the draft RMP.

Specifically, I would like to see an ACEC for the areas near Hovenweep be included in a preferred alternative. The Canyonlands basin area, including the land between Harts Draw and the park should also become an ACEC. The Cedar Mesa area, by your own analysis and admission having significant cultural resources, has not been recommended for an ACEC under the preferred alternative and I think that is a serious omission. Likewise in the area between Canyonlands, the National Forest, and the Dark Canyon Primitive Area.

The general impression that the draft RMP gives me is that cultural and scenic values have not been given proper priority. I would like to see specific planning actions aimed at effecting inventories, protection and enforcement of protection for the cultural resources of San Juan County. Perhaps by developing such plans it will highlight, to Congress, the need for additional funding for execution of the plans.

Thank you for the opportunity to comment.

John Paul Reeves

John Paul Reeves

RESPONSE TO COMMENT 85 — JOHN PAUL REEVES

[Comment page 1]

BLM recognizes the need to protect cultural resources (draft page 2-6). BLM is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

BLM manages scenic values under the VRM system (see draft appendix G). VRM class I areas, which afford the greatest level of protection, would increase under all alternatives considered in the draft; the preferred alternative shows a significant increase (124 percent) over current management (draft table 2-10, as revised).

In response to other comments, the areas suggested in this comment have been considered for ACEC designation in the final EIS.

The need to provide ongoing inventories is not a planning decision; neither is enforcement of legal obligations. Such concerns need not be spelled out in the RMP because they do not require land-use allocations. However, BLM recognizes these needs (see draft appendix B). BLM does not agree that specific planning decisions for inventories or legal obligations are needed in the RMP to ensure funding.

Change to the EIS? No.

COMMENT 86

October 29, 1986

Ed Scherick
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Mr. Scherick,

The comment I have regarding the San Juan RMP/EIS concerns the presentation of the alternatives. Although there are five seperate alternatives analyzed, I would describe alternatives B, C, and D as scenarios rather than true alternatives. Obviously any final plan in your district is going to be (and should be) a compromise between two sides. The development forces on one hand and the environmentalist forces arrayed against them. By presenting alternatives that don't reflect some degree of compromise you are not really presenting an alternative at all. B, C, and D are just worst-case scenarios that don't stand a chance of serious consideration. It appears that five courses of action have been described when in fact there are only two.

I think that the purpose of presenting alternatives is to provide a range of realistic responses to the identified issues. I would suggest that a more useful format would be to present alternatives B and D not as alternatives but as end-points in a range of choices and as benchmarks for the relative merits of several workable alternatives in between those extremes. I understand that this suggestion would require considerably more work on the document, but then I suppose almost all suggestions do that.

I am a resident of northern Utah who enjoys both the primitive and "tourist" recreational opportunities in the San Juan area. Thank you for the opportunity to participate in this process.

Regards,

John Paul Reeves

RESPONSE TO COMMENT 86 JOHN PAUL REEVES

[Comment page 1]

BLM is confident that the alternatives presented in the draft would provide reasonable and feasible guidance for management of public lands. They were developed to present a range of alternative ways to manage public resources in SJRA.

Change to the EIS? No.

COMMENT 87

October 30, 1986

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, UT 84535

To whom it may concern:

It has come to my attention that your office is soliciting comments on the management of the lands under your control in the San Juan Resource Area. I have spent some very enjoyable time in the area under consideration, and so I have an interest in the preservation of the characteristics of the area that attracted me in the first place.

In the guidelines under which you organization operates, there is the possibility for designating parcels as Areas of Critical Environmental Concern (ACEC). This is a powerful management tool that provides protection to these areas that are of concern to me. I strongly urge you to consider this management option for the following areas:

Canyonlands Basin: This is the area that first drew me to southeastern Utah. The scenic vistas in Canyonlands National Park (CNP) would be preserved by the ACEC designation of this area.

Beef Basin: Here again, the proximity of this area to CNP suggests that this area merits inclusion as an ACEC. Also, there are extensive archaeological ruins in this area that deserve attention, as evidenced by the recent vandalism of cultural ruins in southern Utah.

Cedar Mesa: The archaeological ruins present in this area make this area an obvious inclusion under ACEC designation.

Alkali Ridge/Hovenweep areas: I spent a period of time in this region marveling at the remnants of the ancient Indian cultures. I fear that the emphasis on energy exploration in this area will threaten those ruins that I visited in that area.

My preference under the Resource Management Plan prepared by your office would be Alternative D. This seems the best means of maintaining the integrity of the area that I so enjoy visiting. Alternative E seems to me to be poorly conceived and threatens to damage these areas to the point that my continued visits to the area would cease.

Thank you for considering my comments and I trust that your mission as stewards of our natural heritage will guide you to the proper decision.

Sincerely,

Eric Rexstad
1336 West Oak St.
Ft. Collins, CO 80521

RESPONSE TO COMMENT 87 ERIC REXSTAD

[Comment page 1]

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's nominations for specific areas are accepted. See the response to comment 2 from National Parks and Conservation Association, for a discussion of these areas.

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Change to the EIS? Yes.

COMMENT 88

October 30, 1986
6538 E. Milan Place
Denver, CO 80237

To whom it concerns

Wilderness prioritization is strongly needed for the BLM areas in Southeast Utah. The wilderness areas in Utah are some of the most scenic and spectacular areas in the continental United States. This area also has many Indian artifacts, a wonderful archeological resource that should be preserved. Many of the BLM lands in question border national parks such as Canyonlands and the Natural Bridges. These lands have a direct consequence on the National Park lands quality.

Remember that wilderness is a valuable resource. Wilderness designation should be increased.

Sincerely
Todd Robertson

RESPONSE TO COMMENT 88 TODD ROBERTSON

[Comment page 1]

Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

Regarding management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association. BLM recognizes the need to protect cultural resources (draft page 2-6) and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

Change to the EIS? No.

COMMENT 89

Dept. of Fishery and Wildlife Biology
Colorado State University
Ft. Collins, CO 80523

Mr. Ed Scherick
Manager
USDI Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, UT 84535

27 October 1986

Dear Sir,

This letter is by way of comment to the draft San Juan resource management plan. I consider myself particularly qualified to comment on both personal and professional counts. I have spent a great deal of time in this and surrounding areas in the last ten years. Speaking from a background in range/wildlife and natural resource management, I am quite concerned that the BLM has not fulfilled its mandate to manage these lands for the benefit of all users, past, present, and future.

The San Juan country contains some of the finest cultural, scenic, recreational, and wilderness values on the Colorado Plateau. The dramatic increase in visitation to these areas in recent years attests to this. I do not believe that the RMP alternatives (including the preferred) provide adequate protection for these resources. It would be a shame to disregard them in the interest of short-term economic benefits.

Cultural and archaeological resources in this area are of primary concern, as recent events have made painfully obvious. The preferred alternative is inconsistent with past BLM policy on cultural resource management, e.g. priorities identified in the 1980 Grand Gulch Plateau RMP. Positive action is needed to protect these irretrievable resources.

I feel that many areas on the San Juan Resource area should be given ACEC and/or ONA status to provide adequate protection, and best serve public interests. Comments on specific areas follow:

1) CANYONLANDS BASIN

* protect scenic values for lands visible from Canyonlands NP, and the Needles and Canyonlands overlooks, particularly Lockhart Basin and the Hatch Point Cliffs
* protect cultural values, e.g. as specified in Alts. C & D

2) BEEF BASIN

* protect scenic values for lands south of Canyonlands NP lying between the Park, Manti-La Sal NF, and the Dark Cyn. Plateau which are visible from the park

RESPONSE TO COMMENT 89 STEVE ROSENSTOCK

[Comment page 1]

The proposed RMP has identified several management prescriptions to protect cultural, scenic and recreational values in SJRA. Regarding protection of wilderness values, see the response to comment 13, Utah Wilderness Association.

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. The draft Grand Gulch Plateau Management Plan, referenced in this comment, was never finalized, and therefore does not represent "past BLM policy" as stated. See comment 9 from Southern Utah Wilderness Alliance, for a discussion on this topic.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's nominations for specific areas are accepted. See the response to comment 2, National Parks and Conservation Association, for a discussion of all areas mentioned.

BLM has dropped the ONA designation in favor of the ACEC designation.

* designate the archaeological district in Beef Basin and Fable Valley, as detailed in Alt. C
* wildlife values in this area are of particular importance, e.g. critical winter habitat for mule deer and bighorn sheep, these should be emphasized in all future management plans

3) NATURAL BRIDGES

* protect scenic values in areas adjacent to and visible from the Monument, including Woodenshoe Buttes, The Toe, and Deer Cyn

4) HOVENWEEP

* protect cultural resources integral to the entire Hovenweep area, as suggested in the 1985 NPS EA

5) GLEN CYN. NRA

* protect scenic, cultural, and natural values for all San Juan Resource Area lands that lie within NRA boundaries, in a manner consistent with NPS management

6) CEDAR MESA

* this area contains a wealth of archeaological sites, and outstanding natural and scenic values, protect the area within boundaries delineated in Alts. C & D

7) WHITE CYN. COMPLEX

* protect scenic views along the U-95 corridor, and in adjacent areas to the north, including Cheesebox, Gravel, Long, and Fortknocker Cyns.

8) MOKI-RED CYN. COMPLEX

* protect cultural values important to understanding and interpretation of pre-inundation Glen Cyn. sites, areas of importance are the upper ends of Fence, Cedar, Forgotten, and Moki Cyns, and North Gulch

9) ALKALI RIDGE

* extend ACEC boundaries consistent with 170,320 ac proposal in Alt. D to protect irreplacable Pueblo and Basketmaker village sites

10) DARK CYN. & MIDDLE POINT

* include Middle Point in the ACEC proposed in Alt. E to preserve the pristine qualities of this area

11) MANAGEMENT PRESCRIPTIONS FOR ACEC'S AND ONA'S

Meaningful protection of values in ACEC'S and ONA'S will require

RESPONSE TO COMMENT 89 STEVE ROSENSTOCK

[Comment page 2]

For potential ACECs, BLM has prepared management prescriptions that would be needed to protect the values identified as at risk (see draft appendixes A and I, as revised).

~~Change to the EIS?~~ Yes.

effective management prescriptions, some of the suggestions that follow should also apply to non-designated areas that meet designation criteria:

* restrict oil and gas leasing in areas identified as having high scenic and primitive recreation values, include lease provisions preventing surface occupancy and requiring pad revegetation

* withdraw from mineral entry, or require a Plan of Operations that demonstrates protection of cultural resources

* manage livestock so as to avoid degradation of qualities for which ONA/ACEC was established, damage to critical riparian areas in the San Juan Area warrants special attention

* range improvements and vegetation manipulation projects should not impinge on scenic, recreational and cultural resources in ONA'S and ACEC'S

* p-j treatments should include reseeding with a mix of grasses, forbs, and shrubs to enhance scenic and habitat values, Utah DWR has successfully used this approach on its lands

* manage scenic ACEC'S and ONA'S as VRM Class 1 Areas, allowing only those projects which comply with Class 1 objectives

I sincerely hope these comments will be considered in the review of the draft RMP, and preparation of the final plan. The unique and special values of this area deserve protection for the benefit of future generations. With careful planning, and active follow-up, such actions need not be incompatible with other resource uses.

Sincerely,

Steve Rosenstock

COMMENT 90

Ed Sherrick
Bureau of Land Management
San Juan Resource Area
Monticello, Utah 84535

Dear Mr. Sherrick,

Rather then repeat a lot of hard work and comments, I would like to go on record in support of the SUWA comments on the San Juan Resource Area RMP. I feel they have done a excellent and thorough job in outlining the weaknesses and strengths of the RMP. I am particularly supportive of their ACEC and ONA designations. I also feel that cultural resources should have been dealt with as planning issue. They are one of the most significant resouces in San Juan County. Thank you very much.

Sincerely,

Janet Ross

Janet Ross

RESPONSE TO COMMENT 90 JANET ROSS

[Comment page 1]

See the response to comment 9, Southern Utah Wilderness Alliance, regarding all topics mentioned here.

The opinions expressed in this comment are noted.

Change to the EIS? No.

COMMENT 91

Ward J. Roylance

Writing and Photography: The American West

Box 117
Torrey, Utah 84775

October 28, 1986

Area Manager
U. S. Bureau of Land Management
Box 7
Monticello, Utah 84535

Sir:

With regard to BLM's San Juan Resource Management Plan, now under consideration, I support -- and urge your most careful consideration of -- recommendations by the National Parks and Conservation Association for establishment of Areas of Critical Environmental Concern and Outstanding Natural Areas.

Recognizing that BLM is subject to a wide assortment of constraints and interest pressures in making land-use decisions, I would urge that a guiding principle for deciding the fate of much of the San Juan area be: "Controlled travel and recreation are the highest uses to which much of the [red-rock country] should be devoted in the future--not always to the exclusion of other uses, but certainly to the degree of making these 'highest uses' the common denominator for measuring desirability of other uses." (Quoted on page 140 of the enclosed book, which my wife and I recently published.)

My philosophy concerning the red-rock country has developed from more than 40 years exploring, studying, and writing about the red-rock country. I realize that administrators are subject to the hard realities of specific cases; nevertheless, official attitudes toward the land itself--the realization or non-realization of the scenic uniqueness of much of the red-rock country--certainly have an effect on decisions.

If you do not have time or inclination to read all of the enclosed book, may I ask your indulgence in reading the last two parts (pages 125-160)? Roland Robison told me he read the entire book, but I am sure he did not agree with my viewpoints in every respect. Thank you for your consideration.

Sincerely,

Ward Roylance

Ward J. Roylance

Encl.

RESPONSE TO COMMENT 91 — WARD J. ROYLANCE

[Comment page 1]

See the response to comment 2 from National Parks and Conservation Association regarding all topics mentioned here.

The opinions expressed in this comment are noted.

Change to the EIS? No.

COMMENT 92

MICHAEL SALAMACHA
P.O. BOX 1467
MOAB, UTAH 84532

OCTOBER 29, 1986

Ed Scherick
San Juan Resource Area Manager
BLM
Box 7, Monticello, Utah 84535

Dear Mr. Scherick:

First of all there is a need for criticism of BLM for releasing two major DEIS's in one year,(this one, and the Utah Wilderness DEIS) within months of each other. Either one of these DEIS's is too large to comprehend and comment on in any informed way in the time allotted for each. When let loose in the same year and only months apart it is mind-boggling work attempting to understand the bureaucratic jargon with its array of acronyms which do not always make much sense, even once the words are unveiled that they stand for.

It would make me and many of the other people commenting on these plans very happy if you could spend some time trying to simplify your statistics, abbreviations, plans within plans, systems, etc. into plainer English, so we might all know what it is you are getting at.

On page 1-9 it is stated in the DEIS; "At Section 302(b), FLPMA requires the Secretary to manage the public lands so as to prevent unnecessary or undue degradation of the lands." If this is true as far as I can see, none of the alternatives are adequate in living up to the law and in so doing protect the land. None of the alternatives are adequate for protecting the resource and alleviating current and planned abuses by the private sector, and the BLM itself.

One of the more blatent (of many) abuses is the traditional one of grazing (either cattle or sheep). Nowhere do I see it mentioned in any alternative that grazing should be eliminated in deference to wildlife or natural ecosystems except for a few piddling instances where cattle are not found anyway, i.e., Bridger Jack Mesa and other smaller areas. And the most amazing thing I find in the alternatives is that Alternative D, supposedly emphasizing natural ecosystems, calls for no grazing on a mere 11,760 acres (pg.S-9, fig. S-3), while Alternative C, with emphasis on recreation, calls for 75,560 acres to be ungrazed (pg. S-7, fig. S-2). Finally BLM throws in the monkey wrench in your preferred alternative, E, calling for no grazing on 138,120 acres (pg. S-11, fig. S-4). Can this be logically explained? Since it is fairly obvious that BLM's preferences are not preservation or protection of natural ecosystems, why are you showing your preferred plan with much less grazing on it (126,360 more acres than Alt. D) than the alternative which emphasizes natural ecosystems?

What is hardest to digest in the plan is the continued abuse of the land in the San Juan Resource Area due to grazing. And there is not any end in sight. It is costing the BLM and the American Public more to have these beasts on the land than will ever be returned to us in revenue collected from the permittees that continue to degrade it. And even more ridiculous is the fact that BLM

RESPONSE TO COMMENT 92 MICHAEL SALAMACHA

[Comment page 1]

BLM acknowledges that the draft RMP/EIS is a complex document covering a complex area. A list of acronyms and a glossary were included in the draft to assist the reader.

Each alternative in the draft shows some acreage excluded from grazing (draft table 2-7); this varies from 29,060 acres to 155,420 acres depending on the alternative. Under every alternative except B, 17,300 acres were allotted to wildlife and would therefore be ungrazed by livestock.

Grazing was excluded from more acreage in alternative C than in D because grazing was thought to be more incompatible with the goal of alternative C (maximizing recreational use and increasing wildlife populations) than with that of alternative D (preserving natural ecosystems) (draft page 2-13). The main difference between the exclusions under the two alternatives was the exclusion of grazing from mesa tops in bighorn sheep crucial habitat (draft figure 3-11) under alternative C.

Under alternative D, the level of grazing that would be allowed was reduced (draft table 2-7), although the acreage available for grazing was greater. In this alternative, a reduced level of grazing was considered compatible with maintaining natural ecosystems. Over the majority of SJRA, the level of grazing was reduced to 25 percent of the current situation (5-year average licensed use).

Alternative E presents a mix of the other alternatives and includes some management actions which were not included in (but were derived from) the other alternatives. As noted in this comment, grazing is excluded from more acres under alternative E than under any other alternative. This was done because of the need to protect other resource values.

Grazing use of public lands is authorized under the Taylor Grazing Act and FLPMA, and will be allowed to continue within the parameters of BLM's multiple-use mandate.

is promoting this misuse of our land with schemes and dreams of giant land "treatments" chaining thousands of acres of climax pinyon juniper forest so some useless cows can graze on exotic crested wheat grass. Is this managing the "public lands so as to prevent unnecessary or undue degradation..."?

I mourn not so much the monetary value that the BLM and its wards, the permittees, is cheating the public out of, but the loss of the integrity of the natural ecosystem they continue to manipulate to their own ends. By looking at Appendix O (Grazing Allotment Summary) anyone can see that the majority of the allotments are in poor shape. It is time that the BLM charged more realistic fees, and eliminated grazing on marginal land, which most of this area is. We do not need to continue living the myth that Hollywood made us believe. The land has more purpose and more of its own right than to be continuously stomped on by these slow moving bovines and their well matched herders (cowboys?).

Other points that need emphasis are:

1) BLM should give priority to the protection of wilderness, scenic, and recreational values in the San Juan Resource Area, especially in the areas BLM identifies as "primitive," "semiprimitive nonmotorized," and "semiprimitive motorized."

2) BLM must let Congress decide which WSAs should be designated as Wilderness and which WSAs will fall by the wayside--not as is being presently attempted in the Utah Wilderness DEIS whereby BLM is attempting to tell Congress which WSAs the BLM feels are worthy. I would like to know what the status of the WSAs not chosen by the BLM for further study by Congress is once the final EIS is written.

3) BLM should manage all lands adjacent to the National Park units in the area (CANYONLANDS, HOVENWEEP, NATURAL BRIDGES, GLEN CANYON NAT'L REC. AREA) to fully protect all park values, especially when we realize that if the parks had more natural boundaries instead of the arbitrary political lines drawn on the map at present much of BLM land would be within those park boundaries.

4) The BLM needs to expend as much time and energy protecting cultural (archeological) resources as it expends in comparison on grazing or mining. Much more should be done to protect the archeology and educate the public as to its importance--starting in the local schools of San Juan County.

5) A study done in 1976 by several agencies in conjunction with the BLM entitled "U-95 Corridor Study" is never mentioned in the DEIS. All the time and money expended on this study should not be wasted and lost in the shuffle. Its conclusions should be used by the BLM as the basis for establishing an ACEC for Scenic Quality along Highways U-95, U-261, and U-263. White Canyon and its tributaries should be included as part of the ACEC for both Scenic Values and Recreational Values. This includes: Long Canyon, Short Canyon, Fortknocker Canyon, Gravel Canyon, Cheesebox Canyon, Hideout Canyon, K&L Canyon, and Deer Canyon.

I would like all these comments included as input on the San Juan RA DEIS, with additional individual comments to follow seperately.

Sincerely,

Michael Salamacha

RESPONSE TO COMMENT 92 MICHAEL SALAMACHA

[Comment page 2]

Range improvements funded by BLM are analyzed to determine cost effectiveness before they are approved; they are not arbitrarily allowed. The draft shows areas physically suitable for land treatments, not proposed projects.

Since BLM manages public resources for multiple-use, ecosystems are managed to accommodate the demands of the various land uses. Most uses involve human intervention and are incongruous with maintaining an undisturbed ecosystem.

Many of SJRA's grazing allotments are in category I (draft page 3-54 and appendix O). The I category does not necessarily indicate poor range condition (draft appendix D). (See the response to comment 3, National Wildlife Federation, comment page 8.)

The RMP cannot change public-land grazing fees, which are established by Congress or by the President through an executive order. The Public Rangelands Improvement Act gave a formula for grazing fees to be charged on public rangelands through 1985. On February 14, 1986, Executive Order 12548 established the grazing fees for 1986. Grazing fees have been under study for several years; the current fee could change if Congress so chooses.

Most of the land in SJRA is not considered marginal for grazing (draft appendix T). Stocking rates on some allotments may need to be adjusted, but adjustments based on range condition can be made only on the basis of adequate monitoring data (draft page 2-6, appendixes B and J).

In response to specific points raised in this comment:

1) The RMP/EIS does not provide for wilderness management (draft page 1-2). BLM is confident that the preferred alternative gives priority to protection of scenic and recreational values where needed.

2) FLPMA requires BLM to assess the suitability of WSAs for wilderness. Regardless of recommendations in the wilderness EIS, WSAs and ISAs remain under wilderness review until designated as wilderness or released by Congress (draft RMP/EIS page 1-2).

3) Congress has determined that NPS units are to be managed under NPS laws, and that adjacent public lands are to be managed under FLPMA and other public land laws. See the response to comment 2, National Parks and Conservation Association.

4) BLM agrees that education is a valuable tool.

5) BLM used the U-95 corridor study when preparing both the WSA and the draft (page 3-81), but the reference was omitted (see revisions to draft page 3-81). Based on other comments, the White Canyon area and the U-95 scenic corridor have been considered for ACEC potential in the final EIS (see revisions to draft chapter 2 and appendix I).

Change to the EIS? No.

COMMENT 93

TO: Bureau of Land Management,
San Juan Resource Area
PO Box 7
Monticello, Utah 84535

Dear BLM:

The San Juan Resource Management Plan (SJRMP) has potential to protect Southeast Utah's outstanding cultural, scenic, recreational and wilderness values. The integrity of areas like Grand Gulch, Dark Canyon, Beef Basin and the lands surrounding Canyonlands, Hovenweep and Natural Bridges are threatened by oil and gas leasing and ORV use.

The Federal Land Policy and Management Act (FLPMA) requires that priority be given to areas designated as ACECs (Areas of Critical Environmental Concern). FLPMA defines ACECs as "areas within the public lands where special management attention is required . . . to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes . . .".

I urge you to designate the following areas as ACECs:

I. Canyonlands Basin

To protect scenic values for all lands in the Canyonlands Basin which are visible from the National Park or BLM's Needles and Canyonlands overlooks. Scenic views are integral to visitor enjoyment.
To protect cultural values between Hart's Draw and the park boundary.

II. Beef Basin

To protect the scenic continuity of the Manti-La Sal National Forest and the Dark Canyon Plateau which are visible from the National Park. This area also has outstanding cultural history and archaeological research potential.

III. Cedar Mesa

To protect cultural, scenic, and natural values. I propose boundaries consistent with the archaeological district proposed for designation under alternatives C & D. Cultural resources are significant in this area because of the wealth of undisturbed Basket-Maker and Pueblo sites. This area also provides habitat for Bighorn sheep and various protected Raptors.

RESPONSE TO COMMENT 93 DAVID C. SALTZ

[Comment page 1]

The proposed RMP has identified several management prescriptions to protect cultural, scenic, and recreational values in SJRA. Regarding protection of wilderness values, see the response to comment 13 from Utah Wilderness Association.

BLM has no field data to support the statement made in this comment that the areas referenced are all threatened by oil and gas leasing and ORV use; in fact, many of these areas are currently closed to mineral leasing and ORV use (draft chapter 3).

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's nominations for specific areas are accepted. See the response to comment 2, National Parks and Conservation Association, for a discussion of all areas mentioned.

IV. Alkali Ridge/Hovenweep areas

The ACEC proposed under alternative D will protect the Alkali Ridge areas high density of cultural sites from energy exploration, development and vandalism. I support a 2,000 acre ACEC to protect the Hovenweep area which has superior cultural and scenic values.

V. Natural Bridges

I support an ACEC to protect scenic values important to visitor enjoyment. The boundary should include Harmony Flat (southeast of the Monument) and the lands between the Monument and the National Forest. This area should include Woodenshoe Buttes, The Toe, and Deer Canyon.

VI. Glen Canyon National Recreation Area

I support an ACEC to protect scenic, natural, cultural and wildlife values for all lands in the San Juan Resource Area that lie within Glen Canyon National Recreation Area.

VII. White Canyon Complex

I support an ACEC to protect scenic and cultural values for the area north of Utah 95 and south of the Dark Canyon Plateau and the Manti-La Sal National Forest. This includes Cheesebox, Gravel, Long, Fortknocker canyons and landmarks such as Jacob's Chair. Protection is important to preserve scenic views from U-95 and to preserve undisturbed cultural sites.

VIII. Moki-Red Canyon Complex

I support an ACEC to protect cultural values in these areas. Boundary should include the upper ends of Red, Cedar, Forgotten and Moki Canyons, North Gulch and Upper Lake Canyon. Cultural resources are important to the understanding and interpretation of cultural data collected before Glen Canyon was flooded.

IX. Dark Canyon and Middle Point

I support an ACEC to protect the scenic, natural and cultural values provided by the pristine character of these areas.

These areas should all be designated as "Outstanding Natural Areas" (ONA's) because of their unusual natural characteristics that need management protection.

Please establish management prescriptions which provide meaningful protection for ACEC's and ONA's and the values they were established to protect.

The preferred alternative E will result in damage to about 15,678 cultural sites. I feel the BLM has failed to adequately address the protection of cultural resources in the RMP. Please amend or supplement the SJRMP to identify special management actions to protect these values.

The development of a "Cultural Resource Plan" will help highlight to Congress the need for additional funding for cultural resources management in the San Juan Area!!!

Thank you for your help and cooperation.

David C. Saltz

RESPONSE TO COMMENT 93 DAVID C. SALTZ

[Comment page 3]

BLM has dropped the ONA designation in favor of the ACEC designation.

For potential ACECs, BLM has prepared management prescriptions that would be needed to protect values identified as at risk (see draft appendixes B and I, as revised).

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for or against any alternative presented in the draft.

BLM recognizes the need to protect cultural resources (draft page 2-6) and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The draft identified areas where specific CRMPs would be developed (draft page 2-6 and table 2-7); these would be the activity plans prepared after the RMP (draft pages 2-1 and A-29). Congress appears to be aware of the situation regarding cultural resource management.

Change to the EIS? Yes.

COMMENT 94

Geological Consultant

Well Log Analyst

JOHN W. SANDERS
385 HIGHLAND HILL DRIVE, DURANGO, CO 81301
TEL: 303-259-0841

24 July 1986

Ed Scherick, Manager
San Juan Resource Area
Bureau of Land Management
P. O. Box 7
Monticello, Utah 84535

Dear Mr Scherick:

After closely scrutinizing your Draft San Juan Resource Management Plan Environmental Impact Statement, I wish to voice my support for the Alternative D for the areas discussed in the text. I feel that the public lands in the area under study, because of their unique scenic, water quality and cultural resource values, merit the maximum amount of possible protection by the Bureau of Land Management.

I realize that Alternative D would virtually eliminate mining and oil and gas exploration and development over a large portion of San Juan County, and would greatly restrict ORV use and grazing. I also realize that this alternative would to some extent reduce the tax base of the area and would be relatively expensive to implement. In other words, local people of our generation (including myself, a petroleum geologist who has to some degree depended in the past upon work in San Juan County) may have to make significant short-term sacrifices so as to better preserve the character of the area concerned for United States citizens as a whole and for future generations.

I am particularly familiar with a number of the Wilderness Study Areas, including Grand Gulch, Butler Wash, Bullet Canyon, Road

RESPONSE TO COMMENT 94 JOHN W. SANDERS

[Comment page 1]

BLM appreciates the comments regarding alternative D, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

The proposed RMP has identified several management prescriptions to protect scenic, watershed, and cultural values in SJRA.

Canyon, Slickhorn Canyon, Fish-Owl Creek Canyons, Mule Canyon, Shieks Flat, Squaw Canyon, and Cross Canyon, and am highly impressed by their outstanding qualities. Rich in archaeological sites and in scenic grandeur, a special effort should be made to preserve these canyons and mesas as they are today for our children and grandchildren. Oil, gas, uranium ore, potash and timber are at best of marginal values in those areas, and their use for grazing would only benefit a handful of ranchers, whereas their importance to the future population of America is incalculable.

Sincerely yours,

John Sanders

John W. Sanders

RESPONSE TO COMMENT 94 JOHN W. SANDERS

[Comment page 2]

Regarding protection of wilderness values, see the response to comment 13, Utah Wilderness Association.

Change to the EIS? No.

COMMENT 95

Geological Consultant

Well Log Analyst

JOHN W. SANDERS
385 HIGHLAND HILL DRIVE, DURANGO, CO 81301
TEL: 303-259-0841

30 October 1987

Mr Ed Scherick
Bureau of Land Managemen
P. O. Box 7
Monticello, Utah 84535

Dear Mr Scherick:

I have reviewed your Resource Management Plan for the San Juan Resource Area, and wish to express my support for Alternative D for all study areas. I do not feel that the other alternatives provide adequate protection for areas so rich in cultural resources, recreational benefits and beauty. Although portions of the wilderness areas involved in the study have certain economic benefits, I feel that such marginal commercial values will benefit only a small handful of individuals, and I believe the greater benefit is to preserve and protect these invaluable natural and cultural resources for the benefit of Americans as a whole, both those of today and of tomorrow. Please don't sacrifice irreplaceable wilderness for the benefit of a few mining and oil companies, ranchers and ORV fans — we can't afford to lose these wonderful natural features for someone's short-term gain.

Yours sincerely,

John Sanders

John Sanders

RESPONSE TO COMMENT 95 JOHN W. SANDERS

[Comment page 1]

The draft (page 1-2) discusses management of WSAs and ISAs if released from wilderness review by Congress. It is assumed that areas released from wilderness review are to be managed for nonwilderness purposes. Therefore, no attempt was made through the RMP to analyze impacts to wilderness values.

BLM appreciates this comment regarding alternative D, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

Change to the EIS? No.

COMMENT 96

1001 Mapleton Avenue
Boulder, CO 80302

October 24, 1986

Ed Scherick
Manager
San Juan Resource Area
BLM, P.O. Box 7
Monticello, UT 84535

Dear Mr. Scherick,

I would like to encourage you, as manager of the San Juan Resource Area, to increase your concern for management of sensitive primitive areas in SJRA. Since I moved to Santa Fe over 15 years ago, I have used this area for recreation many, many times. As you know so well, these wild lands look so far from human civilization, but it takes such little use to leave a noticable and enduring impact on the fragile ecosystems. I have seen evidence of off-road vehicles and destruction of the vegetation for firewood and so on.

I have watched as the BLM has become one of the more sensitive and conscious of our land managing federal agencies. Where a while back, people used to vilify the BLM for their management, now many people are happy to see resources in your purview. As you must know, more and more people want to use land resources in a non-comsumptive way, for primitive recreation. There is certainly plenty of tourist development in the desert and forest now.

I ask you please to keep the options open for primitive recreation, not only for now, but for the future as well. Please use Areas of Critical Environmental Concern and Special Recreation Management Areas, as well as very careful protective management and monitoring policies, to keep these very rare and loved areas in the San Juan area as they are now, without any degradation. There are many of us who love to hike here, and sleep under the stars, far from our ORV's.

Thank you for your consideration.

Sincerely,

Melissa Savage

Melissa Savage

RESPONSE TO COMMENT 96 MELISSA SAVAGE

[Comment page 1]

BLM agrees that SJRA contains appreciable natural resource values. The proposed RMP provides management to protect primitive and semiprimitive recreational values (see revisions to draft appendix A).

The proposed RMP provides for designation of several areas as ACECs and SRMAs (see revisions to draft chapter 2 and appendix A). For potential ACECS, BLM has prepared management prescriptions that would be needed to protect values identified as at risk (see draft appendixes A and I, as revised).

Change to the EIS? No.

COMMENT 97

September 28, 1986

Mr. Ed Scherick, Area Manager
San Juan Resource Area
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Dear Ed,

I would like to nominate the Valley of the Gods in Southern San Juan County as an Area of Critical Environmental Concern for Visual Quality. This area is nationally advertised by the State of Utah and San Juan County for its scenic values and deserves to be designated as an ACEC (see enclosures). My proposal is bounded by U261, US163, and the Cedar Mesa cliffline (see map).

The present VRM classification of this area does not recognize the outstanding scenic values that are present so it should be revised. The existing Scenic Quality rating of the Valley of the Gods is Class C which is obviously incorrect-the proper rating is Class A.

The San Juan Resource Area Resource Management Plan should be revised to include the Valley of the Gods as an ACEC for Visual Quality.

Sincerely,

Owen Severance

Owen Severance
P.O. Box 1015
Monticello, Utah
84535

RESPONSE TO COMMENT 97 OWEN SEVERANCE

[Comment page 1]

BLM accepts this nomination of Valley of the Gods for ACEC designation. The draft has been revised to consider Valley of the Gods as an ACEC under alternative D and as a special emphasis area within the Cedar Mesa ACEC under alternative E (see revisions to draft summary, chapters 2, 3, and 4, and appendixes A, H, and I).

The secenic quality rating for Valley of the Gods has been reviewed and amended to class B. This reclassification in turn caused the VRM class to be upgraded from III to II (see revisions to draft table 3-14, figure 3-18, and pages 4-43, 4-57, and 4-71).

NOTE: A map unsuitable for reproduction was included with this comment letter; it has not been reprinted.

Change to the EIS? Yes.

COMMENT 98

October 6, 1986

Mr. Ed Scherick, Area Manager
San Juan Resource Area
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Dear Ed,

The Draft RMP for the San Juan Resource Area for some unexplained reason does not mention the "U-95 Corridor Study" that was prepared in 1976 with the BLM as Lead Agency. This document is a well researched and well thought out cooperative effort of many agencies and individuals. Its findings should be used by the BLM as the rationale for establishing an ACEC for Scenic Quality along highways U-95, U-261, and U-263. The "Study Findings" on pp. 5,6 state: "Preservation of the visual corridor is a vital issue in consideration of any use, management, or development scheme for the area. Picturesque views of a natural canyonlands landscape are continuous along the highways. Visual elements within the corridor and the vistas beyond are threatened if uncontrolled or ill-planned development encroaches." This recognition by the BLM of the outstanding scenic values along these highways is more than adequate reason to establish an ACEC for Scenic Quality. White Canyon and its tributaries should be included as part of the ACEC for both Scenic Values and Recreation Values. Long Canyon, Short Canyon, Fortknocker Canyon, Gravel Canyon, Cheesebox Canyon, Hideout Canyon, K&L Canyon, and Deer Canyon, all tributaries of White Canyon, are an important part of the proposed ACEC. Hiking, photography and backpacking are some of the outstanding recreation values they provide.

The boundaries of the ACEC should be determined from the "U-95 Corridor Study" to include all of the "visual corridor" (p. 6) and as much of the "unobstructed view area" (p. 6) as possible along with all of the White Canyon drainage that is in the Cedar Mesa Sandstone.

I hope the BLM will include this proposed ACEC as part of the Final RMP. The "U-95 Corridor Study" documents the need for it.

Sincerely,

Owen Severance

Owen Severance
P.O. Box 1015
Monticello, Utah
84535

RESPONSE TO COMMENT 98 OWEN SEVERANCE

[Comment page 1]

BLM accepts this nomination of the U-95 scenic corridor for ACEC designation. BLM agrees that, based on the U-95 corridor study, the area qualifies for consideration as an ACEC. The draft has been revised to consider the Scenic Highway Corridor ACEC under alternative D and a slightly modified corridor for ACEC designation under alternative E. The White Canyon viewshed has also been considered in the draft as an ACEC under alternative D, and as part of the Scenic Highway Corridor ACEC under alternative E (see revisions to draft summary, chapters 2, 3, and 4, and appendixes A, H, and I). (See also the response to comment 9, Southern Utah Wilderness Alliance, on these two proposals.)

BLM was aware of the U-95 corridor study, and used it when preparing both the MSA and the draft for this project. The U-95 corridor study was discussed on draft page 3-81, but the title and reference for the document were inadvertently omitted from the narrative. The text has been revised to include the study findings as suggested in this comment (see revisions to draft page 3-81).

To protect the area's environmental sensitivity, the draft did not propose to designate a transportation and utility corridor along U-95 or the other highways mentioned in the corridor study (see draft page 2-65, as revised). This means that construction of any additional transportation or utility systems within the highway corridor would not have been allowed. However, upon review BLM agrees that the corridor would benefit from the additional protection afforded by ACEC designation.

Change to the EIS? Yes.

COMMENT 99

October 20, 1986

Mr. Ed Scherick, Area Manager
San Juan Resource Area
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Dear Ed,

In the draft RMP, under Alternative E, Arch Canyon is not recommended as either an ACEC or ONA. While Alternative D does show Arch Canyon as a possible ONA, it apparently was not seriously considered for the preferred alternative. I'm still trying to decide whether the BLM is being short-sighted or far-sighted by this omission. If, by ignoring this spectacular canyon in the preferred alternative, the BLM thinks no one will notice, then it is a short-sighted omission. However, if the BLM realizes that by not giving Arch Canyon any special management designation Congress will be forced to make it a Wilderness Area, then the BLM is being far-sighted. Throughout the Wilderness Study Process it has been a very controversial area because of the BLM decision to drop it from wilderness consideration during the Inventory stage in spite of its obvious wilderness values. Anyone who has seen Arch Canyon from either the canyon rim or from the streambed will agree that its scenic, recreation, and cultural resource values are outstanding. It has been given a Class A Scenic Quality rating, so the BLM can't claim ignorance of its scenic values. This canyon has long been recognized by the public for its hiking and recreation values as well as the "world class" scenic views from the rim. The RMP should recognize these outstanding values by designating Arch Canyon as either an ONA or an ACEC for scenic, recreation, and cultural resource values.

Sincerely,

Owen Severance

Owen Severance
P.O. Box 1015
Monticello, Utah
84535

RESPONSE TO COMMENT 99 — OWEN SEVERANCE

[Comment page 1]

BLM has considered this nomination for ACEC designation, but does not find that the area meets ACEC criteria. Under BLM Manual 8410, Visual Resource Inventory, an area must meet two criteria for identification as a candidate potential ACEC for scenic values. It must be: (1) scenic quality A; and (2) unique or very rare within its physiographic province. Arch Canyon meets the first criterion, but not the second, as it is similar to other nearby canyons (for example, Mule, Fish, or Owl).

This comment references cultural values in Arch Canyon. BLM is aware that significant archaeological resources exist in this area, but does not agree that these values are relatively important, significant, or "at risk."

BLM analyzed the impact of designating Arch Canyon as an ONA under alternative D (see draft table 2-6 and chapter 4, both as revised). BLM found that no value would be gained by making this designation.

BLM does not believe this comment has supported the recommendation that Arch Canyon, on its own merits, qualifies to be designated as an ONA or ACEC. However, Arch Canyon falls within the Cedar Mesa proposed ACEC analyzed in the proposed RMP and final EIS under alternatives D and E in response to another comment (see response to comment 2, National Parks and Conservation Association; see also revisions to draft summary, chapters 2, 3, and 4, and appendixes A, H, and I.)

Change to the EIS? No.

COMMENT 100

October 29, 1986

Mr. Ed Scherick, Area Manager
San Juan Resource Area
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Dear Ed,

I would like to nominate Comb Ridge as an ACEC for Visual and Cultural Resource values. The proposed boundary for the ACEC is shown on the enclosed map.

Due to the many short drainages formed in the downslope of the Navajo sandstone, the East side of Comb Ridge contains a large number of archaeological sites, including many important rock art sites. Both sides of Comb Ridge are spectacular from a visual standpoint. The 20 mile long West escarpment is a unique visual resource. Most of it can be seen from highways U-95 and US-163. The highly eroded east side is accessible from the Butler Wash road.

While the East side of Comb Ridge has a Class A Scenic Quality rating, the West side escarpment is inexplicably given a Class B Scenic Quality rating. I can't understand this downgrading of the scenic quality since Comb Ridge is a unique geologic structure-it obviously deserves a Class A Scenic Quality rating.

All of Comb Ridge should be designated an ACEC for both Visual and Cultural Resource values. The RMP should include this proposed ACEC in the Preferred Alternative.

Sincerely,

Owen Severance

Owen Severance
P.O. Box 1015
Monticello, Utah
84535

RESPONSE TO COMMENT 100 OWEN SEVERANCE

[Comment page 1]

This comment nominates Comb Ridge as an ACEC based on cultural and scenic values.

By itself, the Comb Ridge area was not found to warrant consideration as an ACEC for cultural values, but BLM has considered it as part of the potential Cedar Mesa ACEC analyzed under alternative D in the proposed RMP and final EIS (see revisions to the draft, summary, chapters 2, 3, and 4, and appendixes A, H and I).

Under BLM Manual 8410, Visual Resource Inventory, an area must meet two criteria for identification as a candidate potential ACEC for scenic values. It must be: (1) scenic quality A; and (2) unique or very rare within its physiographic province. Comb Ridge meets the first criterion, but not the second, as it is similar to the Cockscomb.

As noted in this comment, the west escarpment of Comb Ridge has been evaluated as having class B scenery. Class B scenery is that which contains some outstanding features and some fairly common to the physiographic region. The west side of Comb Ridge scored "high" in the rating factors of landform and uniqueness; "low" in presence of water and diversity of vegetation; and "moderate" in color and intrusions. All of these factors, when scored, combined to produce class B scenery. The fact that Comb Ridge is a relatively unique geologic feature is not sufficient to produce a class A scenery rating; the rating must come from a combination of all six rating factors.

While it is true that Comb Ridge contains many significant cultural resources, it does not differ significantly from the remainder of SJRA. The majority of sites in Comb Ridge are dry caves which have been severely vandalized in the past. BLM does not believe that the ridge warrants consideration as a potential ACEC based on its own merits.

However, as noted, Comb Ridge is part of the potential Cedar Mesa ACEC analyzed in the proposed RMP and final EIS under alternative D. This corresponds with the proposed Grand Gulch Plateau SRMA and the proposed Cedar Mesa Archaeologic District (draft figure 2-11). Included as part of an archaeologic district, cultural resource sites would be protected from other surface uses (draft pages 2-6 and A-27).

NOTE: A map unsuitable for reproduction was included with this comment letter; it has not been reprinted.

Change to the EIS? Yes.

COMMENT 101

October 31, 1986

Mr. Ed Scherick, Area Manager
San Juan Resource Area
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Dear Ed,

Please include these comments in the record for the San Juan Resource Area draft Resource Management Plan.

I am extremely disappointed in all of the alternatives presented in the Plan and especially in Alternative E, the Preferred Alternative. As stated in the Draft RMP, the San Juan Resource Area contains some of the most spectacular scenic resources as well as some of the most important cultural resource areas in the United States, yet the Draft RMP ignores many of these areas. Alternative E proposes only five ACECs! Even if all of the ACECs considered in the Draft RMP were included in Alternative E, many significant areas deserving ACEC status would be left out. The following is a list of potential ACECs that should be included in the preferred alternative:

1) Valley of the Gods-Visual Quality (see my letter of 9/28/86).
2) U-95 Scenic Corridor and White Canyon-Visual Quality and Recreation Values (see my letter of 10/6/86).
3) Arch Canyon-Visual Quality, Cultural Resources, and Recreation Values (see my letter of 10/20/86).
4) Comb Ridge-Visual Quality and Cultural Resources (see my letter of 10/29/86).
5) Cedar Mesa-Cultural Resources, Visual Quality, and Recreation Values. The ACEC should include all of the areas designated in Alternative E as National Register Properties (8) Butler Wash, (9) Grand Gulch, and (10) Cedar Mesa (p.2-39).
6) Dark Canyon and Middle Point-Scenic, Natural, and Cultural Resource Values. The ACEC should include Middle Point as part of the Dark Canyon ACEC proposed in Alternative E.
7) Lockhart Basin-Visual Quality and Recreation Values. The ACEC boundary should be as shown in Alternative C on p.2-25.
8) North Abajo-Cultural Resources. The ACEC boundary should be as shown in Alternative C on p.2-25.
9) Alkali Ridge-Cultural Resources. The ACEC boundary should be as shown in Alternative C on p.2-25, not the smaller area proposed in Alternative E.
10) Hovenweep-Cultural Resources. The ACEC boundary should be as shown in Alternative D on p.2-27.

RESPONSE TO COMMENT 101 OWEN SEVERANCE

[Comment page 1]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for or against any alternative presented in the draft.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). The management provisions in appendix A are believed adequate to manage surface disturbance in SJRA.

To qualify for consideration as a potential ACEC, an area must meet the criteria given in BLM manual section 1617.8; at a minimum, an area must meet the two criteria of relevance and importance.

To qualify for consideration as a potential ACEC to protect scenic values, an area must meet additional criteria. Under BLM manual 8410, Visual Resource Inventory, an area must meet two criteria to be considered as a potential ACEC for scenic values. It must be (1) scenic quality A; and (2) unique or very rare within its physiographic province.

The commentor references four areas he has nominated for ACEC designation in other letters. For a discussion of Valley of the Gods, see the response to comment 97; for U-95 scenic corridor, response to comment 98; for Arch Canyon, response to comment 99; for Comb Ridge, response to comment 100. This comment mentions several other areas as qualifying for ACEC designation, but offers no background information; however, these areas have also been nominated by other commentors (see the response to comment 2, National Parks and Conservation Association).

I am amazed that Alternative E does not include any ONA designations. The San Juan Resource Area contains some of the best hiking areas on the Colorado Plateau as well as other outstanding areas that are being heavily used be "recreationists". All of the potential ONAs shown in Alternative D on p.2-27 should be included in the preferred alternative along with the following:
1) The Beef Basin SRMA as shown in Alternative C on p.2-35.
2) The Mancos Mesa WSA
The following Class A Scenic Quality Areas:
3) Mule Canyon between U-95 and Comb Wash.
4) The White Canyon Drainage including all of the tributaries.
5) The Lockhart Basin ACEC as shown in Alternative D on p.2-27.

These ACECs and ONAs should have the following restrictions:
a) They should either be closed to oil and gas leasing or have "no surface occupancy" restrictions.
b) They should be withdrawn from mineral entry.
c) ORV use should be limited to designated roads.
d) They should be excluded from land treatments, range improvements, and vegetative manipulation.
e) They should be managed as VRM Class I.

I support the designation of RNAs for Lavender and Bridger Jack Mesas as proposed in Alternative E. The BLM should look for other areas that might be eligible for RNA designation.

Alternative E does not provide a "balance" because the land available for potential land treatment goes from 21,000 acres in Alternative A to 241,960 acres in Alternative E-a more than ten-fold increase. Much of this land is on Cedar Mesa where recreation use and cultural resource protection are much higher uses for the land. By classifying this land for potential land treatment, the BLM is promoting single use (grazing) over multiple use. It would appear to be a plan to eliminate pinyon and juniper trees on any land that can grow exotic grasses. The existing chained areas should be maintained where there is no conflict with other uses of the land. No new areas should be converted to grazing land. Therefore, the "Potential Land Treatment" map in Alternative E should only show areas that have had "treatment" in the past. The "Natural Succession Areas" as shown in Alternative D (p.2-17) were not included in any form in Alternative E. They should be included in a modified form as part of the management prescription for Alternative E. The impacts on wildlife under Alternative E are unacceptable. No livestock use or range improvements should be allowed in crucial wildlife habitat areas (pp.4-66,67). The statement on p.3-81 that "roads, oil and gas developments, and seismic activities probably have had the most significant adverse impact on the visual qualities of the area" is not correct. Chaining on both State and BLM land has had the "most significant adverse impact on the visual qualities of the area" and has generated the largest number of negative comments from the public. The statement that follows, "The capability of the SJRA to absorb these impacts is fairly high where developments are infrequent, and low in areas of concentrated development where scenic qualities are substantially

RESPONSE TO COMMENT 101 OWEN SEVERANCE

[Comment page 2]

BLM considered the ONA designation under alternatives C and D, but did not find any benefit that would warrant this designation. Since the draft was published, BLM has dropped the ONA designation in favor of the ACEC designation.

BLM has prepared management prescriptions for potential ACECs that would be needed to protect values identified at risk (draft appendixes A and I, as revised). IBLA directed (76 IBLA 395 (1983)) that the level of management imposed on an are should be the minimum level needed.

BLM appreciates this support for the RNA designation proposed for Bridger Jack and Lavender Mesas in the draft (table 2-6). In the proposed RMP, because of a shift in BLM policy, the areas would be designated as ACECs rather than RNAs (see revisions to draft table 2-7, page 2-68, and appendix H). However, management goals would be the same as indicated in the draft for the RNAs.

This comment states that BLM should look for other areas qualifying for RNA designation. When preparing the MSA, BLM reviewed resource values throughout SJRA to determine whether any areas would qualify for the RNA designation; these were the only two areas identified by either BLM staff or the public. If other areas are thought to be suitable for special designation for similar reasons, they could be nominated by the public at any time.

Grazing use of public lands is authorized under the Taylor Grazing Act and FLPMA, and will be allowed to continue within the parameters of BLM's multiple-use mandate. BLM believes that allowing land treatments on Cedar Mesa is reasonable. Land treatments are a standard part of grazing management. Prohibiting grazing uses, as suggested in this comment, could also be construed as not providing for a balanced use of public rangelands. The potential land treatments shown are physically suitable areas, not proposed projects. The draft is revised to clarify this, and to indicate that priority would be given to maintaining existing land treatments (see revisions to draft pages 2-6 and 2-68). Under the proposed RMP, the special conditions for the proposed ACECs would have to be met. At the time that a specific project is proposed, NEPA documentation would assess impacts to other resources, including cultural resources, and provide for mitigation of adverse impacts (draft pages 2-1, A-1, and A-29).

The natural succession areas under alternative D were not carried forward because the adverse impacts were believed to outweigh the benefits (draft chapter 4). Modified natural succession concepts could be applied to selected areas; for example, sensitive areas can be excluded from land treatments or grazing. In response to this comment and others that were similar, figure 2-15 has been revised to eliminate potential land treatments on the mesa tops within the crucial bighorn sheep habitat (draft figure 3-11).

BLM agrees that chainings can affect visual resources. No new chainings have been done on public land in SJRA since 1972 (draft page 3-58); the appearance of 20- to 25-year-old chainings is natural enough that many people believe these areas should qualify for wilderness designation (see the draft statewide wilderness EIS). Under current management practices, visual resources would be taken into account during the project design stages of any new land treatments (draft page A-6).

reduced" is self-serving bureaucratic bullshit. With the ever increasing use of San Juan County by tourists, backpackers and other recreationists, no part of the SJRA can be sacrificed to mindless developments of any kind. All of the abandoned seismic lines, drill pads, and other "temporary" impacts should be reclaimed. No new chaining should be done.

The following are miscellaneous comments about the Draft RMP:

How can Alternative E claim to be "balanced" when Table S-1 shows that no acreage in the SJRA will be closed to permits and leasing?

On p.1-10 is the statement "At least least one of the alternatives assessed in the RMP/EIS will provide for each of the following: -minimizing consumptive use of the grazing resource by domestic livestock;". I was unable to find this alternative. In addition, the RMP falls short in providing alternatives that provide for: "-recognition and protection of sensitive ecological or visual environments; -designation and protection of areas of critical environmental concern or other special ecological areas; and -protection or enhancement of those values on public lands within the resource area which are relatively scarce within the public domain as a whole". The alternatives that are supposed to fulfill these requirements should be greatly expanded.

Maps should have been included showing the location of land the BLM is considering for disposal (p.2-4). It is unreasonable to expect the RMP reviewer to plot all of these lands on a map so that their significance can be evaluated.

On p.2-15, under Alternative E, is the statement "The goal of alternative E is to manage public lands for multiple use of public resources, as long as grazing use is maintained at existing levels ..." (emphasis added). According to this statement, grazing is the most important and dominant use of the SJRA-all other uses of the resource area are secondary. I emphatically disagree with this management decision. It does not provide for "balanced" land management. Grazing should not be allowed to dominate the RMP.

On pp.2-74,75, ORV use is allowed on existing roads and trails in SPNM ROS areas. Since the SPNM areas have to be at least .5 miles from all roads, SPNM class areas should be included in the "Closed to ORV Use" category. It doesn't make sense to allow ORV use in SPNM areas when you consider the definition of SPNM areas. Also, all ACECs should be placed in the "Limited to Designated Roads and Trails" category. This would allow more flexible management of sensitive areas.

On p.3-71, the "limit" of 150 people per day launching on the San Juan River is too high. With that number of people, the SPNM Criteria on p.3-69 cannot be met. For example, I was on the San Juan River on Memorial Day weekend in 1985. I counted at least 20 boats at Slickhorn Canyon and we were rarely out of sight of other boats. No meaningful "semi-primitive" experience can be

RESPONSE TO COMMENT 101 OWEN SEVERANCE

[Comment page 3]

Current operating procedures call for the reclamation of all surface disturbance (draft page A-4).

This comment correctly notes that, under the preferred alternative, no areas in SJRA would be closed to mineral leasing. About two-thirds of the surface of SJRA would have protective special conditions applied to leasing (draft table S-1). The special conditions range from slight to extensive restriction of activities (draft appendix A). (*See the response to comment 9, Southern Utah Wilderness Alliance, comment page 52.*)

Page 1-10. Alternative D considers the minimum level of livestock use thought to be feasible. Under this alternative, livestock use would be excluded or substantially reduced over about 70 percent of SJRA.

Every alternative assessed in the draft provides for protection of sensitive areas. Alternative D assessed the effects of maximizing protection, and the resulting impacts on other resource values were unacceptable.

The lands proposed for disposal under the different alternatives were not mapped because the parcels are too small to be shown accurately on maps of the scale used in the draft. A complete legal description was given in draft appendix Q, and the tracts can be picked out in figure I-5 (draft page I-15).

Page 2-15. In response to this comment and to reflect changes made to the preferred alternative because of the public comments received, the goal statement and trade-offs for the preferred alternative have been revised (see revisions to draft pages 2-15 and 2-16). The goal statement in the draft conforms to BLM grazing policy that use adjustments will not be made until adequate monitoring is done, unless based on other conflicting uses (draft pages 2-6 and 3-54, appendixes B and J).

Pages 2-74, 2-75. BLM recognizes that there are no roads or trails in ROS SPNM areas, or else the ROS class would be different. BLM also recognizes the possibility that roads or trails could be constructed within areas now classed as SPNM; the ORV designations take future conditions into account. The draft RMP/EIS applied the lowest level of ORV restriction necessary to resolve resource conflicts.

Page 3-71. Limits on recreational use needed to meet the objectives of recreation management will be addressed at the activity plan level, not in the RMP (draft pages A-29 and A-36).

enjoyed with that many people on the river at the same time. In addition, the impacts on the River's ecosystem are too great because what used to be temporary impacts are becoming permanant impacts on the soil and riverside vegetation.

On p.3-81 is the only reference to the "U-95 Corridor Study" (although not by name). This document is not mentioned in the "References" or in any of the management guidelines. According to the statement on p.3-81, the BLM used this document to pursuade the State to modify its plans for chaining along U-261, but nowhere in the RMP does the BLM state that the "U-95 Corridor Study" will be used to guide BLM decisions affecting this Visual Corridor. This hypocrisy should not appear in the final RMP. The BLM should recognize the importance of the visual resources along U-95, U-261, and U-263 and use the "U-95 Corridor Study" as an important planning document (which it is).

The draft RMP grossly understates the visual, cultural, wildlife, and non-motorized recreation values in the SJRA and emphasizes grazing, mineral exploration, and ORV use. Alternative E should be rewritten to present a more objective and balanced RMP. Cultural Resources in the SJRA (a non-renewable resource) should be given proper recognition through a Cultural Resource Management Plan that includes all of the Resource Area. Many additional ACECs and ONAs should be established as stated earlier. The Visual Resource Inventory understates the Scenic Quality ratings in several parts of the SJRA and thus has prevented several ACEC nominations. The VRI should be reviewed and corrected. The draft RMP should be extensively revised so that the outstanding values found on this part of the Colorado Plateau are recognized and protected.

Sincerely,

Owen Severance
P.O. Box 1015
Monticello, Utah
84535

RESPONSE TO COMMENT 101 OWEN SEVERANCE

[Comment page 4]

Page 3-81. Regarding the U-95 corridor study, see the response to comment 98 from Owen Severance.

The comment regarding a perceived lack of objectivity in the preferred alternative is noted.

The draft provides that CRMPs will be developed for several cultural properties (draft page 2-6, table 2-2, table 2-7, and appendix B), and activity plans will be developed for any ACEC designated to protect cultural resources. The cultural use allocation zones will also provide a general level of planning guidance for cultural resources throughout SJRA (draft pages 2-6 and 3-60, figure 3-15, and table 3-9).

While preparing the MSA and draft RMP/EIS, BLM staff reviewed the visual inventory data for SJRA and found it to be generally sound. Some revisions have been made on the basis of comments received on this draft (see responses to comment 2, National Parks and Conservation Association, comment page 17; and comment 97, Owen Severance). The ratings for scenic quality, visual sensitivity, and distance zones, as well as the resulting VRM classes, are based on field conditions, which change; the visual inventory is periodically reviewed and updated as needed.

Change to the EIS? Yes.

COMMENT 102

31 October, 1986

Scott T. Smith
149 West Center
Logan, UT 84321

Ed Sherrick
Area Manager
Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

COMMENTS ON THE DRAFT SAN JUAN RESOURCE MANAGEMENT PLAN (SJRMP)

Because of the long term effect it would have on the heart of the Colorado Plateau the SJRMP is the most important document to be produced by the BLM in Utah for a long time. The San Juan Resource Area (SJRA) contains some of the most unique and sensitive lands in the world, and contains the highest density of Anasazi cultural sites yet found. Many of the largest chunks of pristine de-facto wilderness left in the lower 48 states are contained in the area.

In light of the extraordinary nature of the area, it is disappointing and distressing to find the BLM once again promoting industrialism on the public lands under the guise of "multiple use". Like every management strategy promulgated by the BLM in recent memory, the SJRMP is biased towards commodity production at the expense of every other value. The most glaring example of this is the failure by the BLM to even recognize cultural resource protection as a planning issue even though the draft plan states that "the SJRA may contain 200,000 archeological sites" and "the rate of disturbance and destruction of cultural resources appear to be accelerating". The plan notes that "Protection of cultural resources is inadequate to insure their availability for all proposed uses now and in the future". The BLM appears to recognize importance of cultural sites so **why does the BLM refuse to identify their management as a "planning issue" of adequately address their protection?**

The SJRA also contains much land deserves protection as National Wilderness Areas, but few areas are identified in the flawed BLM statewide wilderness EIS, and most of the area will not receive interim management protection or much protection at all. The SJRMP is in effect a clear call of "come and get it" to Exxon and Union Oil, to the roadbuilders, the overgrazers and the pot hunters.

RESPONSE TO COMMENT 102 SCOTT T. SMITH

[Comment page 1]

BLM does not agree that the preferred alternative is slanted toward commodity production "at the expense of every other value." See the response to comment 2 from National Parks and Conservation Association, comment page 31.

Management of cultural resources per se does not meet the definition of a planning issue (draft page 1-1). As a result of public comment, the discussion on planning issues and the treatment of cultural resources under the different alternatives has been expanded in this proposed RMP and final EIS (see the revisions to draft page 1-6).

BLM recognizes the need to protect cultural resources (draft page 2-6) and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

Regarding protection of wilderness values, see the response to comment 13 from Utah Wilderness Association.

Some specific changes that would keep the SJRMP from being a disaster:

***Make protection of cultural values a "planning issue" and amend the SJRMP or produce an additional Cultural Resource Plan** to provide for actions that would adequately protect cultural sites. These actions must include:

- -protect areas with potential cultural values until intensive inventories can be done.
- -eliminate energy exploration and development, ORV use, chaining an all other activities that could damage cultural values in areas where they exist.
- -increase enforcement needed to prevent pot hunting.
- -identify sites for nomination to the national register.

***Give full interim management protection to the potential wilderness areas identified in the Utah Wilderness Coalition's 5 million acre proposal** until a BLM wilderness bill is passed by congress.

*The Federal Land Policy and Management Act (FLPMA) requires the BLM to "**give priority to the designation of Areas of Critical Environmental Concern" (ACECs)**. In the SJRMP the BLM has partially done this in Alternatives C and D. However, most of the ACECs identified are not adopted under the preferred alternative. **The BLM has given priority to industrial development and chaining, not at all in line with FLPMA's mandate!** The SJRA also contains many areas that should be designated Outstanding Natural Areas (ONAs). All the areas listed below deserve the protection of full-fledged National Wilderness designation, but in lieu of that for the time being they must be designated ACECs and ONAs as listed:

- -**Dark Canyon and Middle Point**. An ACEC to protect the scenic, natural, and cultural values. ONA for the entire area.
- -**White Canyon Complex**. An ACEC to include Cheesebox, Gravel, Long, Fortknocker Canyons and the rest of the land between US95 and the Dark Canyon Plateau. The area has outstanding scenic, natural and cultural values. ONA for the entire area.
- -ACEC to protect the scenic area **around Natural Bridges National Monument** including Harmony Flat, Deer Canyon, and the area between the Monument and the National Forest. ONA for the entire area.
- -**Canyonlands Basin**. An ACEC to protect the scenic, natural, and cultural values for all the land within the basin from Lockhart Basin to the Manti-La Sal National Forest. ONA for the entire area.

[Comment page 2]

Protection of cultural resource values does not qualify as a planning issue. See response to comment 2, National Parks and Conservation Association, on this topic.

Under IMP, protection is afforded to areas under consideration as part of BLM's wilderness review process (draft pages 1-2 and 2-7). The RMP discusses management of these areas if they are released from the wilderness review. The RMP does not impose IMP on areas not under wilderness review; this level of management would not comply with BLM policies or with the wilderness review manadated by FLPMA. The public land area in SJRA is only 1.8 million acres; therefore, the RMP cannot cover the 5 million acres referenced in this comment.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's nominations for specific areas are accepted. See the response to comment 2, National Parks and Conservation Association, for a discussion of these areas.

BLM does not agree that the preferred alternative gives "priority to industrial development and chaining." BLM is not aware of any industrial developments proposed for public lands in SJRA. While the draft identified areas having physical potential for land treatments, including chainings, no specific projects have been proposed (see the response to comment 3 from National Wildlife Federation, comment page 9).

BLM has dropped the ONA designation in favor of the ACEC designation.

Comments on SJRMP - Scott T. Smith - page 3

-**Beef Basin**. ACEC for the land south of CAnyonlands between the Park, the National Forest and the Dark Canyon Plateau including Beef BAsin, FAble VAlley and Cathedral Butte, to protect the scenic, natural and cultural values. ONA for the entire area.
-ACEC to protect the cultural, scenic and natural values of **Red, Cedar, Forgotten, and Moki Canyons, and North Gulch**. This area contains outstanding archeological sites. ONA for the entire area.
-**Cedar Mesa**. ACEC to protect cultural, scenic, and natural values on Cedar Mesa including Grand Gulch, Johns, Slickhorn, Fish, Owl, Lime, Road, Mule, and Arch Canyons and the mesa top. ONA for the entire area.
-**Alkali Ridge**. ACEC as proposed in Alternative C. ONA for the entire area.
-**Hovenweep**. ACEC as proposed in Alternative D. ONA for the entire area.

*Meaningful protection must be given to ACECs and ONAs. All ACECs and ONAs must be:
-closed to oil and gas leasing.
-closed to ORVs except for existing roads except where roads encourage vandalism and pot hunting. These existing roads must be closed.
-closed to mining.
-excluded from land treatments, chaining and other grazing "improvements".
-closed to commercial and private woodcutting.
-managed as Visual Resource Management Class I areas.

The SJRMP falls short in failing to address a number of future management decisions including:
-nuclear waste near Canyonlands.
-state acquisition and development of land around Natural Bridges National Monument.
-mineral demand and conditions under which mineral development should or should not occur. Nearly all the SJRA is left open, with virtually no mention of a mining management plan in the SJRMP.
The SJRMP will remain inadequate until these issues are addressed.

Thank you for the chance to comment on the SJRMP.

Scott Smith

3

RESPONSE TO COMMENT 102 SCOTT T. SMITH

[Comment page 3]

For potential ACECs, BLM has prepared management prescriptions that would be needed to protect the values identified as at risk (see draft appendixes B and I, as revised). See the response to comment 2 from National Parks and Conservation Association on this topic.

The San Juan RMP does not discuss nuclear waste near Canyonlands, nor the disposal of nuclear waste within SJRA, because BLM has received no proposals for this type of activity (draft page 1-2, 1-10, and 2-10). See the response to comment 2 from National Parks and Conservation Association on this topic. Similarly, large-scale state acquisiton projects are not assessed because specific details had not been worked out at the time this RMP/EIS was prepared; state in-lieu selections are handled as part of the ongoing case load of BLM's realty program (draft page 1-2, 1-10, and 2-4). At such time as any project involving public lands is proposed, the effects on public lands and resources would be assessed through a site-specific NEPA document (draft page 2-1, A-1 and A-29). (The planning criteria, cited here from chapter 1, were issued for public review and comment in 1985; draft page 5-9.)

Draft chapter 3 discussed demand for mineral resources and their potential. The conditions under which development would occur under the various alternatives were described in chapter 2, and alternative management prescriptions for minerals development were presented in appendix A.

Change to the EIS? Yes.

1 November 1986

COMMENT 103

Dear Mr. Scherick,

Concerning the San Juan Resource Area Management Plan, I urge your consideration and support of Alternative D, to increase the habitat and cultural resource protection.

The BLM's support of the compromise Alternative E would sacrifice the rich prehistoric Anasazi remains. The highest and best use of the BLM lands in the San Juan County area is the protection of cultural resources and wildlife habitat. The BLM should limit "chaining" for grazing, especially on Cedar Mesa and the Grand Gulch Plateau; limit road construction; limit ORV use to existing roadways; allow no surface occupancy for oil and gas leases to give maximum protection to known and unknown cultural resources in the San Juan County area.

The BLM over-emphasizes commodity values in this undisturbed, natural area. The BLM should give full interim protection to all wilderness study areas.

RESPONSE TO COMMENT 103 — DOUGLAS STARK

[Comment page 1]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for or against any alternative presented in the draft.

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA.

The preferred alternative has identified several management prescriptions to protect cultural resources and wildlife habitats in SJRA (draft appendix A).

BLM does not agree that the proposed RMP would emphasize commodity development in undisturbed areas; the proposed plan provides for special management of undisturbed areas that would preclude or limit any type of surface development (draft appendix A).

Regarding protection of wilderness values, see the response to comment 13, Utah Wilderness Association. All areas under wilderness review will continue to be managed under IMP, regardless of planning decisions in the RMP (draft page 1-2).

Please send me a copy of the BLM's final EIS on the RMP.
Thank you.

Sincerely,
Douglas Stark
2698 Wren Road
Salt Lake City
Utah 84117

RESPONSE TO COMMENT 103 DOUGLAS STARK

[Comment page 2]

A copy of the proposed RMP and final EIS will be sent to everyone who commented on the draft.

Change to the EIS? No.

COMMENT 104

TO: Bureau of Land Management,
San Juan Resource Area
PO Box 7
Monticello, Utah 84535

Dear BLM:

The San Juan Resource Management Plan (SJRMP) has potential to protect Southeast Utah's outstanding cultural, scenic, recreational and wilderness values. The integrity of areas like Grand Gulch, Dark Canyon, Beef Basin and the lands surrounding Canyonlands, Hovenweep and Natural Bridges are threatened by oil and gas leasing and ORV use.

The Federal Land Policy and Management Act (FLPMA) requires that priority be given to areas designated as ACECs (Areas of Critical Environmental Concern). FLPMA defines ACECs as "areas within the public lands where special management attention is required . . . to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes . . .".

I urge you to designate the following areas as ACECs:

I. Canyonlands Basin

To protect scenic values for all lands in the Canyonlands Basin which are visible from the National Park or BLM's Needles and Canyonlands overlooks. Scenic views are integral to visitor enjoyment.
To protect cultural values between Hart's Draw and the park boundary.

II. Beef Basin

To protect the scenic continuity of the Manti-La Sal National Forest and the Dark Canyon Plateau which are visible from the National Park. This area also has outstanding cultural history and archaeological research potential.

III. Cedar Mesa

To protect cultural, scenic, and natural values. I propose boundaries consistent with the archaeological district proposed for designation under alternatives C & D. Cultural resources are significant in this area because of the wealth of undisturbed Basket-Maker and Pueblo sites. This area also provides habitat for Bighorn sheep and various protected Raptors.

RESPONSE TO COMMENT 104 JOCELYN C. STOUDT

[Comment page 1]

For a response to this comment, see the response to comment 93, David C. Saltz.

Change to the EIS? Yes.

IV. Alkali Ridge/Hovenweep areas

The ACEC proposed under alternative D will protect the Alkali Ridge areas high density of cultural sites from energy exploration, development and vandalism. I support a 2,000 acre ACEC to protect the Hovenweep area which has superior cultural and scenic values.

V. Natural Bridges

I support an ACEC to protect scenic values important to visitor enjoyment. The boundary should include Harmony Flat (southeast of the Monument) and the lands between the Monument and the National Forest. This area should include Woodenshoe Buttes, The Toe, and Deer Canyon.

VI. Glen Canyon National Recreation Area

I support an ACEC to protect scenic, natural, cultural and wildlife values for all lands in the San Juan Resource Area that lie within Glen Canyon National Recreation Area.

VII. White Canyon Complex

I support an ACEC to protect scenic and cultural values for the area north of Utah 95 and south of the Dark Canyon Plateau and the Manti-La Sal National Forest. This includes Cheesebox, Gravel, Long, Fortknocker canyons and landmarks such as Jacob's Chair. Protection is important to preserve scenic views from U-95 and to preserve undisturbed cultural sites.

VIII. Moki-Red Canyon Complex

I support an ACEC to protect cultural values in these areas. Boundary should include the upper ends of Red, Cedar, Forgotten and Moki Canyons, North Gulch and Upper Lake Canyon. Cultural resources are important to the understanding and interpretation of cultural data collected before Glen Canyon was flooded.

IX. Dark Canyon and Middle Point

I support an ACEC to protect the scenic, natural and cultural values provided by the pristine character of these areas.

These areas should all be designated as "Outstanding Natural Areas" (ONA's) because of their unusual natural characteristics that need management protection.

Please establish management prescriptions which provide meaningful protection for ACEC's and ONA's and the values they were established to protect.

The preferred alternative E will result in damage to about 15,678 cultural sites. I feel the BLM has failed to adequately address the protection of cultural resources in the RMP. Please amend or supplement the SJRMP to identify special management actions to protect these values.

The development of a "Cultural Resource Plan" will help highlight to Congress the need for additional funding for cultural resources management in the San Juan Area!!!

Thank you for your help and cooperation.

Jocelyn C. Stoudt

J C. Stoudt
416 N. Hollywood
Ft. Collins, CO
80521

JOHN R. SWANSON
P. O. Box [illegible]
Minneapolis, Minn. [illegible]

COMMENT 105

September 2, 1986
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535

Greetings;

Please accept my comments concerning Resource Management Plan and Environmental Impact Statement San Juan Resource Area - Draft -.

I have been acquainted with this area of Utah for many decades and continue to retain the very firm belief that this vast San Juan Resource Area contains outstanding wilderness, scenic, wildlife, fish, botanic and cultural resources of certain national significance.

All of which fully benefit Man, and fully benefit all life on this endangered planet.

I, then, [illegible] oppose this proposed alternative as such will [illegible] this area and thus, [illegible] destroy this San Juan Resource Area.

And in this regard, I strongly recommend that this San Juan Resource Area be dedicated as a permanent Natural Preserve, with each unit of the areas as administered by the Bureau of Land Management dedicated as a permanent Natural Preserve.

As the purpose of the Bureau of Land Management, United States Department of the Interior, is to preserve all of the wilderness, wildlife, fish, botanic, cultural and scenic resources located in the areas as administered by the Bureau of Land Management, with each such Natural Preserve to fully protect ecosystems, preserve watersheds, save and enhance all wildlife habitat and botanic habitat areas, fully protect and promote all biological resources and their natural diversity, preserve rivers and streams - creeks, restore - recover all land - damaged areas to their natural environmental conditions, and to preserve, protect, strengthen and expand wilderness.

As wilderness is the foundation of our land and water resources with the purpose of all land and water resources planning and management to preserve, protect, strengthen and expand wilderness.

I, then, strongly urge that each of the following areas - acres as located in the San Juan Resource Area as administered by the Bureau of Land Management, be dedicated as Wilderness; as each unit features superb wilderness attributes, and to be included in our National Wilderness Preservation System, at this time.

With the clear understanding that such areas - acres are presented as a few examples only, of the many outstanding potential wilderness units now located in this San Juan Resource Area - Bureau of Land Management administered:

Indian Creek 38,249.
Bridger Jack Mesa 46,912.
[illegible] 49,976.
[illegible] 14,867.
Harts Point 51,322.
Arch Canyon 11,416.
Comb Ridge 17,619.
Cheesebox Canyon - [illegible] Canyon 28,273.
Cross Canyon 13,966.
Dark Canyon Country 132,439.
Fish Creek 72,072.
[illegible] 9,148.
Grand Gulch 151,234.
[illegible] Canyon 44,634.
Harmony Flat 13,229.
Mancos Mesa 129,673.
Mule Canyon 6,602.
Nokai Dome - [illegible] Canyon 93,681.
Road Canyon 68,412.
[illegible] Canyon 7,631.
Squaw - Papoose Canyon 8,249.

These additional areas - acres to total some 1,690,000 acres - Wilderness to be located within this San Juan Resource Area, as administered by the Bureau of Land Management, and to be included in our National Wilderness Preservation System.

To consider this Resource Area as a National Critical Habitat Area, to protect wildlife including the Bald Eagle, Peregrine Falcon, Black-footed Ferret, Humpback Chub, Bonytail Chub, Colorado Squawfish, Humpback Sucker and Mountain Lion.

To restore areas to their natural environmental condition.

To establish this San Juan Resource Area as a dedicated permanent National Wilderness Wildlife Biological Natural Preserve, with No surface and subsurface activities developments.

And to select the following alternative as this Resource Area's permanent planning and management alternative;

Alternative Preservation: Wilderness Wildlife - Biological [illegible] Reserve.

To permanently ban all forms of developments - activities in all current, proposed and potential wilderness; with No Release of any Roadless Areas.

To acquire all inholdings in all Public Lands, with no disposal of any Public Lands.

Let us save our natural lands and waters; let us save America!

Sincerely,
John R. Swanson.

RESPONSE TO COMMENT 105 — JOHN R. SWANSON

[Comment page 1]

BLM appreciates the concerns raised.

Designating the entire SJRA as a nature preserve, or for the other uses suggested in this comment, would not be within the intent of FLPMA (see draft page 1-9). BLM's purpose, as spelled out in FLPMA, is much broader than that stated in this comment.

Regarding wilderness designation and protection of wilderness values, see the response to comment 13, Utah Wilderness Association.

Change to the EIS? No.

COMMENT 106

1201 Adams Street
Denver, CO 80206-3417
Novermber 1, 1986

Bureau of Land Management
San Juan Resource Area
PO Box 7
Monticello, UT 84535

Dear Bureau of Land Management:

Since moving to Colorado in the late 60's, it has been my pleasure to vacation in Utah on a number of occasions, with most of these vacations being to the areas of Southeast Utah in the San Juan Resource Area. I have found that hiking and camping in Canyonlands, The Manti-La Sal National Forest, Natural Bridges, Hovenweep National Monument, etc. to provide outstanding recreational opportunities. I would strongly oppose any management plan for the area which does not protect the wilderness and wildlife values, and does not place the protection of the wilderness and wildlife above the short term uses of grazing and mineral production.

Second in importance to the protection of wilderness and wildlife values is the protection of the archeological resources in the area. Few parts of our country have this national treasure and protecting them for the future should easily overshadow the short term uses of grazing and mineral production.

Since some of the most outstanding areas have already received protection as National Parks, it is important that adjacent areas be managed so as to provide a buffer to fully protect these areas of national importance. This protection must be included in your management plan. Many of these areas are visible from the Park areas, and other uses in the adjacent lands should not detract from the experience visitors have in the Parks.

As a management agency, the Bureau needs to begin to make decisions using a broader, and longer prospective than would an individual or a corporation. Not only are these public lands being managed with the need to stress public rather than special interest use, but the special caracter of the San Juan Resource Area, with the long vistas and lack of human impacts means that even stricter measures are appropriate than might be used in less sensitive lands.

Sincerely,

Donald R. Thompson

RESPONSE TO COMMENT 106 DONALD R. THOMPSON

[Comment page 1]

BLM agrees that SJRA contains appreciable scenic and natural resource values.

The proposed RMP provides for preparation of HMPs and application of seasonal use conditions to better manage wildlife values (draft table 2-7 and appendix A). Regarding preservation of wilderness values, see the response to comment 13 from Utah Wilderness Association.

BLM agrees that cultural sites are an important resource in SJRA and recognizes the need to protect cultural resources (see draft page 2-6). The proposed RMP includes special management prescriptions designed to protect cultural resources (see revisions to draft chapter 2 and appendix A).

Congress has determined that units of the NPS are to be managed under NPS laws, and that public lands, even those adjacent to units of the NPS, are to be managed under FLPMA and other public-land laws. See the response to comment 2, National Parks and Conservation Association, for a broader discussion on this topic.

The proposed RMP provides long-term guidance for management of public lands and resources in SJRA. The RMP would be revised as necessary to remain current (draft appendix B).

Change to the EIS? No.

COMMENT 107

October 25, 1986
Logan, Utah

Mr. Ed Scherick
Area Manager
San Juan Resource Area
Moab District
USDI Bureau of Land Management
P.O. Box 7
Monticello, UT 84535

Attn: RMP

Dear Mr. Scherick:

The draft Environmental Impact Statement for the San Juan RMP presents possible alternatives for the special designation of two relatively small areas. These are Bridger Jack Mesa and Lavender Mesa. I am writing to express my strong support for Research Natural Area status in particular, and to supply some comments that may assist your staff in compiling the final EIS. I would favor the alternative (or composite alternative) recommended by The Nature Conservancy, inasmuch as their public-lands representative has the most current knowledge of the mesas. That organization also tends to take a sensible, objective, non-confrontational approach to land setasides.

My comments are keyed to the areas as follows:

Lavender Mesa

I definitely think that the entire mesa top should be designated a Research Natural Area, and that such an action should be coupled with strict stipulations regarding visitation and use. But first of all, more concrete information about the area should be gathered. The Nature Conservancy has extensive experience in compiling technical reports based on careful groundwork, and might be asked to do this per the ongoing agreement with the State Office. I am by no means an "expert" on this place, having no particular zoological skills and having only visited it once (and briefly, to limit impact from foot travel).

Perhaps the most important additional stipulation might govern helicopter landings. Should these be "with permission only", so that the place does not eventually become a stopover for curiosity-seekers? I tend to think so. In a similar vein, should rock-climbing be allowed, given that there are countless square miles of Wingate Sandstone cliffs to climb elsewhere in the county?

The Canyonlands National Park staff may be able to assist in naming a scientist experienced in surveys of "island" mesa tops like this one, and who could place Lavender Mesa's features in a broader ecological and biogeographic context.

(page 2, please)

RESPONSE TO COMMENT 107 NICHOLAS VAN PELT

[Comment page 1]

BLM appreciates this support for the designation of two RNAs, but has dropped the RNA designation in favor of the ACEC designation. The proposed RMP would designate Bridger Jack and Lavender Mesas as ACECs.

This comment favors the Nature Conservancy's recommendations. See the response to comment 4 from The Nature Conservancy.

Lavender Mesa

If Lavender Mesa is designated as an ACEC, an activity plan would be prepared to cover management of the area. The activity plan would identify additional data needs and the means to obtain the information (draft appendix B).

Helicopter landings and rock climbing are not currently thought to be causing any substantial impacts to the proposed ACEC; therefore no specific restrictions on such use have been developed. The mesa top would be monitored (draft appendix B), and management conditions could be changed if necessary. The proposed ACEC is intended to protect the mesa top, not necessarily the surrounding terrain.

BLM agrees that NPS could be consulted if their professional expertise was required.

Mr. Ed Scherick
October 25, 1986
Page 2

Bridger Jack Mesa

Because the mesa is such a distinct unit, it would seem only "natural" to designate it in its entirety. However, if that were done, the area would become (I believe) the largest RNA in the state. Local and county interests might justifiably be concerned about this -- "wilderness" by administrative means. The Bureau will have to weigh comments received in this light. If there is no opposition, I think it would be preferable to set aside the entire mesa top, as features of interest occur throughout it and it provides an unbroken gradient from quite dry (north end) to relatively mesic, closed communities (south end).

For clarification's sake--I have no study plots demarcated on the mesa top, but I do plan to undertake some newer, better-controlled studies in the future using permanent plots or belt transects. However, BLM itself should be considering how best to use the area as a management baseline.

I am under the impression that a very few deer hunters use the mesa annually because access is so restricted and there are some large deer up there. No doubt they would want to continue this use, and the designation applied should recognize this. The Utah RNA program has known from the beginning that hunters could not reasonably be excluded from natural areas, particularly during the general deer season. Perhaps signs could be placed alongside the two trails, explaining the area's value and asking for good outdoor conduct, but not prohibiting hunting (or, for that matter, hiking and backpacking). Horse grazing should be restricted, because that is the impact (herbivory, trampling, and the introduction of weed seeds) that the "park" communities were released from in the 1960's.

In closing, I commend BLM for the attention given these areas, and I am glad to see that the information in the Master's thesis has been of value in writing the Management Situation Analysis and the draft EIS. If county government officials object to designation (either size alternative) of Bridger Jack Mesa as an ACEC or RNA, I would be available in spring or summer of 1987 to discuss the area's value and future and thus help realize a consensus about appropriate designation and stipulations.

Thank you for your attention.

Sincerely,

Nicholas Van Pelt

Nicholas Van Pelt
Dept. of Range Science
Utah State University
Logan, UT 84322-5230

cc: Mr. Joel Tuhy, The Nature Conservancy, Wellsville, Utah

RESPONSE TO COMMENT 107 NICHOLAS VAN PELT

[Comment page 2]

Bridger Jack Mesa

The draft analyzed impacts from designating all of the mesa top as an RNA, and from designating only part of the mesa top. Public comments indicated little, if any, public concern that designation of the entire mesa top would not be preferable.

As noted earlier, if the mesa is designated as an ACEC, an activity plan would be prepared to cover management of the area. The activity plan would identify additional data needs, and how to obtain these.

Designation of Bridger Jack Mesa as an ACEC should not have any impact on hunting (if any) that occurs on the mesa top. The decision as to whether or not to place signs around the mesa would be made at the activity planning level, not in the RMP; BLM will consider this suggestion at that time. Grazing by pack horses would be prohibited, and recreational use (including hunting) would be limited through a permit system if necessary to prevent resource damage (draft page A-21). BLM recognizes that horses, humans, and other animals could introduce weed seeds to the mesa top.

BLM appreciates the work this commentor has done in researching these areas, and has found commentor's thesis very helpful.

Change to the EIS? No.

COMMENT 108

John Veranth
4460 Ashford Drive
Salt Lake City, Utah 84124

October 31, 1986

Ed Scherick, San Juan Area Resource Manager
Bureau of Land Management
P.O. Box 7
Monticello, Utah 84535
Attn: RMP

Dear Sir:

I request that these comments be included in the public record for the San Juan Resource Area Resource Management Plan draft EIS. Also, I request a copy of the final RMP and EIS documents when they become available.

I have worked here in Utah as an engineer in the minerals industry for the past 12 years and have been a frequent visitor to the deserts and canyons of San Juan County.

Personally, I support Alternative D as it offers the greatest degree of protection to the real resources south east Utah - the irreplacable scenic, geological, and archaeological treasures which are found nowhere else.

However, Alternative D is unlikely to be implemented. Of the remaining alternatives, I consider Alternative E to represent the best balance of preservation and other uses of the land.

Regarding the term "No Permanent Resource Use Or Production": this term reflects a one-sided view of resources. Once ranchers argued that grass was of no use until a cow stuck her nose into it and I suppose some still feel that way. Today we recognize the value of grass land for erosion control and wildlife habitat as well. The geological and archeological resources of the area are of far greater national significance than the small amount of cattle, fuel wood and minerals produced from the area. Preservation of these resources for scientific study and recreational enjoyment is a beneficial use of the resource.

Regarding evaluations of mineral potential in the DEIS: Mineral potential is limited by extraction economics and market requirements not by lack of resources. For example existing uranium mines and patented claims are more than adequate to meet present and forseeable needs in this country. Placing public lands in restricted categories for the duration of the RMP will not result in any real loss of

RESPONSE TO COMMENT 108 JOHN VERANTH

[Comment page 1]

BLM appreciates this support of alternatives D and E, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

The phrase "no permanent resource use or production" was used in the draft (table S-1) to indicate areas where extractive resource production would not be allowed, and refers primarily to nonrenewable resources. Forage plants are considered to be a renewable resource. BLM recognizes the value of vegetation in erosion control and wildlife habitat (draft pages 3-28 and 3-41).

Grazing use of public lands is authorized under the Taylor Grazing Act and FLPMA, and will be allowed to continue within the parameters of BLM's multiple-use mandate.

The term "mineral potential" as used in the draft is the potential for mineral occurrence, not mineral development. Mineral potential is based on geology, stratigraphy, and other physical characteristics, and would not change because of economic fluctuations; it might change if new information became available (perhaps because of mineral exploration and development, such as drill hole data). This comment apparently refers to the potential (probability) that the mineral resources will be extracted, which is based in part on economics. This is discussed in draft chapter 4, as are the effects on minerals production that would result from placing restrictions on surface use of public lands.

By increasing production costs, surface use restrictions could render production of some mineral deposits uneconomical, where those same deposits could be economical to produce under lesser restrictions. The effect of any actions taken under this plan on national or worldwide economics would be negligible.

DEIS/RMP
VERANTH P 2 of 2

production.

Regarding the economic impact of recreational visitors: Average amounts fail to recognize that out-of-state visitors spend considerable amounts on their trips, far more than a local visitor. Out-of-state visitors are a net economic gain for Utah.

For in-state visitors, expenditures in San Juan county are limited due to lack of facilities where they can spend money. The museum in Blanding keeps bankers hours, all the motels in Monticello have the "No Vacancy" signs turned on after midnight, and it is difficult to buy an early breakfast in any of the towns on a holiday weekend. My visits to the area would result in far more economic benefit to the nearby communities if more establishments attempted to serve the recreational visitor who drives down from Salt Lake for the weekend.

More aggressive development of the tourist industry in southern Utah would create more local jobs than opening tens of thousand additional acres to grazing.

Regarding range management practices: range management should consider wildlife and archeological values. Chaining is an especially destructive practice and should not be allowed in any area with potential archeological resources. Controlled burning is an alternative technique to enhance grass in wooded areas and is less destructive to shallow buried artifacts. Shaping vegetation manipulation sites to follow terrain features rather than section lines is less visually intrusive.

Domestic sheep should be kept out of all potential big horn sheep range as the two species are not compatible.

Sincerely,

John Veranth

John Veranth

RESPONSE TO COMMENT 108 JOHN VERANTH

[Comment page 2]

The average expenditure figures used in chapter 4 of the draft reflect expenditures by both in-state and out-of-state visitation, and corresponding local expenditures.

The RMP/EIS is not an effective forum to discuss business hours in San Juan County, or the pros and cons of tourism development. BLM has no control over these matters.

Range management practices described in the draft consider other resource values, such as wildlife or archaeology. The proposed RMP indicates where grazing uses have been modified to protect other resource values. A site-specific NEPA document would be prepared prior to implementation of a range project, including land treatments (chainings) mentioned in this comment.

The potential land treatments shown in the draft are physically suitable areas, not proposed projects. The draft is revised to clarify this (see revisions to draft pages 2-6 and 2-68). The method of treatment, such as controlled burning suggested in this comment, would be determined when a project was actually proposed. The NEPA document would assess impacts to other resources and provide for mitigation of adverse impacts, such as shaping the sites as suggested in this comment (draft pages 2-1, A-1, and A-29).

Domestic sheep do not currently occupy bighorn sheep habitat in SJRA. It is not anticipated that any application for change of livestock to sheep will be received during the analysis period used in the draft (until 2000) (draft appendix U). Before any proposal to change from cattle to sheep could be considered, the RMP would have to be changed (draft page A-30); if adverse impacts to other resources, such as bighorn sheep, could not be mitigated, the change would not be allowed.

Change to the EIS? No.

COMMENT 109

October 31, 1986

Bureau of Land Management
San Juan Resource Area
P.O. Box 7
Monticello, Utah 84535

Dear Bureau of Land Management:

In the San Juan Area lie some of the rare jewels of the world, from the point of view of wilderness, recreation and archeology. This area is more of a treasure than at anytime in history since the world is so overcrowded and impacted by the presence and works of man.

Southern Utah is one of the few dark places on a satellite photo of the U.S.A. at night which I have hanging above my desk. For many of us this represents a refuge from constant civilization. I urge you most heartlily to manage the San Juan Resource Area with the protection of wilderness, non-motorized recreation and archeological resources as top priorities.

I would urge you to give special attention to the lands adjacent to the National Parks in this area. The proposed nuclear dump next to Canyonlands is but one example of how I would not manage these resources. (When I visited Canyonlands and Davis Canyon in June of 1984 there was a great deal of water flowing in the area. Given that this proposed dump site is well above the Colorado River, I cannot imagine that such an activity is safe, let alone scenic.) Hovenweep, Natural Bridges and the Glen Canyon National Recreation area are special places that should be protected not only within their boundaries but nearby lands as well. For example, if our natural treasures find themselves buried in smog from coal fired power plants, they will no longer be treasures. If off road vehicles ride indiscriminantly up to their boundaries, the resource is greatly diminished.

I support liberal use of the "Area of Critical Environmental Concern" designation. The grand vistas from Canyonlands overlook should be preserved at all costs. Bob Marshall once proposed and Congress considered a 9 million acre Canyonlands National Park. A tiny fraction of this original proposal made it to official park status. Please dignify as much of what remains with the special ACEC or ONA designations.

I support ONA status for Cedar Mesa roadless areas, White Canyon Complex, Dark Canyon and Middle point. Other areas that deserve special consideration are Moki-Red Canyon Complex, Alkali Ridge and Beef Basin.

RESPONSE TO COMMENT 109 MARTY WALTER

[Comment page 1]

Regarding protection of wilderness values, see the response to comment 13 from Utah Wilderness Association.

Regarding management of public lands adjacent to NPS units, see the response to comment 2, National Parks and Conservation Association. The RMP will not address impacts of "nuclear dumps" discussed in this comment (see draft pages 1-10 and 2-10).

The draft (page 2-8) provides that BLM will manage actions on public lands to meet air quality standards. The impacts to air quality from a specific proposal would be assessed on a project-specific basis (draft pages 2-1, A-1 and A-29).

Under the preferred alternative, a substantial portion of NPS boundaries are adjacent to public lands on which ORV use would be restricted (draft table 2-8). These limitations would be imposed to resolve resource conflicts on public lands.

The proposed RMP provides for designation of several areas as ACECs (see revisions to draft chapter 2 and appendix I). This comment's suggestions for specific areas are noted. See the response to comment 2 submitted by the National Parks and Conservation Association, for a discussion of these areas.

BLM has dropped the ONA designation in favor of the ACEC designation.

I know that you are concerned with the economic well being of the people in your area. They are a part of the environment too, and they must get some consideration. It is my firm belief that for the long term the people of this area will be better off if the area is managed to preserve its unique wild character. True, in the short run money can be made from carbon dioxide mining, uranium, coal, raiding archological areas ("pot hunting") etc. But what this area has to offer the world as a vast, unique wilderness far surpasses anything that could be gained from mining minerals. Programs should be instituted so that people such as myself, who are very much concerned with this unique area of the world, can contribute to the well being of the people of this area in an effort to make them all friends of the wilderness. We should, for example, buy as much of our supplies locally in these areas and contribute to their well being in as many ways as we can when we are there.

Thank you for the opportunity to comment on this world class treasure.

Marty Walter
3333 Nebo Road
Jamestown Star Route
Boulder, Colorado 80302

RESPONSE TO COMMENT 109 MARTY WALTER

[Comment page 2]

BLM agrees that the residents of San Juan County are part of the human environment assessed in the draft.

BLM is not aware of any ongoing carbon dioxide mining in SJRA.

Change to the EIS? No.

COMMENT 110

TO: Bureau of Land Management,
San Juan Resource Area
PO Box 7
Monticello, Utah 84535

Dear BLM:

The San Juan Resource Management Plan (SJRMP) has potential to protect Southeast Utah's outstanding cultural, scenic, recreational and wilderness values. The integrity of areas like Grand Gulch, Dark Canyon, Beef Basin and the lands surrounding Canyonlands, Hovenweep and Natural Bridges are threatened by oil and gas leasing and ORV use.

The Federal Land Policy and Management Act (FLPMA) requires that priority be given to areas designated as ACECs (Areas of Critical Environmental Concern). FLPMA defines ACECs as "areas within the public lands where special management attention is required . . . to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes . . .".

I urge you to designate the following areas as ACECs:

I. Canyonlands Basin

To protect scenic values for all lands in the Canyonlands Basin which are visible from the National Park or BLM's Needles and Canyonlands overlooks. Scenic views are integral to visitor enjoyment.
To protect cultural values between Hart's Draw and the park boundary.

II. Beef Basin

To protect the scenic continuity of the Manti-La Sal National Forest and the Dark Canyon Plateau which are visible from the National Park. This area also has outstanding cultural history and archaeological research potential.

III. Cedar Mesa

To protect cultural, scenic, and natural values. I propose boundaries consistent with the archaeological district proposed for designation under alternatives C & D. Cultural resources are significant in this area because of the wealth of undisturbed Basket-Maker and Pueblo sites. This area also provides habitat for Bighorn sheep and various protected Raptors.

1

RESPONSE TO COMMENT 110

DAVID W. WILLEY

[Comment page 1]

For a response to this comment, please refer to the response to comment 93, David C. Saltz.

IV. Alkali Ridge/Hovenweep areas

The ACEC proposed under alternative D will protect the Alkali Ridge areas high density of cultural sites from energy exploration, development and vandalism. I support a 2,000 acre ACEC to protect the Hovenweep area which has superior cultural and scenic values.

V. Natural Bridges

I support an ACEC to protect scenic values important to visitor enjoyment. The boundary should include Harmony Flat (southeast of the Monument) and the lands between the Monument and the National Forest. This area should include Woodenshoe Buttes, The Toe, and Deer Canyon.

VI. Glen Canyon National Recreation Area

I support an ACEC to protect scenic, natural, cultural and wildlife values for all lands in the San Juan Resource Area that lie within Glen Canyon National Recreation Area.

VII. White Canyon Complex

I support an ACEC to protect scenic and cultural values for the area north of Utah 95 and south of the Dark Canyon Plateau and the Manti-La Sal National Forest. This includes Cheesebox, Gravel, Long, Fortknocker canyons and landmarks such as Jacob's Chair. Protection is important to preserve scenic views from U-95 and to preserve undisturbed cultural sites.

VIII. Moki-Red Canyon Complex

I support an ACEC to protect cultural values in these areas. Boundary should include the upper ends of Red, Cedar, Forgotten and Moki Canyons, North Gulch and Upper Lake Canyon. Cultural resources are important to the understanding and interpretation of cultural data collected before Glen Canyon was flooded.

IX. Dark Canyon and Middle Point

I support an ACEC to protect the scenic, natural and cultural values provided by the pristine character of these areas.

-3-

These areas should all be designated as "Outstanding Natural Areas" (ONA's) because of their unusual natural characteristics that need management protection.

Please establish management prescriptions which provide meaningful protection for ACEC's and ONA's and the values they were established to protect.

The preferred alternative E will result in damage to about 15,678 cultural sites. I feel the BLM has failed to adequately address the protection of cultural resources in the RMP. Please amend or supplement the SJRMP to identify special management actions to protect these values.

The development of a "Cultural Resource Plan" will help highlight to Congress the need for additional funding for cultural resources management in the San Juan Area!!!

Thank you for your help and cooperation.

David W. Willey
Dept. of Wildlife, WARAF Building
Colo. State University
Fort Collins, Colo. 80523

Many of these recommendations were proposed in the initial RMP but not adopted under your preferred alternative E. Please include the above areas

RESPONSE TO COMMENT 110 DAVID W. WILLEY

[Comment page 3]

This comment references "the initial RMP." No such document has been developed; BLM is uncertain as to the meaning of this comment.

Change to the EIS? Yes.

COMMENT 111

Critique and Recommended Revisions of the Socioeconomic Analyses of the Draft Resource Management PLan/Environmental Impact Statement (RMP/EIS) for the San Juan Resource Area, Moab District, Bureau of Land Management

J. Dennis Willigan, Ph.D.
1123 Vista View Drive
Salt Lake City, UT 84112
(801) 582-4910

Comments and concerns:

The Utah Department of Employment Security, Labor Market Information Services, issued a report in September 1985 identifying the poverty status of Utah's population by planning district and county. The Southeastern planning district has the highest percent of persons in poverty (20.2%) of the State's seven planning districts. San Juan County has the highest percentage of persons in poverty (35.8%) of all Utah counties.

I consider the socioeconomic analyses found in the draft RMP/EIS to be seriously flawed because none of the five alternatives for managing about 1.8 million acres of public land and resources in San Juan County contain adequate analyses of the extremely favorable socioeconomic prospects that could result if current BLM WSAs and additional areas recommended for wilderness status by the Utah Wilderness Coalition were designated as such by the U.S. Congress under the Wilderness Act.

Wilderness designation and the measures recommended to promote tourism contained in the attached Appendix to these comments could result in substantially lowering the high levels of poverty in San Juan County where more than 1 of every 3 persons is living below the poverty level.

The Appendix, prepared by the author for the Utah BLM Statewide Wilderness Draft Environmental Impact Statement (1986), contains a critique of the BLM's narrow socioeconomic conception of wilderness and offers numerous recommendations to help realize the socioeconomic potential of increased tourism in the wake of adequately promoted wilderness designations. These comments are even more applicable to the draft RMP/EIS due to its virtually total neglect of the positive socioeconomic consequences of Congressional wilderness designation of BLM WSAs and other areas having outstanding natural values that are located in the San Juan Resource Area.

The socioecomomic sections of the draft RMP/EIS should be entirely rewritten to reflect the comments and concerns expressed above and those which can be found in much greater detail in the Appendix.

RESPONSE TO COMMENT 111 — J. DENNIS WILLIGAN

[Comment page 1]

The impacts of wilderness designations by Congress, including socioeconomic effects or the effects on tourism, were not considered in the draft. The planning criteria stated that the effects of wilderness designation would not be analyzed in the RMP/EIS; the planning criteria were finalized in 1985 after a public review period (see draft pages 1-10 and 5-9).

The suitability of WSAs in Utah for designation as wilderness, as well as the environmental impacts of wilderness designation, was considered in the statewide wilderness EIS [BLM, 1986] (draft page 1-3). See also the response to comment 13, Utah Wilderness Association, on this topic.

NOTE: A 22-page appendix submitted with this comment addressed concerns regarding the Utah statewide wilderness EIS; it is not reprinted here.

Change to the EIS? No.

COMMENT 112

HENRY G. WRIGHT
ATTORNEY AT LAW
P.O. BOX 2312
1911 MAIN AVENUE
DURANGO, COLORADO 81301
(303) 259-3202

October 28 1986

Ed Scherick
Bureau of Land Management
Box 7
Monticello UT 84535
Attention: RMP

Dear Mr. Scherick:

I wish to comment upon your Resource Management Plan for the San Juan Resource Area.

I have been a resident of Durango Colorado for about seven years, which is located only a little over an hour from the Utah border. I have been visiting Utah an average of 15-20 times per year. Almost all of these visits have involved going through your area, and in a very large portion of the visits my final destination has been in the San Juan Resource Area. I have carried out a wide range of recreational activities on your land, including sightseeing from my vehicle, four wheeling, photography, hiking, archaelogical observations & backpacking.

I feel very strongly that the land is literally priceless, and should be protected as much as possible. Accordingly, I would like to support Alternative D. The land is just to beautiful and awesome to squander for short term benefits for a few. I am very disappointed with your Alternative E which seems to provide only a very limited amount of protection.

Before I start my specific comments upon Alternative E, I want to make the general comment that your RMP was extremely hard to understand, especially in evaluating the exact differences between the alternatives. Having the Management Situation Analysis helped, as did my first hand knowledge of actual conditions in the field. Without this knowledge, a great deal of your RMP would have been incomprehensible. The lack of any clear maps which actually gave any sort of detail detracted from the RMP. I understand the budgetary problems as well as the necessity of using technical language at times, but still the RMP was very difficult to decipher.

In my opinion, the Alternative E fails to provide the necessary protection for the natural resources and cultural resources, and places an undue emphasis upon mineral & grazing activities.

I am especially disappointed by the failure to provide any form of administrative protection for the WSA's in Alternative E. At least Alternative D provides the limited protection of ONA. Your map at 2-29 seems to indicate that virtually no protection will be provided for such areas as Slickhorn Canyon, Johns Canyon, Lime Canyon,

RESPONSE TO COMMENT 112 HENRY G. WRIGHT

[Comment page 1]

BLM appreciates this comment, but notes that the public comment period was not intended to solicit votes for any alternative presented in the draft.

BLM acknowledges that the draft RMP/EIS is a complex document covering a complex area. A quarter-inch-to-the-mile map has been included with the proposed RMP.

BLM does not agree that alternative E unduly emphasizes mineral and grazing activities. See the response to comment 2 from National Parks and Conservation Association, comment page 31.

In the draft, several areas under wilderness review received protective designations under the preferred alternative. The special designations were not proposed for the purpose of protecting wilderness values. The proposed RMP would place special designations on many of the areas mentioned in this comment (see revisions to draft tables S-1, 2-6, 2-7; also refer to the map in this proposed RMP and final EIS). Several areas mentioned in this comment (Arch Canyon, Lockhart Basin, Alkali Ridge, and Hovenweep) are not part of the wilderness review.

Road Canyon, Fish & Owl Creek, Mule Canyon, Arch Canyon, Lockhart Basin, and a much smaller amount of protection for Alkali Ridge and around Hovenweep under Alternative E.

It is my personal opinion that the land not being protected is well worth protection. But, beyond my personal opinion, the opinions of the preparers of the BLM Wilderness Draft Environmental Impact Statement should be considered. How can an area be considered so outstanding that is meets the demanding criteria for wilderness designation, and yet be ignored for ONA designation? For that matter, Cheesebox Canyon & Mancos Mesa didn't even get considered for ONA even under Alternative D. For example, Cheesebox Canyon is considered to be entireley of Class A scenery (Vol 5, EIS, p. 14- Cheesebox Canyon) , and yet it fails to qualify for even as ONA under the RMP. The example could be repeated many times of the WSA EIS describing unique features of the WSA, and yet the preferred alternative fails to provide any sort of managerial protection for the land.

Likewise, the amount of portection provided under alternative E for cultural resources is also inadequate. The managerial protection provided for Montezuma Creek and Beef Basin are much smaller under Alternative E than under alternative D. Just from my own personal observation, both of these areas have a great number of sites which are well worth protection.

I am also very concerned about the overemphasis upon grazing activities in the plan. On a nationwide level, the surplus of beef would seem to indicate that the more marginal areas such as southeast Utah are unable to compete with more fetile areas of the midwest such as Nebraska, and I certainly resent the use of my tax dollars to subsidize the beef industry of Utah. The prime example of the misuse of funds is the so-called land treatments. The amount & scope of land treatments under Alternative E are simply outrageous. It would appear that most of Cedar Mesa with its rich archaelogical resources is going to be chained so that a few surplus cattle can be pastured for a few additional days. Considering the destruction of archaeological resources and natural habitat, I strongly protest the chaining of Cedar Mesa. I also note with special anger the proposed land treatments of the Dark Canyon plateau area and the region directly around Natural Bridges NM, not to mention the country around Hovenweep, an area which is especially rich with surface ruins.

On the subject of range improvements, the BLM has stated that Alternative D is more costly than the other improvements. The main factor for this cost is range improvements. Since alternative D basically allows for the return of natural plant succession, I am unclear as to the additional cost of range improvements. If anything, the place where I would expect a higher cost of range improvements would be Alternative A.

I am also very concerned about the Recreation Opportunity Spectrum Classes found at 3-67. It would appear that the entire area around Hovenweep and Montezuma Creek (in fact, just about everything to the east of Monticello & Blanding) will be considered to be Roaded Natural. Considering the great numbers of surface ruins both in the creek bottoms and mesa tops, unrestricted ORV activity could be disastrous, not only from the phyical problem of ORVs intentionally or unintentially driving over the sites, but also increased access for pothunting. Great areas of Cedar Mesa, Dark Canyon Plateau and lands adjoing Canyonlands NP are also going to be opened to ORV activity.

RESPONSE TO COMMENT 112 HENRY G. WRIGHT

[Comment page 2]

The draft (page 1-2) discusses management of WSAs and ISAs if Congress releases them from wilderness review without wilderness designation. It is assumed that if Congress takes such action, the areas are to be managed for nonwilderness purposes. Therefore, no attempt was made through the RMP to apply quasi-wilderness protective management to areas released from wilderness review, even those found to be preliminarily suitable for wilderness designation in the statewide wilderness EIS, or to manage wilderness values through protective designations.

BLM recognizes the need to protect cultural resources and is confident that the preferred alternative provides an adequate framework for management of cultural resources in SJRA. Commentor apparently refers to the areas in Montezuma Creek and Beef Basin proposed under alternative D for nomination to the National Register as an archaeological district (draft figures 2-10 and 2-11). The draft did not indicate that "managerial protection" would be withheld from relevant cultural resource sites; the preferred alternative provides for the management of sites eligible for nomination to the National Register, whether or not they are actually nominated or listed (draft page A-27).

Grazing use of public lands is authorized under the Taylor Grazing Act and FLPMA, and will be allowed to continue within the parameters of BLM's multiple-use mandate.

The potential land treatments shown in the draft are physically suitable areas, not proposed projects. The draft is revised to clarify this, and to indicate that priority would be given to maintaining existing land treatments (see revisions to draft pages 2-6 and 2-68). Under the proposed RMP, the special conditions for the Cedar Mesa and Hovenweep proposed ACECs would have to be met. NEPA documentation at that time would assess impacts to other resources (draft pages 2-1, A-1, and A-29).

The budget figures in the draft for the grazing programs were in error (see revisions to draft table 2-4 and appendix K; see also the response to comment 9, Southern Utah Wilderness Alliance, comment page 4, on this topic).

The ROS classes reflect the current situation (draft page 3-66 and figure 3-16). As noted in this comment, the majority of the eastern third of SJRA falls within the RN class criteria (draft table 3-10 and appendix F). Under the preferred alternative, ROS classes are one of many reasons behind ORV use classes (draft table 2-8). Under the preferred alternative as presented in the draft, ORV use would be limited or prohibited over the majority of Cedar Mesa, the Dark Canyon Plateau, and areas adjacent to NPS units (because of ROS classes, proposed ACECs, and seasonal wildlife restrictions). The proposed RMP would place additional ORV restrictions on the Hovenweep and Cedar Mesa ACECs, as well as other areas not mentioned in this comment (see the proposed RMP).

I do not mean to suggest that all ORV drivers are irresponsible; in fact I own both a 4wd truck and a dirt motorcycle. However, use of ORVs off of traveled routes invariably results in damage to both the soils and to vegetation under the best of circumstances which are very slow (if ever) in recovering. I would be much more comfortable with a more restricted ORV use areas. Even as a avid 4wd owner, there are more than enough "roads" to test my vehicle and nerves on. As a final note, if I read the map correctly, it would appear that Arch Canyon is opened to ORV use. Considering the nature of the canyon with its sensitive environment, I find such usuage to be outrageous. Again, there are innumerable creek bottoms to drive in southeastern Utah without opening this particular one to ORV use.

From the standpoint of wildlife, I am very concerned about the possible loss of habitat to desert bighorn sheep. In comparing the map at 3-43 (wildlife habitats) with land treatments under alternative E at 2-47, it would appear that a considerable amount of chaining is planned for desert bighorn habitat, especially on Cedar Mesa and on Dark Canyon plateau. This is a contradictory use of the land and without question the desert bighorn sheep are going to be the loosers.

In conclusion, I wish to thank you for considering my comments. It is my hope that you will revise your preferred alternative to more closely protect the land and its priceless resources.

Please inform me as to any future decisions of the BLM as to the RMP.

Sincerely,

Henry G. Wright
Attorney at Law

HGW/ps

RESPONSE TO COMMENT 112 HENRY G. WRIGHT

[Comment page 3]

Arch Canyon contains a county Class B road which cannot be closed by BLM. ORV designations do not apply to county roads.

In response to this comment and others that were similar, figure 2-15 has been revised to eliminate potential land treatments within the crucial bighorn sheep habitat (draft figure 3-11). As noted earlier, the draft indicated areas that are physically suitable for land treatments, not proposed projects. Impacts to other resources, such as bighorn sheep, would be assessed at the time a project was actually proposed. There is no crucial bighorn sheep habitat on Cedar Mesa (draft figure 3-11); potential land treatments in this area would not conflict with yearlong bighorn sheep habitat (draft chapter 4). No new land treatments are proposed on Dark Canyon Plateau (revised figure 2-15); however, existing seedings in this area may be maintained in the future.

Change to the EIS? Yes.

*U.S. GOVERNMENT PRINTING OFFICE: 1987-0-773-065/60051

Crucial Bighorn Sheep Habitat -
Use limited from April 1 to July 15 and October 15 to December 31

Crucial Antelope Habitat -
Use limited from May 15 to June 30

Crucial Deer Habitat
Use limited from December 15 to April 30

OPEN TO OFF—ROAD VEHICLES

SRMA

Transportation and Utility Corridors

Other Public Land

GRAZING EXCLUSIONS

CLOSED TO GRAZING (138,080 acres)

ACEC (#2, #4 (Grand Gulch only), #5, and #8)

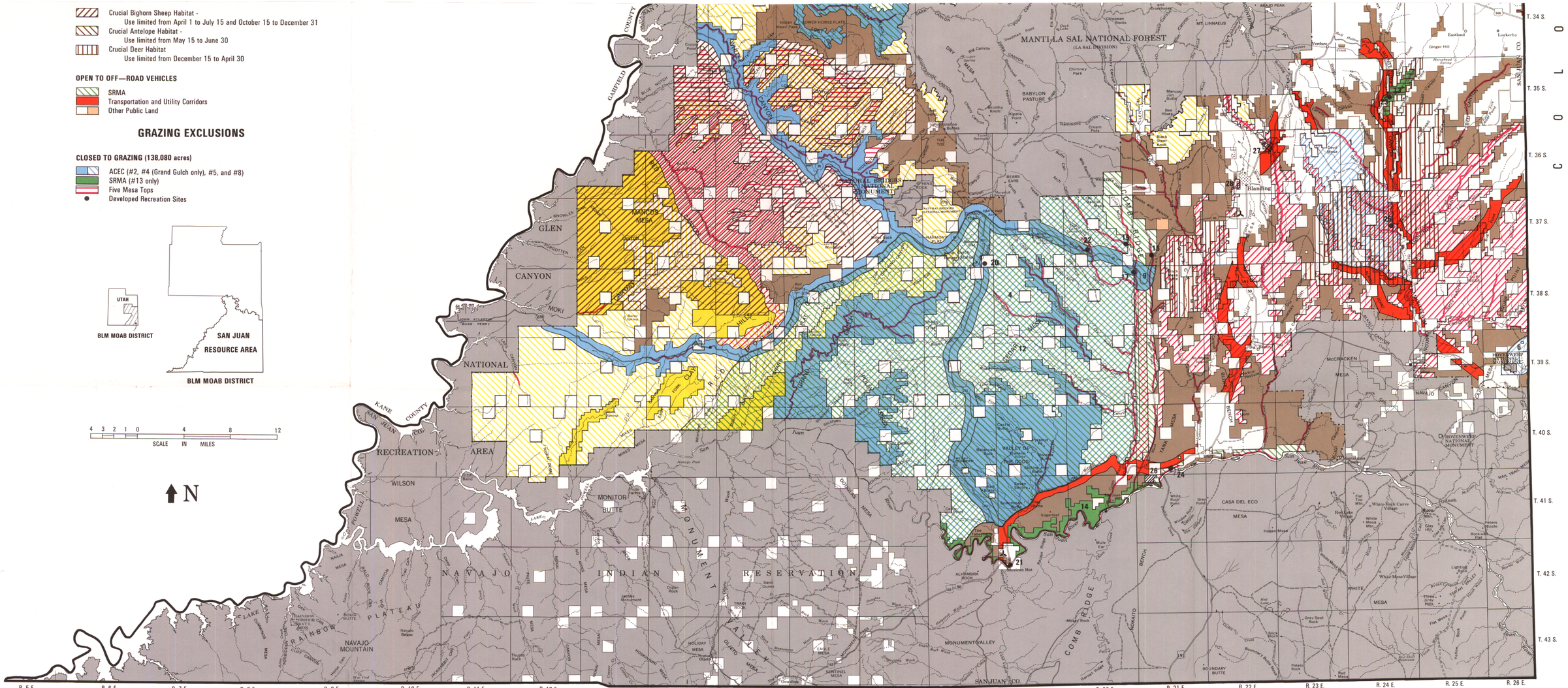
SRMA (#13 only)

Five Mesa Tops

Developed Recreation Sites

4 3 2 1 0 4 8 12
SCALE IN MILES

N



A R I Z O N A

U T A H

PUBLIC LAND USE ALLOCATIONS

SAN JUAN RESOURCE MANAGEMENT PLAN
SAN JUAN RESOURCE AREA

MOAB DISTRICT, UTAH
BUREAU OF LAND MANAGEMENT

CONDITIONS FOR USE

NO SURFACE OCCUPANCY AND CLOSED TO MINERAL ENTRY

- ACEC
- SRMA

NO SURFACE OCCUPANCY AND OPEN TO MINERAL ENTRY

- ACEC
- Primitive Recreation Opportunity Class
- Floodplain and Riparian/Aquatic Areas

SURFACE USE LIMITED BY SPECIAL CONDITIONS

- ACEC
- SRMA
- Semiprimitive Non-Motorized Recreation Opportunity Class
- Roaded Natural Recreation Opportunity Class
- Grazing Exclusions
- Sensitive Soils Areas
- Prior Land Leases

SURFACE USE LIMITED BY SEASONAL CONDITIONS

- Crucial Bighorn Sheep Habitat - Use limited from April 1 to July 15 and October 15 to December 31
- Crucial Antelope Habitat - Use limited from May 15 to June 30
- Crucial Deer Habitat - Use limited from December 15 to April 30

SURFACE USE WITH STANDARD CONDITIONS

- Use with Standard Operating Conditions

OFF—ROAD VEHICLE DESIGNATIONS

CLOSED TO OFF—ROAD VEHICLES

- ACEC
- SRMA (#14 only)
- Primitive Recreation Opportunity Class
- Roaded Natural Recreation Opportunity Class

LIMITED TO OFF—ROAD VEHICLES, DESIGNATED ROADS AND TRAILS

- ACEC (#4 and #6 only)
- SRMA (#13 only)
- Semiprimitive Non-Motorized Recreation Opportunity Class in SRMAs, and Adjacent Areas
- Developed Recreation Sites

LIMITED TO OFF—ROAD VEHICLES, EXISTING ROADS AND TRAILS

- ACEC (#1 and #10 only)
- Semiprimitive Non-Motorized Recreation Opportunity Class, and Adjacent Areas
- Floodplain and Riparian/Aquatic Areas

LIMITED TO OFF—ROAD VEHICLES, SEASONAL RESTRICTIONS

SPECIAL MANAGEMENT DESIGNATIONS

AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)

1. Alkali Ridge ACEC (35,890 acres)
2. Bridger Jack Mesa ACEC (5,290 acres)
3. Butler Wash ACEC (13,870 acres)
4. Cedar Mesa ACEC (323,760 acres)
5. Dark Canyon ACEC (62,040 acres)
6. Hovenweep ACEC (1,500 acres)
7. Indian Creek ACEC (13,100 acres)
8. Lavender Mesa ACEC (640 acres)
9. Scenic Highway Corridor ACEC (78,390 acres)
10. Shay Canyon ACEC (1,770 acres)

SPECIAL RECREATION MANAGEMENT AREA (SRMA)

11. Canyon Basins SRMA (214,390 acres)
12. Grand Gulch Plateau SRMA (385,000 acres)
13. Pearson Canyon SRMA (1,920 acres)
14. San Juan River SRMA (15,100 acres)

DEVELOPED RECREATION SITES

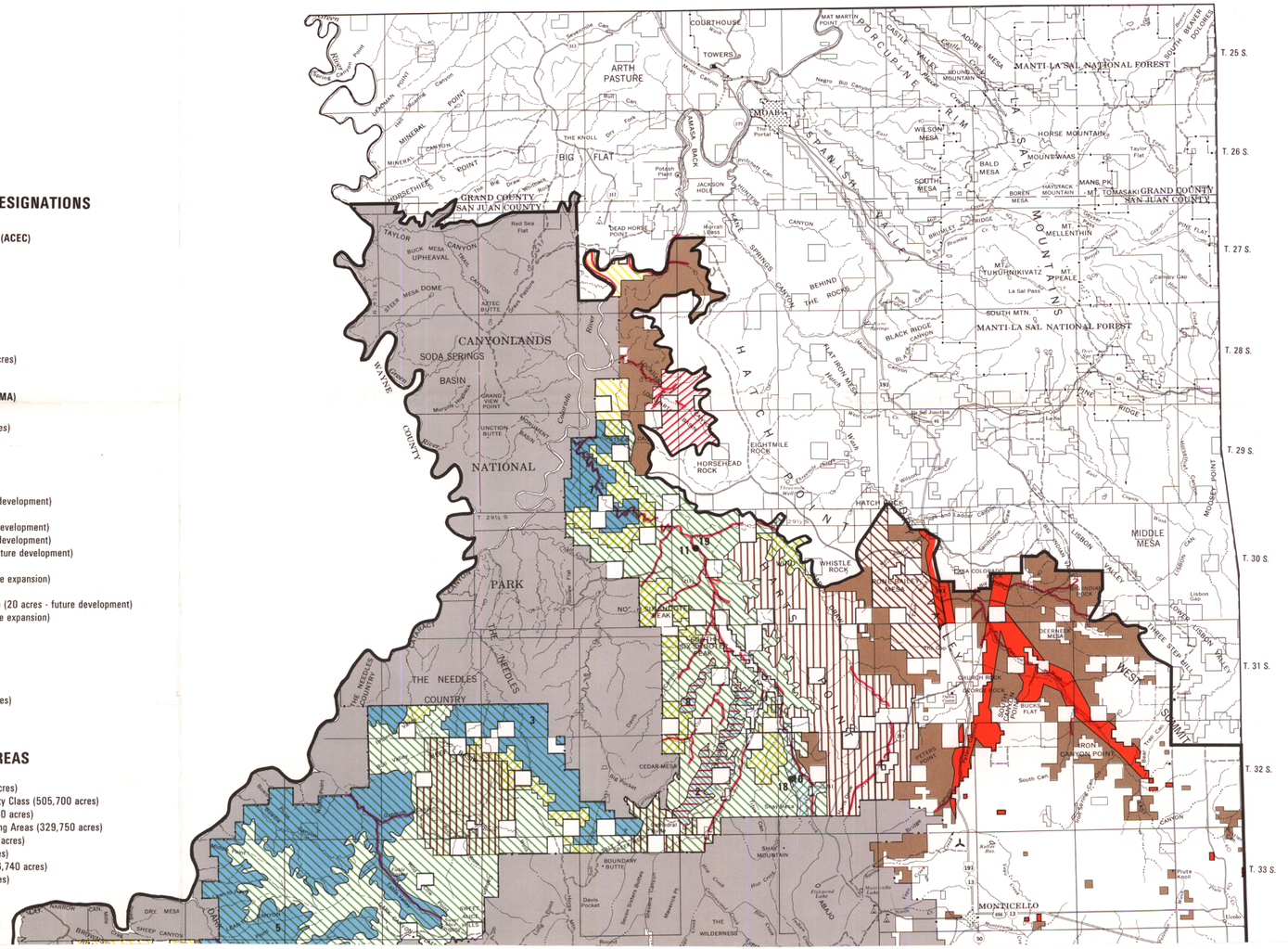
15. Arch Canyon Campsite (10 acres - future development)
16. Butler Wash Ruin (60 acres)
17. Comb Wash Campsite (10 acres - future development)
18. Indian Creek Campsite (20 acres - future development)
19. Indian Creek Falls Campsite (10 acres - future development)
20. Kane Gulch Ranger Station (40 acres)
21. Mexican Hat Launch Site (20 acres - future expansion)
22. Mule Canyon Ruin (10 acres)
23. Pearson Canyon Hiking Trail and Campsite (20 acres - future development)
24. Sand Island Campground (40 acres - future expansion)
25. Three Kiva Pueblo (10 acres)

PRIOR LAND LEASES

26. Bluff Airport Lease (400 acres)
27. Recapture Lake Lease (20 acres)
28. Blanding Education Center Lease (120 acres)

TRANSPORTATION AND UTILITY CORRIDORS

SPECIAL USE AREAS

- Primitive Recreation Opportunity Class (196,040 acres)
- Semiprimitive Non-Motorized Recreation Opportunity Class (505,700 acres)
- Roaded Natural Recreation Opportunity Class (9,430 acres)
- Crucial Bighorn Sheep Habitat - Lambing and Rutting Areas (329,750 acres)
- Crucial Antelope Habitat - Fawning Areas (12,960 acres)
- Crucial Deer Habitat - Winter Range (197,550 acres)
- Five Mesa Tops, Crucial Bighorn Sheep Habitat (56,740 acres)
- Floodplain and Riparian/Aquatic Areas (6,000 acres)
- Sensitive Soils Areas (195,000 acres)

NON-FEDERAL LAND