COMMENTS ON THE MONTICELLO FIELD OFFICE BLM
DRAFT RESOURCE MANAGEMENT PLAN AND
ENVIRONMENTAL IMPACT STATEMENT (NOVEMBER 2007)

Submitted by: Jean Binyon on behalf of the Glen Canyon Group of the Utah Chapter Sierra Club, 3057 E. Coyote Ct., Moab, UT 84532.

ABOUT THE GLEN CANYON GROUP, UTAH CHAPTER, SIERRA CLUB

The Glen Canyon Group was chartered in the year 2000 to participate in conservation issues within its boundaries, which include the following five counties: Carbon, Emery, Grand, San Juan and Wayne. Of the Group’s 160+ members, about 20-25 live in San Juan County, but almost all of our members visit the Monticello PA frequently to hike, camp, appreciate rock art and other cultural resources, sightsee, and bring visiting friends and relatives to experience your world class scenery. As one of four active Groups within the Utah Chapter Sierra Club, we are submitting Comments on the Draft RMP/EIS on behalf of the Glen Canyon Group.

A. GENERAL COMMENTS:

We are extremely disappointed that the Draft RMP/EIS fails to give due consideration to Non-WSA Lands with Wilderness Characteristics. Alternative E appears to have been an add-on. Nowhere in the entire document are the individual Lands--listed in Table 3.19 on pages 3-98 through 3-70, actually incorporated into any of the other action alternatives or land use decisions.

According to Appendix O, the current BLM Land Use Planning Handbook (H-1601-1, 2005) states that land use plans must:

- Identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics.

Table 2.1 The Summary Table of Alternatives beginning on page 2-20 illustrates the incredibly cursory attention that BLM devotes to Non-WSA Lands with Wilderness Characteristics. Goals and Objectives are provided as required, but only Alternative E provides the “management actions necessary to achieve these goals and objectives.” As noted on page 2-6, “There would not be specific prescriptions for wilderness characteristics under Alternatives A, B, C, or D.” Except for some indirect and incidental benefits accruing from other management decisions, the irreplaceable Non-WSA Lands with Wilderness Characteristics are thus completely dismissed.

Not only are the Non-WSA Lands with Wilderness Characteristics valuable in their own right, but Alternative E would also have beneficial effects for other values, as demonstrated in Section 2.2 Summary of Impacts. Examples of the beneficial effects of Alternative include:

- Page 2-67 CULTURAL RESOURCES/Cultural Resources: Same as Alternative B except additional beneficial impacts from protection of 582,357 acres of non-WSA lands with wilderness characteristics.

- Page 2-74 CULTURAL RESOURCES/Travel Management: Same as Alternative B except that 474,291 acres of high site-density lands would be beneficially closed to OHV use.
CULTURAL RESOURCES/Visual Resources: Long-term beneficial impacts on cultural resources from management of 565,528 acres of high site-density and 544,314 acres of medium site-density under VRM Class I and II objectives. Slightly higher benefit than Alternatives A and B. Adverse impacts to cultural resources from designation of 671,828 acres (least of all alternatives) as VRM Class III and IV.

HEALTH AND SAFETY/Health and Safety: Permitted standards and special minerals leasing on 43% of PA (much lower proportion than all other alternatives) would moderately reduce the potential risks to health and safety from minerals exploration and development activities.

LIVESTOCK GRAZING/Non-WSA Lands with Wilderness Characteristics: Long-term beneficial impacts to livestock grazing on 582,357 acres of non-WSA wilderness characteristics from no surface disturbances to vegetation, and no OHV disturbances.

PALEONTOLOGY/Non-WSA Lands with Wilderness Characteristics: Surface disturbance restrictions on 582,357 acres to protect non-WSA lands with wilderness characteristics would have greater beneficial impacts on sensitive resources than under Alternative A (as well as Alternatives B, C, and D).

RECREATION/Cultural Resources: Same as Alternative B except more beneficial impacts from surface disturbance restrictions on 18,514 (39%) of Comb Ridge from protection of non-WSA lands with wilderness characteristics.

RECREATION/Non-WSA Lands with Wilderness Characteristics: Long-term beneficial impacts on recreation resources and opportunities for non-mechanized, motorized scenic driving, and mountain biking groups from preservation of 165,831 acres for non-WSA wilderness characteristics within the SRMAs and CSRMAs and 416,357 acres within the ERMA. Long-term adverse impacts on competitive, motorized and mountain biking events in this area.

RIPARIAN RESOURCES/Non-WSA Lands with Wilderness Characteristics: Beneficial impacts to riparian resources from protection of wilderness characteristics on 582,360 acres from closure to minerals, OHV travel, ROW permitting and through management under VRM Class I objectives.

SPECIAL DESIGNATIONS/Special Designations: Impacts the same as Alternative B, except additional long-term beneficial impacts to ACEC relevant and important values from management of 109,206 acres of non-WSA lands with wilderness characteristics to protect wilderness values. River suitability recommendation impacts same as Alternative B with WSA impacts same as Alternative A.
Page 2-123 SPECIAL STATUS SPECIES/Non-WSA Lands with Wilderness Characteristics: Long-term beneficial impacts to species from restricted surface disturbances to habitat within 582,357 acres of non-WSA lands with wilderness characteristics.

Page 2-131 VEGETATION/Lands and Realty: Same impacts as Alternative B, except ROWs would be prohibited in non-WSA lands with wilderness characteristics, which would reduce long-term adverse impacts to vegetation more than any of the other alternatives.

Page 2-137 VISUAL RESOURCE MANAGEMENT/Scenic Quality/Viewshed: No scenic quality degradation because of management under VRM I for 1) 47,783 acres for Lockhart Basin ACEC, 2) 22,863 acres for Valley of the Gods ACEC, and 3) 8,540 acres for Indian Creek ACEC.

Page 2-139 WILDLIFE AND FISHERIES RESOURCES/Lands and Realty: Impacts same as Alternative B except that non-WSA lands with wilderness characteristics would also be excluded from ROWs for wind or solar energy exploration and development. Alternative E would be more beneficial to wildlife than all other alternatives since it prescribes more exclusions than any other alternative.

There are two ways in which Non-WSA Lands with Wilderness Characteristics could have been incorporated into Alternatives B and C.

**First:** Add those areas, most of which are less than 5,000 square feet, and which are contiguous to WSAs, Wilderness, and National Parks, into those boundaries. While the Monticello FO no longer has the authority to designate new WSA’s (page 1-6, also 3-67), it does have the authority to manage these important areas as wilderness “through the land use planning process.” (page 3-67) This option would not adversely affect such uses as mineral exploration, ROWs, recreation and travel management. As described in Table O.2 (pages O-4 through O-9), the following areas were found to be natural in appearance, an important criterion.

<table>
<thead>
<tr>
<th>AREAS</th>
<th>ACRES WITH W.C.</th>
<th>CONTIGUOUS TO:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arch Canyon 4</td>
<td>46</td>
<td>Mule Canyon WSA</td>
</tr>
<tr>
<td>Bridger Jack Mesa</td>
<td>564</td>
<td>Bridger Jack Mesa WC</td>
</tr>
<tr>
<td>Grand Gulch A</td>
<td>7,485</td>
<td>Grand Gulch ISA (Pine Canyon WSA)</td>
</tr>
<tr>
<td>Hammond Canyon</td>
<td>4,702</td>
<td>Grand Gulch ISA &amp; WC</td>
</tr>
<tr>
<td>Hatch Lockhart 3</td>
<td>1,765</td>
<td>WC</td>
</tr>
<tr>
<td>Indian Creek A</td>
<td>3,916</td>
<td>Indian Creek WC &amp; Canyonlands NP AE</td>
</tr>
<tr>
<td>Indian Creek Adjustment</td>
<td>26</td>
<td>Same as preceding</td>
</tr>
<tr>
<td>Road Canyon</td>
<td>163</td>
<td>Road Canyon WSA</td>
</tr>
<tr>
<td>White Canyon 8</td>
<td>381</td>
<td>Cheesebox Canyon WSA</td>
</tr>
<tr>
<td>White Canyon 9</td>
<td>1,238</td>
<td>Gravel/Long WCs</td>
</tr>
</tbody>
</table>

The **second** way in which the larger units could and should have been protected would be to set them aside for further study until such time as Congress acts on the Red Rock Wilderness Act. Also from Table O.2, these areas were all found to be natural in appearance AND to provide outstanding opportunities for solitude and primitive recreation. These Non-WSA Lands with Wilderness Characteristics are:
### AREAS

<table>
<thead>
<tr>
<th>Area</th>
<th>Acres with Wilderness Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lime Creek</td>
<td>5,556</td>
</tr>
<tr>
<td>Red Rock Plateau A</td>
<td>17,011</td>
</tr>
<tr>
<td>Shay Mountain A</td>
<td>6,708</td>
</tr>
<tr>
<td>Upper Red Canyon A</td>
<td>24,918</td>
</tr>
<tr>
<td>Valley of the Gods A</td>
<td>13,688</td>
</tr>
<tr>
<td>White Canyon</td>
<td>6,292</td>
</tr>
</tbody>
</table>

### BLM’S PREFERRED ALTERNATIVE

The Executive Summary contends that Alternative C was chosen as the so-called preferred alternative because it “would protect important environmental values and sensitive resources while allowing for commodities development. It would provide a balance between protection of important natural resources and commodity production, as well as offer a full range of recreation opportunities.” (page ES-4) In our view, BLM’s “preferred alternative” is not balanced and in fact abnegates their responsibility to protect the wilderness and cultural resources entrusted to their care in favor of satisfying the demands of off-rodgers and oil/gas interests.

It is our philosophy that a truly balanced decision will be of optimal benefit to the owners of these public lands—the people of the United States, and to future generations.

Some of the specific comments below will detail ways in which Alternative C should be better balanced.

### B. SPECIFIC COMMENTS:

#### MAPS:

- Map 28 showing the non-WSA lands with wilderness characteristics is vastly superior to the corresponding map in the Moab FO Draft RMP/EIS. Congratulations.
- Map 31 SRMAs puts Alternatives B and E on the same map—a telling feature.
- Map 44 ACECs also puts Alternatives B and E on the same map.
- Comparing Maps 44 and 45 makes it immediately clear that Alternative C is very deficient in management of these areas for critical environmental concern.
- Map 82 showing the overlap between WSAs and ACECs puts both Alternatives B and E on the same map, again a helpful comparison.
- Comparing Maps 82 (B & E) and 83 (C) again makes it abundantly clear that C protects virtually nothing (i.e., only one area) beyond what the BLM is absolutely required to do.

#### CULTURAL RESOURCES

The unique and irreplaceable cultural resources in the Monticello PA should rank along with wilderness as major priorities of this plan. Consider the following prescriptions:

- Where BLM policy regarding OHV use conflicts with requirements of the National Historic Preservation Act, Section 106, (page 1-5), resolution of the conflict should favor the NHPA.
- Since most of the 28,000 cultural sites thus far documented within the PA were identified under Section 106 for other land uses (page 3-17), it is incumbent upon the BLM to conduct a comprehensive overview of these known sites.
- The Utah State Historic Preservation Office estimates that less than 10% of all BLM lands within the Planning Area have been subjected to intensive cultural resource inventories. (page 3-18). In addition to proceeding with the comprehensive overview noted above, BLM should immediately develop a cooperative process to conduct surveys and inventories.
o Hovenweep ACEC “has high scientific, public, and conservation use values” (page 3-21). Alternative C should include the stipulation that Hovenweep cultural properties eligible for the National Register of Historic Places will be avoided as necessary to provide permanent protection. (page 2-39)

o The Lockhart Basin ACEC should be designated by Alternative C to protect cultural resources from impacts of mineral leasing, livestock grazing, OHV use and degradation of visual resources.

o No high-density cultural areas should be designated VRM III and IV under any alternative.

OIL AND GAS

In several regards – timing limitations, controlled surface use, and no surface occupancy, Alternative A is superior to the C in prescribing stipulations for oil and gas. (Table ES6 on page ES-7) Under A, 73 wells would be drilled compared to 74 in C. Corresponding numbers for the other alternatives are: B – 66, D – 75, and E – 54. (The same table contains a confusing acronym “LOP,” apparently meaning Life of the Plan, and use of the term “areas” in footnotes apparently meaning acres.)

Significantly, half or over half of these leases which are likely to be drilled within the next 15 years are within non-WSA lands with wilderness characteristics—under A: 37 wells of the 73, disturbing up to 355 acres; B: 38 wells, 365 acres; C 39 wells, 374 acres; and D: 39 wells, 374 acres. (Pages 4-163 through 4-170). Under E, there are existing leases in the following non-WSA lands with wilderness characteristics: Harts Point, Indian Creek, Fish and Owl Creeks, Grand Gulch, Hammond Canyon, Harmony Flat, Lime Creek, Valley of the Gods, Cross Canyon, and Squaw and Papoose Canyon. Since it is assumed that 9.6 acres are disturbed for every well drilled, it is fervently hoped that any wells drilled in these existing leases will have the strictest stipulations.

The long lists of 1,135 active and inactive, 480 abandoned, and 1,652 other wells on pages 3-49 through 3-52 demonstrate that the PA has already been subjected to extensive exploration, leasing, development and production. If we compare Maps 14 and 15, we readily see that most of the region with high development potential already contains many current leases. Pending leases are largely within the regions of low and moderate potential. Why then are so many new leases and new wells being projected?

OTHER COMMENTS

o Regarding Table ES1 (page ES-5) OHV Categories (acres) by Alternative: How can the total of acres under the No Action Alternative A be over 2.2 million acres when less than 1.8 million acres is managed by BLM? Adding footnote 3 under Summary Table A on page 2-3 would clarify the matter.

o Regarding Table ES2 (page ES-6) Designated Routes: The heading should be Miles, not Areas Limited to Designated Roads and Trails.

o Summary Table A on page 2-3 should note that the “Miles of Routes Designated” are D roads only. The totals for Alternatives C and D are incorrect.

o Prescriptions for Alternative C: 1) Special Recreation Permits, page 2-31, should close Arch Canyon to OHV use as B and E do; should limit Balloon Fest; and should limit commercial hiking tours. 2) Bridger Jack Mesa (Mesa Top), page 2-36, should manage as an ACEC; should be closed to OHV use. 3) Butler Wash North ACEC, page 2-37, should designate Scenic ACEC per Alt. B or an ACEC for Scenic Values per Alt. A. 4) Dark Canyon ACEC, page 2-39, should be designated a Scenic and Wildlife ACEC, or at least
manage as VRM Class I. 5) Hovenweep ACEC, page 3-21, should include note on cultural properties eligible for National Register per Alt. B. 6) Lockhart Basin ACEC, page 2-42, should designate a Scenic ACEC and maintain VRM Class I. And 7) Permits for the Cedar Mesa Cultural SRMA on pages 2-25 and 2-26, should be limited to a total 25 people for day trips and overnight camping, per B & E.

- GLOSSARY in Volume 3 should include many definitions from Attachment B to Appendix N, namely definitions for: Designation, Emergency limitations or closures, Mechanized travel, Motorized travel, and Non-motorized travel. Additional definitions should be added for: Road, Trail, and Route.

Finally, we want to say that we take seriously your mantra: “Your Land . . . Your Future . . . Your Ideas. We genuinely hope that your apparent rush to judgment and your obvious drive to make final decisions under the current federal administration do not blind you to your vital responsibility to protect these lands for future generations.

Thank you for your attention.
Jean W. Binyon