COMMENTS REGARDING THE MOAB FIELD OFFICE BLM: DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT (AUGUST 2007)

Submitted by: Jean Binyon on behalf of the Glen Canyon Group, 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, comprised by the following five counties: Carbon, Emery, Grand, San Juan and Wayne. Just over two-thirds of the Group’s 160+ members live in Grand and northern San Juan Counties, the area covered by the Moab Field Office. 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 in the knowledge that the Utah Chapter will also submit Comments.

ABOUT THE DRAFT RMP/EIS & PROCESS

The Draft is comprehensive but extremely complicated and not well cross-referenced. We recognize that a great deal of work was required to produce the Draft, and regret only that the Comment period is so short. Since eight months were allowed for the scoping process, it is still hoped that a similar amount of time will be allotted for this review and comment period. In the event that—as we’ve requested, an extension is granted, we will amend, extend and resubmit our Comments.

We do not view the process as a “numbers game.” It is not a competition involving two or more sides to impose their will or to win a Record of Decision favorable to their interests. Rather, 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.

A. GENERAL COMMENTS:

The Executive Summary concludes that Alternative C was chosen as the preferred alternative based on: 1) Balance of use and protection of resources, and 2) Extent of the environmental impact. (Page ES-8) In our view, BLM’s “preferred alternative” is not balanced and in fact abnegates their responsibility to protect the resources entrusted to their care in favor of satisfying the demands of off-roaders and oil/gas interests. As for “extent” of impact, the Draft RMP/EIS demonstrates that the Conservation Alternative (B) would produce less total impact on the environment and definitely fewer adverse impacts than C.

Labeled as the major issue identified during the scoping process was “ISSUE 1. — RECREATION USE AND OHVs -- How can increased recreation use, especially motorized vehicle use, be managed while protecting natural resource values?” The RMP/EIS does not address both parts of the question. It is not balanced. A balanced plan would look to the future with protection as the primary aim, would listen to all legitimate voices, and would actually manage—not just recognize, the use, overuse, and abuse of natural resource values. A balanced plan that would be easier to decide and easier to defend, would be one that does the right thing—it upholds and holds fast to the paramount goal: Quality Environment.
• **QUIET USERS NOT CONSULTED**

We are dismayed that the Travel Management Plan has so many miles of road that the roads cannot be adequately patrolled or monitored by the BLM staff. We are also dismayed that although Grand County was closely consulted on all road decisions, BLM was aware that the County representative, Jerry McNeely, was consulting only with the motorized users and not with the "quiet" users. We feel totally disenfranchised from the process of selecting open and closed roads. A balanced travel plan is not developed by just consulting with OHV drivers.

As shown on Table 8 of Appendix G (pages G-20 and G-21), numerous routes and segments of routes were added to the database, but BLM completely rejected the recommendations of the Red Rock Heritage Travel Plan on the excuse that there are conflicts with Grand County’s road inventories.

BLM even failed to examine the information available to them in draft form from the National Visitor Use Monitoring study conducted by the MFO in FY 2006, which described numbers, motives, likes and dislikes and other characteristics of quiet users—hikers, bikers, boaters, and visitors driving for pleasure.

• **TRAVEL MANAGEMENT PLAN not TRAVEL PLAN**

During the past 20+ years, while the MFO staff was operating under the existing RMP for management and permitting, the power and maneuverability of new OH Vehicles has greatly expanded and the sheer number of users has exploded. These "new" vehicles, powerful rockclimbers, ATV's and motorized trail bikes (motorcycles) are just the "tip of the iceberg" in numbers, power and range of OHV machines and demands of their users in years to come. BLM must be much more proactive in this Travel Management Plan, and anticipate the next two decades of motorized recreation. This RMP is the perfect time to actually put some "teeth" into what BLM refers as a Travel Management Plan, but which appears to be just a Travel Plan. The Final RMP should do more than state where vehicles can go and where they can't go—it needs to provide meaningful management and enforcement. BLM should include in the Travel Plan the possibility of permits and temporary and permanent closures throughout the MFO area.

BLM has proved over the past 5 years of the Easter Jeep Safari that they can both monitor usage and manage travel. They set up a monitoring plan with specific goals and objectives, with before and after examination of effects over a 10-day period of high road usage. As they analyzed the results, they instituted one-way travel, exclusive use (ie permitting) and educational tools for keeping vehicles where they are permitted. This experience should be used as a model for monitoring the designated roads in this RMP.

• **USING SCOPING COMMENTS to develop Travel Plan**

As reflected in the Scoping Process Report, 2004, the great majority of those sending letters and e-mails called for restrictions on OHV travel, for unambiguous designation “on the ground,” education of users, for closing unnecessary routes, and monitoring and enforcement. A small minority asked for increased access, playgrounds and open areas, and for no closure of routes, tracks and trails.

Similar sentiments were found in a survey of Grand County residents in February of '05 regarding tourism and off-road vehicle (ORV) activities. The poll showed that 63.5% of residents thought tourists were bothered by ORV activity. Forty percent thought that tourists came to the area for non-ORV recreation; 44.5% thought tourists were evenly divided between motorized and non-motorized sports enthusiasts, while only 6.5% thought most tourists came primarily “to play in an off-road vehicle.” (“Results announced from local survey,” *Moab Times Independent* 3/3/2005)
• IMPLEMENTATION and PROJECT PLANNING

What about the future? BLM defers modifications/adjustments of designated routes until “implementation and project-planning” phases through “a collaborative process involving local governments and the public. The impacts to travel management would be beneficial in the long-term because potential travel-related resource use conflicts would be identified and satisfactorily resolved since the route modification process would include interested and/or concerned stakeholders.” (Page 4-405) Need we remind the BLM that this approach was tried and failed. Although carefully constructed for proportional representation of all relevant segments of the community, the County’s Access Committee was finally dissolved as the members were unable to reach a consensus on anything. BLM needs to reconsider its approach, perhaps going to a public hearing and appeal process or a mediated decision-making process.

We could raise similar questions regarding the confusing Table 4.126 OHV Designations by Alternative on page 4-409. The table which contains both acres and miles has four footnotes, of which the second is not referenced in the table itself. “These are the miles of designated routes at time of EISA publication. After the issuing of the ROD, minor adjustments may be made by the MFO to more accurately define the designated routes.” BLM should let us know where the superscript belongs in the table, what the definition of “minor” is, and how the public will be involved.

• OUR FOCUS

Given the short timeframe and our Group priorities, we will place most of our focus on the Issue 10 identified during the Scoping process: “NON-WSA LANDS WITH WILDERNESS CHARACTERISTICS. How should non-WSA lands with wilderness characteristics be managed?”

In our review of many chapters, sections, appendixes, tables, and maps in the Draft RMP/EIS, we came to the conclusion that BLM has little intention of protecting wilderness values. It appears that by using several different management terms to split Non-WSA Lands with Wilderness Characteristics into different management areas, BLM has little desire to see these clearly eligible lands designated as Wilderness by the United States Congress.

On page 4-144, it is stated that “Because Alternative C does not propose specific management to protect non-WSA lands with wilderness characteristics contiguous to WSAs or National Park Service lands, there would not be expanded opportunities for solitude and primitive forms of recreation afforded to the WSAs or National Park lands.” This admission is shortsighted and neglectful of Wilderness possibilities within the MFO. Again, it appears that by discounting some of the best possibilities—those which are contiguous to already protected areas, BLM is purposely ignoring any lands that have the potential to be named as Wilderness by the US Congress. Those lands which are contiguous to existing WSA’s could act as a buffer to protect the WSA’s from vehicle incursions.

Lest we forget, wilderness on these public lands in Utah belongs to all Americans. Recently 93 members of Congress sent a letter to Interior Secretary Dirk Kempthorne “urging the federal government to ban OHV use in these areas to protect Utah’s exceptional archaeological and wilderness resources by immediately protecting wilderness character areas from off-road vehicle use.” And these members of congress are concerned that what happens in Utah could become the model for what happens elsewhere. Those who signed the letter emphasized that these lands are a national treasure, not a state or a provincial issue.

Although he did not sign the letter, a spokesperson for Utah Representative Jim Matheson said that BLM officials were aware of his views on the topic, adding, "The damage to public
lands from inappropriate OHV use is pretty widespread.” (“93 sign House letter urging ban on off-highway vehicles in Utah wilderness” The Salt Lake Tribune, 10/31/2007)

- OUR VIEWPOINT

  We believe that the “Conservation Alternative” (Alternative B) comes closest to protecting this “national treasure” and thus provides the best starting point for developing the optimal Resource Management Plan. We offer questions and critiques which we expect will be addressed in the Final Plan. And we recommend changes to both Alternatives B and C which need to be in the Record of Decision (ROD).

As stated on pages ES-4 and –5 of the Executive Summary:

  Alternative B would offer more protection for wildlife and other natural resources, and favor natural systems over commodities development. It would emphasize the protection of natural resources and landscapes as well as non-motorized recreation.

  Under Alternative B, zero acres would be open to cross country OHV use, 347,424 acres would be closed, and OHV use would be limited to designated routes in the remainder of the planning area. Approximately 2,144 miles of travel routes would be designated. Under Alternative B, eleven SRMAs would be designated, and 22 Focus Areas for particular types of recreation would be established.

  Fourteen ACECs would be designated under this alternative, and 28 segments of 12 eligible rivers would be recommended as suitable for WSR designation. Approximately 266,485 acres of non-WSA lands (in 32 areas) would be managed to maintain their wilderness characteristics. About 671,444 acres would be closed to oil and gas leasing. About 342,931 acres would be managed with no surface occupancy (NSO) stipulations, and 264,344 acres would be open with standard stipulations. The remaining 543,751 acres would be managed with timing limitation or controlled surface use stipulations.

As for environmental consequences, Page ES-8 concludes:

  Alternative B would have the least potential to adversely impact physical and biological resources and would protect a variety of vegetation types and wildlife habitats. Alternative B would be the most restrictive to resource extraction. Consequently, Alternative B would have the greatest potential for short-term adverse impacts to local economies and businesses that depend on public land for resource extraction.

B. SPECIFIC COMMENTS:

Non-WSA Lands with Wilderness Characteristics

CHAPTER THREE: AFFECTED ENVIRONMENT

Re: Section 3.9, Pages 3-63 thru 3-66, Tables 3.16 and 3.17, Map 2-24-B, and Appendix P

COMMENT: These pages describe the process and rules used to identify and map the acres in question. Despite conflicts and controversies, the history of such considerations have culminated in the current BLM Land Use Planning Handbook (H-1601-1, 2005), which 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. (Appendix P)

It appears that the final list of Non-WSA Lands with Wilderness Characteristics was compiled from several sources. The following correspond closely or are identical in size to those in the 1999 Wilderness Inventory, revised 2003: Beaver Creek, Desolation Canyon, Floy Canyon, Flume Canyon, Granite Creek, Harts Point, Hatch Wash, Hunter Canyon, Labyrinth Canyon, Lost Spring Canyon, Mary Jane Canyon, Mill Creek Canyon, Negro Bill Canyon, Shafer Canyon, Spruce Canyon, and Westwater Creek (Table P1).

Others were proposed by the BLM Interdisciplinary review team, namely: Arches Adjacent, Big Triangle, Dead Horse Cliffs, Dome Plateau, Hatch/Lockhart/Hart, Hell’s Hole, Hideout Canyon, Horsethief Point, Mexico Point, and Yellow Bird (Table P.2). Apparently Morning Glory and Porcupine Rim areas were combined with Negro Bill Canyon, and Diamond Canyon became part of Coal Canyon, but it is not clear how the final acreage and boundaries were determined for: Behind the Rocks, Coal Canyon, Fisher Towers, Goldbar, Gooseneck, and Westwater Creek.

Above all, it is not explained how the title “Non-WSA Lands with Wilderness Characteristics” was arrived at. Wilderness Character is a stronger term than Wilderness Characteristics and is preferable. Most of these lands disappear partially or entirely into SMRA’s, ERMA’s, and/or ACEC’s and the management protocols of these areas do not explain how their wilderness character/characteristics will be preserved, as required by the Handbook, i.e., "avoid or minimize impacts to wilderness characteristics".

Map 2-24-B Volume 3 shows WSA’s in faint dots and Areas with Wilderness Characteristics in brighter dots and bold outlines. But they are not identified. It would have been easy to put the names of the designated areas on the map, as was done with other maps. (See, for example, Map 2-4 Grazing Allotments.) This very important map must be printed on an 11x14 inch page with all areas clearly identified.

In addition to this overall map, there should be individual maps of each Non-WSA Land with Wilderness Characteristics showing their boundaries and the portions of each which would be covered by SMRA’s, ERMA’s and ACEC’s, and clearly showing the overlaps, as well as portions which are outside these proposed management designations. Include them in the Final RMP/EIS.

Finally it should be noted that, according to Section 3.9.2, Page 3-65, these lands are currently managed in accordance with existing land use plans, per the no-action alternative or Alternative A. Frankly, it is hard to accept the fact that having identified over 30 areas comprising hundreds of thousands of acres with wilderness characteristics in the 1990's (published in 1999), and having spent untold amounts of money in employee time and operating costs to identify and verify these areas, BLM professes to have made no efforts to protect or preserve these lands. As summarized in Chapter 2, Table F, Page 2-6, zero areas are being managed to maintain wilderness characteristics. This is reiterated in Table 2.1 on Page 2-16 which states “Non-WSA lands with wilderness characteristics were not addressed in the 1985 Grand RMP, as amended. These lands are managed according to the 1985 RMP prescriptions.” In other words, since there were no “prescriptions” in 1985, BLM apparently felt no obligation to manage
them appropriately once they were identified. Currently some of this land, identified as having WC has been degraded over the years with the increased use of OHVs.

CHAPTER FOUR: ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVES--Non WSA Lands with Wilderness Characteristics

Re: Impact of Lands and Realty Management Decisions—Section 4.3.8.2.3, Pages 4-113 to 4-117, Table 4.48, Pages 4-114 and 4-115

COMMENT: Table 4.48 makes it clear that Alternative B would exclude all 32 areas from Rights of Way (ROW) being established under the rubric of Lands and Realty Management Decisions. Under Alternative C, however, only a fourth of the Beaver Creek area would be excluded from ROWs. The rest of Beaver Creek and all of the remaining areas would be ROW “avoidance.” In all areas except Gooseneck, Mill Creek Canyon, and Shafer Canyon, the number of acres of avoidance is less than the total acreage with wilderness characteristics. The text does a poor job of explaining what happens to the remaining acreage which would presumably be open to powerlines, pipelines, and other utility corridors. In order to provide protection of these wilderness characteristics, Alternative C must either provide exclusion or at least avoidance of such intrusions except in very special cases when public input would be required and special stipulations would apply.

We noticed in the Executive Summary that “rights of way” covered more than these utility corridors, per the sentence “Other land uses within the planning area include rights-of-way (ROWS) for roads, pipelines, powerlines, and communication sites, film permits, and livestock grazing.” (page ES-7) The Glossary similarly includes roads in the definition of ROWs. The Final RMP/EIS should convey the more restrictive definition from the Lands and Realty sections.

Re: Impacts of Mineral Resources: Oil and Gas—Section 4.3.8.2.5.1 Pages 4-117 to 4-129.

COMMENT: Table 4.53 on pages 4-120 through 4-123 of Leasing Stipulations is very misleading in that it lists all Non-WSA areas as “closed” under Alternative B. However, quite a few of these areas contain portions which are currently leased—Arches Adjacent, Coal Canyon, Dead Horse Cliffs, Dome Plateau, Floy Canyon, Flume Canyon, Goldbar, Hatch Wash, Hatch/Lockhart/Hart, Hells’ Hole, Hideout Canyon, Horsethief Point, Hunter Canyon, Labyrinth Canyon, Lost Spring Canyon, Mexico Point, Shafer Canyon, Spruce Canyon, Westwater Creek, and Yellow Bird. The Plan should include the number of leases per area and not just the acreage. As shown in Tables 4.49 through 4.52, over half of the acreage is leased in several of these, namely Coal Canyon (62%), Floy Canyon (86%), and Hells’ Hole (68%).

As a result of current leases, an estimated 6 wells could be drilled per year and a total of 104 could be drilled in 15 years in Non-WSA Lands with Wilderness Characteristics. If, as is stated on page 4-119, 15 acres are disturbed by drilling each of these wells, this is a potential total of 1,560 acres of largely non-reclaimable impacts. However, it is good to know that leases which are not developed or held in production will expire after 10 years under Alternative B. Presuming that the 10-year “clock” began running at the time of initial lease, the plan should include information on each current lease in each of the areas listed above, and the year that lease was granted.
There are no such assurances regarding future leasing under Alternative C. BLM should improve their “preferred alternative” by reducing the acreage designated Standard stipulation and increasing or stipulating No Surface Occupancy in Coal Canyon, Desolation Canyon, Dome Plateau, Floy Canyon, Hatch Wash, and Lost Spring Canyon. We would like to see Behind the Rocks, Fisher Towers, Goldbar, Hunter Canyon, Labyrinth Canyon, Mary Jane Canyon, Mill Creek Canyon, Negro Bill Canyon, and Shafer Canyon closed to leasing. (We have noted that some of the areas which should be closed are projected by BLM to be low probability for drilling, but when these leases expire, no new leases should be granted in these sensitive and popular areas.) Since BLM cannot predict the invention of new techniques for extraction of oil, gas and minerals, areas which do not have existing leases should be closed now, while there is no interest in them, to protect them in the future.

Re: Bottom third of page 4-129 and first paragraph on page 4-130

COMMENT: We cannot determine where this summary referring to Oil and Gas (Section 4.3.8.2.5.1) belongs. If it is intended to come before, not after Section 4.3.8.2.5.2 Coal-bed Methane, then the numbers of wells to be drilled in one and 15 years under each alternative, and the amount of acreage disturbed do not correspond with Table 4.52 on page 4-119. This should be corrected or clarified in the Final RMP.

Re: Section 4.3.8.2.5.4 Salable Minerals, Pages 4-130 and 4-131

COMMENT: Alternative C should echo Alternative B regarding development of the sand and gravel, building stone and clay sites in Horsethief Point and Behind the Rocks. As shown on maps 3-9 and 3-10 in volume 3, there are many sources of these materials in the Moab Planning Area, and there is no reason to disturb these areas.

Re: 4.3.8.2.5.5 Locatable Minerals (Uranium & Vanadium) Page 4-131

COMMENT: Map 3-6 displays the presence of uranium/vanadium deposits with development potential. Few permitted mines are shown on the map (mostly in San Juan County), but apparently there are many “prospects” for mines. Although eight of the lands in question are located within areas of moderate potential, there are existing claims in only two of them—Beaver Creek and Goldbar. But there are existing claims in an additional four areas—Floy Canyon, Dome Plateau, Hatch/Lockhart/Hart and Hatch Wash. The Map should display the locations of existing claims.

Under all alternatives, such mines should not be permitted in Non-WSA Lands with Wilderness Characteristics as they are not permitted in Wilderness Areas.

Re: 4.3.8.2.6 Impacts of Decisions, 4.3.8.2.6.2 Alternative B, and 4.3.8.2.6.3 Alternative C, Pages 4-132 to 4-133

COMMENT: Eight prescriptions are provided. The first should be “Visual resource management (VRM) no lower than Class II (See comments regarding Table 4.55 on pages 4-154 through 4-156). Alternative C provides similar prescriptions only for Beaver Creek, Fisher Towers and Mary Jane Canyon. These prescriptions should also apply to other popular hiking attractions for local residents and tourists alike. To increase avoidable impacts, Alternative C should specify ROW exclusion, not just avoidance.
SMRA

Re: 4.3.8.2.8 Recreation Decisions—SRMAs, Pages 4-134 to 4-138; also, Volume I, Chapter Two, Table 2.1 Pages 2-2-18 to 2-29

COMMENT: This Resource Management Plan establishes six new Special Recreational Management Areas, and replaces the existing Colorado River SRMA with two SRMAs, all of which supplement the two others already in existence—Canyon Rims and Cameo Cliffs (both in San Juan County). The overall management plan described on page 2-18 and corresponding maps 2-8-B and 2-8-C seem well thought out but much too general. Since all of 21 Non WSAs Lands with Wilderness Characteristics and portions of seven others are subsumed within SMRAs, it is imperative that their management needs be specifically and separately addressed. This is particularly important since, as stated in line 29 of page 2-18 “Where a specific RMZ (or Focus Area) is not identified within an SRMA, the focus of that area is motorized, backcountry touring on designated roads.” Why not make it Non-motorized? We are greatly concerned that hiding most of the Non-WSA Lands with Wilderness Characteristics within Special Recreational Management Areas will essentially result in their annihilation.

Re: The Bookcliffs SRMA.

There’s an inconsistency in the RMP/EIS making the Bookcliffs SRMA a non-mechanized focus on page 2-18 (Alternative B) and non-motorized per page 4-135? We see no reason for Alternative C to designate the Bookcliffs an Extensive Recreation Management Area (ERMA) rather than a SRMA since—according to Chapter four, specific management would be the same, and since BLM would avoid having to amend the Plan at a later date to accomplish this change. (page 4-136 and 4-137)

Re: Canyon Rims SRMA, Focus Area: Scenic Driving Corridors on page 2-19:

Defining widths of corridors from the centerlines—rather ¼, ½, or 1 mile is arbitrary. These corridors should be based on the unique values in each area, including terrain, visibility, and line of sight of scenic vistas.

Re: Colorado Rivers SRMA:

Alternative C should be expanded to include the entire Top of the World area (page 2-20) and should protect all 12,510 acres of Negro Bill Canyon as a day-use only area set aside for a hiking and ecological study focus. (Alternative C protects only 8,684 acres--page 2-21.) Boating Management: Alternative C should be the same as Alternative B in stating “No restrictions on private use would be established unless unacceptable resource impacts occur” (page 2-22) in order to ensure that BLM does not restrict its future management options.

Re: Dolores River Canyons SRMA.

Boating Management: Alternative C should be the same as Alternative B in stating “No restrictions on private use would be established unless unacceptable resource impacts occur” (page 2-22) in order to ensure that BLM does not restrict its future management options.
Re: Labyrinth Rims/Gemini Bridges SRMA:

Defining widths of scenic driving corridors from the centerlines—rather ¼, ½, or 1 mile is arbitrary. These corridors should be based on the unique values in each area, including terrain, visibility, and line of sight of scenic vistas.

Alternative C should establish the Tenmile Hiking and Equestrian Focus Area as is currently in Alternative B in order to protect riparian and cultural resources and to keep motorcycles out of Trough Canyon and other side canyons. There are many undocumented cultural resources in Tenmile. BLM must close Tenmile to motorized uses to ensure the protection of these cultural resources. (page 2-24)

Gemini Bridges is a world-class arch, one of the best outside the National Parks. Protect it by outlawing all vehicles on the bridge itself. Close and restore damaged lands in the Canyon under Gemini Bridges. (page 2-25)

Dee Pass (Alternative C): The Section 106 cultural resources inventory should be done before, not after, designation as a motorcycle/ATV “specialized sport venue,” in order to protect all eligible sites. This should apply to existing and new routes as well as granting permits for competitive events. (page 2-25)

Re: South Moab SRMA:

We are glad to see Trail Mix recommendations incorporated in Alternatives B & C. (pages 2-26 and 2-27)

Non-mechanized recreation: Steelbender and Pritchertt Canyon should be one-way in order to prevent trail widening and damage to vegetation. (page 2-27)

Hidden Valley Trail should be hiking only, to avoid erosion and user conflicts. The Trail is not really conducive to bicycling. This is a favorite hiking trail for visitors and should be maintained solely for tourists and local hikers. (page 2-27)

Re: Two Rivers SRMA:

Boating Management: Cisco Landing to Dewey Bridge: Alternative C should read same as Alternative B on private use, i.e., “For private use, no restrictions on amount of private use would be established unless warranted by future use levels.” (page 2-28)

Re: Areas Not Included in SRMAs

Finally, it should be noted that the four Non-WSA Lands with Wilderness Characteristics which are not included within SRMAs deserve the “restrictive management prescriptions” provided by Alternative B. (page 4-136) We find unacceptable the last paragraph of Alternative C on page 4-137 which concludes:

The other lands that are not within a managed SRMA with specific recreation objectives would be vulnerable to surface disturbing uses, including commercial permitting activities, special recreation permitting, new road construction, and other activities that could impact the natural values and primitive recreational opportunities and solitude that currently exist in those areas.

ACEC

Re: 4.3.8.2.11 Impacts of Special Designation Decisions (Areas of Critical Environmental Concern (ACEC) pages 4-139 to 4-145, Maps 2-14-B and –C, pages 2-33 to 2-39, and Appendix I
COMMENT: This Resource Management Plan establishes 14 ACEC’s which overlay parts or all of nine Non-WSA Lands with Wilderness Characteristics, and which according to Goals and Objectives stated in Table 2.1 (page 2-33), are: “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, or to protect life and safety from natural hazards.”

BLM solicited proposals of ACEC’s and, as shown in Appendix I, the request for proposals generated a lot of interest from the community at large and resulted in 35 nominations. The review team then reviewed and compiled these nominations into 14 potential ACEC’s. It is ironic that Jerry McNeely, the primary representative from Grand County in the RMP process, (Page I-4) was steadfastly opposed to ACEC’s. He was quoted as saying, “I don’t want to see any of them implemented,” and was instrumental in a 4-3 Council vote expressing his position. (“County Council in conflict with BLM over land designation plan” Moab Times Independent, 10/21/04). Councilman McNeely has repeatedly shown extreme bias against the values defined in Alternative B.

It is more than ironic; it is inexcusable that Alternative C—BLM’s preferred alternative, does not include most of the ACEC’s which were proposed by BLM staff/Moab Field Office Staff, alone or in company of others. Notable examples are: the Bookcliffs Wildlife Area, Canyon Rims, Colorado River Corridor, Labyrinth Canyon, Upper Courthouse, and Westwater Canyon.

The descriptions of almost all of the potential ACEC’s carry the disclaimer that “The occasional presence and noise of OHV use would reduce opportunities for solitude and conflict with primitive forms of recreation.” While this is unfortunately true, we expect BLM to develop and implement approaches to eliminate this problem. If the noise of OHV’s continues to disturb users, one possibility would be noise limitations in the form of mufflers especially on motorcycles.

Re: Behind the Rocks Potential ACEC.

Behind the Rocks ACEC includes portions of Behind the Rocks and Hunter Canyon Non WSA’s with Wilderness Characteristics. Certainly a major reason for proposed this ACEC is to protect the adjacent WSA. Why then is the 12,635 acre Behind the Rocks WSA not included in Alternative C? Behind the Rocks is rich in cultural resources and probably qualifies for inclusion as an Archeological District on the National Register of Historic Places. The entire 12,635 acres should be subject to a Cultural Resources Class III inventory. Also as shown in Map 2-14-C, excluding the WSA results in three or four isolated pieces which are unmanageable as a unit. (page 2-33).

Re: Bookcliffs Potential ACEC

This includes portions of Coal Canyon, Desolation Canyon, Floy Canyon, Mexico Point, and Spruce Canyon. The Bookcliffs must be included in Alternative C. As noted on page I-8,

The Book Cliffs wildlife habitat is of more than local significance. There are no areas in the Western United States (outside of Alaska) that offer such a large, contiguous, unfragmented, and undisturbed habitat for such a large variety of animal species. This extensive habitat promotes biological and genetic diversity that is unavailable in most wildlife habitat areas. The remote areas of the Book Cliffs are important scientific reference sites. Human disturbance and/or development would permanently alter the unfragmented, remote and undisturbed nature of this wildlife habitat. This makes the Book Cliffs proposed ACEC highly
vulnerable to adverse change. The habitat is also irreplaceable, exemplary and unique due to the rareness of large, unfragmented and undisturbed habitat for both plants and animals.

In addition, cultural sites within the Book Cliffs have special worth because their remoteness has left them largely undisturbed, and thus of great importance to scientific study.

BLM should work with UDWR and other agencies to create and implement a Habitat Management Plan for the Bookcliffs. And attention must be paid to inventorying the innumerable cultural sites in the BookCliffs. (page 2-33)

**Re: Canyon Rims Potential ACEC,**
This ACEC includes most of Harts Point and Hatch/Lockhart. Although it would not be designated an ACEC under Alternative C, no new motorized or mechanized routes should be established. There are already many such routes in the Canyon Rims area. (page 2-34)

**Re: Cisco White-tailed Prairie Dog Complex Potential ACEC:**
This complex is important to habitat of prairie dogs, ground squirrels, and raptors; it should be an ACEC within BLM’s preferred alternative, and should prescribe: the modification of grazing systems; the permitting of no new routes; and working cooperatively with UDWR and USFWS. (page 2-34) According to Appendix I (page I-9 and I-10) this is a Utah sensitive species which has been nominated for threatened status. UWDR has mapped historic and current prairie dog towns and their habitat. The habitat within this potential ACEC is essential for maintaining this species.

**Re: Colorado River Corridor Potential ACEC,**
The River Corridor includes portions of Dome Plateau, Fisher Towers, Mary Jane Canyon, and Negro Bill Canyon. This valuable and scenic region should be designated an ACEC under BLM’s preferred alternative. (pages 2-34 and 2-35) The only tourist attraction better known than the Colorado River Corridor is Delicate Arch. The area certainly meets the relevance and importance criteria for scenic, fish and wildlife, and rare and endangered plants. The proposal for this ACEC refers to “such scenic western icons as Fisher Towers, the Colorado River and Castle Rock. (Pages I-10 and 11)

**Re: Highway 279/Shafer Basin/Long Canyon Potential ACEC**
To be designated an ACEC under both Alternatives B and C, this area includes Dead Horse Cliffs, Goldbar, Goosenecks, and Shafer Non-WSA’s with Wilderness Characteristics. (Page 2-36) In addition to managing rock art for public use with interpretation, the BLM should acknowledge the national significance of the Wall Street Rock Art Site by preparing a National Register Nomination.

**Re: Mill Creek Canyon Potential ACEC.**
This ACEC includes Mill Creek Non-WSA with Wilderness Characteristics. Alternative B also includes the WSA which is excluded by Alternative C. The Mill Creek Partnership’s nomination considered the WSA as integral to the 13,501 acre area. It cited the “Class A scenery,” importance of the water resource for human populations as well as for fish and wildlife, and the truly outstanding Native American cultural resources such
as rock art, campsites, rock shelters, alcoves and special activity areas. (Page I-16; Also see page 3-130 to 3-131) Excluding the WSA from the preferred alternative results in a small standalone ACEC of 3,721 acres, and makes no sense in relation to the priority for conduct of a Class III cultural inventory.

Acknowledging the national significance of many of our rock art sites, National Register Nominations need to be prepared and submitted. These areas require immediate targeted management.

In fact, the preferred alternative should include all Alternative B Special Management Stipulations including classification of Mill Creek Canyon as VRM I. (page 2-36) Mill Creek is close to Moab and its scenery is one of its most important features to residents of Grand County and all visitors. In fact in reviewing the description of this potential ACEC point by point, we must recommend that BLM adopt Alternative B in its entirety as the Preferred Alternative.

Re: Ten Mile Wash Potential ACEC
This includes part of Labyrinth Canyon. Our major complaint regards vehicular travel. Alternative B states “No vehicular travel in Ten Mile Wash from Dripping Springs to the Green River,” (page 2-37) which should be stipulated in the preferred alternative. Furthermore, there should be no vehicular travel in Ten Mile at all under any alternative because speed limits cannot be enforced and because it has proved impossible to keep vehicles out of side canyons. For example, repeated re-signing of Trough Canyon has been ineffective. We have hiked the area several times and have seen motorcycle tracks up and down Trough as well as downed signs.

Alternative C’s “Permits for motorized recreational use may be required if monitoring indicates long-term damage” (page 2-37) is unacceptable as a management policy. If monitoring indicates that vehicles are not abiding by posted rules, the route should be closed immediately without waiting for long-term damage to occur, and no permits should be granted.

As described on Page I-17, “cultural resources in Ten Mile Wash are of more than local significance, and are fragile, rare and exemplary.” As the second largest tributary drainage in the Moab Field Office, this Wash is extremely important riparian and wetland habitat—a rare ecosystem. It is vulnerable to adverse impacts, especially those caused by motor vehicles.

Re: Upper Courthouse Potential ACEC
Although it contains no Non-WSA’s with Wilderness Characteristics, this ACEC should be included in Alternative C because it receives a high volume of OHV traffic and needs the special protection listed in Alternative B. The entrance area to Tusher Canyon is getting "hammered" by vehicles. The Blue Buffalo was lost to vandals several years ago. Upper Courthouse with its riparian areas has a high density of archaeological sites which are distributed widely across the landscape. By accepting Alternative B as the preferred alternative, (page 2-38) a Cultural Resources Class III inventory would be performed.

Re: White Wash Potential ACEC:
White Wash contains no Non-WSA’s with Wilderness Characteristics, however we suggest that BLM retain the option of closing the White Wash Sand Dunes to open use if damage is occurring to the riparian dune system and/or if OHVs are damaging resources outside the open use area. Its proximity to Ten Mile leads to vehicles—especially ATVs, crossing over into more fragile areas. (pages 2-38 and 2-39)
In Summary: As concluded on page 4-145, regarding The Impacts of Special Designations Decisions: “In summary, Alternative B would provide the most long-term protection to the naturalness and opportunities for solitude and primitive recreation of non-WSA lands with wilderness characteristics by designating the most acres as ACEC and by recommending the longest stretches of waterways for protection in the National Wild and Scenic Rivers System, followed by Alternative C.”

TRAVEL MANAGEMENT

NON-WSA LANDS WITH WILDERNESS CHARACTERISTICS

Re: 4.3.8.2.13.1 OHV Travel Management. Pages 4-146 thru 4-152, Table 4.5, Page ES-6

COMMENT: This section is very hard to fathom as the frame of reference changes back and forth from acres to miles of routes. Who can understand Table 4.54 (page 4-146 and 4–147) when it is seen that Alternatives B, C, and D are identical with the sole exception of Long Spring Canyon? Also, the Table may be meaningless anyway because it does not define “Limited.” It would have been meaningful if it had been presented as was done in Table ES1 by categories: Closed, Limited to Existing, Limited to Designated, and Open. Does the BLM intend to mean “Limited to existing/designated routes,” per summary Table 4.59 on page 4-164.

The paragraph on page 4-149 of impacts common to the “action alternatives” (B, C, and D) states that game retrieval and antler collection must be done on foot, that vehicles are not permitted to go off designated routes for “such activities.” What about rock collecting, gathering wood, etc.? This paragraph should state that cross-country travel for any activity would be impermissible.

The paragraph beginning at the bottom of page 4-149 also apparently contains an error. Clearly, it means that OHV use will be limited to designated, not existing, routes. The same error is found in the last paragraph on page 4-150. Under all of the action alternatives, vehicles must stay on designated routes.

VISUAL RESOURCE MANAGEMENT

Re: 4.3.8.2.15 Visual Resource Management. Pages 4-154 thru 4-158, Table 4.55

COMMENT: The importance of Visual Resources cannot be exaggerated. The Moab Field Office participated in the National Visitor Use Monitoring (NVUM) pilot project from October 2005 through September 2006. A September 2007 draft report reported findings of the carefully conducted survey of approximately 1,179,500 recreation visits to MFO lands during fiscal year 2006. Among questions asked of all respondents were satisfaction with and importance of various amenities and attractions. On a five-point scale—5 being the highest, the highest rating on satisfaction was 4.9 on SCENERY. On importance the highest rating of 4.8 was shared by SCENERY and CONDITION OF ENVIRONMENT.

Regarding VRM decisions reflected in Table 4.55, we reiterate that the Non-WSA Lands with Wilderness Characteristics must be protected to permit future Congressional consideration as designated wilderness; this means that the preferred alternative should
re-designate all areas as VRM I or II, allowing no more than minor changes to landforms and vegetation. Permitting major modifications (VRM IV) in Coal Canyon, Floy Canyon and Flume Canyon is clearly incompatible with Handbook dictates.

SUMMARY: NON-WSA LANDS WITH WILDERNESS CHARACTERISTICS

Re: Summary, Pages 4-162 thru’ 4-168

COMMENT: According to the first sentence in this summary, “The majority of adverse impacts to naturalness and outstanding opportunities would be caused by surface disturbing activities such as woodland product harvest, land treatments, mineral development, and OHV use.”

Summary tables 4.57 through 4.60 cover some, but not all, aspects of such surface disturbing activities affecting the 266,485 acres. Examples of these activities under BLM’s preferred alternative: 1) 160,599 acres—60%, of Non-WSA Lands with Wilderness Characteristics would be open for ROW’s (Pages 4-114 and 4-115, Table 4.48); 2) 225 acres would be open to coal bed methane development (page 4-129); 3) Horsethief Point and Behind the Rocks would be vulnerable to mining of salable minerals (sand & gravel, building stone)(page 4-131); 4) No portions of ten areas would be designated SRMA’s, and four would not be covered by either SRMA’s or ERMA’s (pages 4-136 and 4-137); and 5) most would not be within designated ACEC’s (pages 4-140 thru’ 4-144). (Incidentally, there appear to be errors and/or muddied discussion in the first paragraph, sentences 3 and 4, of page 4-143 attributing to Alternative C comments which apparently refer to another alternative.)

As for Wild and Scenic Rivers, seven of the 32 Non WSA’s with Wilderness Characteristics would intersect with suitable wild/scenic river segments, totalling 43.66 river miles in those seven in Alternative B (page 4-142), whereas only three would intersect in Alternative C, totaling 16.00 river miles in the three. (page 4-144)

Although they don’t portray the whole story, the summary tables 4.57 through 4.60 do show clear differences—along with some errors, between Alternatives B and C In Oil and Gas Leasing (table 4.57), C commits more acres, namely 14.0% to standard leasing compared to only 6.0% closed; the remaining 80.0% lease with stipulations. The VRM table (table 4.58) is incorrect in showing 0% Class I in Alternative B, while table 4.55 designated some Class I in Beaver Creek, Behind the Rocks, Dead Horse Cliffs, Dome Plateau, Goldbar, Gooseneck, Horsethief Point, Hunter Canyon, Labyrinth Canyon, Mary Jane Canyon, Mill Creek Canyon, Negro Bill Canyon, and Westwater. Finally, in regard to Table 4.60 which lists 161,327 acres or 61% of woodland acres open to harvest under C, we direct BLM to correct errors on page 4-162 noting that “in the 165,984 acres that remain open for wood-cutting (and where the resource exists), wilderness characteristics may be compromised by surface disturbing activities such as driving cross-country to the trees . . .”

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVES

Re: Section 4.3.16 Travel Management Pages 4-404 thru 4-413

COMMENT: After approval of the RMP, if the MFO Authorizing Officer determines that OHV travel use would cause or have the potential to cause adverse impacts, then an area
could be closed to travel or travel restrictions would be imposed. (Impacts common to all Action Alternatives, pages 4-405)

The RMP needs to contain monitoring stipulations which at a minimum contain the following:

- annual monitoring with photos
- mile sections of road with the number of motorized tracks leaving the road
- width of road
- status of signs (shot, missing, down, defaced)

Among actions which could be instituted are:

- one way travel
- noise limitations (muffles)
- permits with maximum number of vehicles
- closed during certain times of the season
- closed to recover
- closed permanently

If the BLM can set up monitoring for cattle and to "rest" the land for recovery when there is not enough forage to sustain cattle and keep the land healthy, then the BLM should be able to do the same for off-road vehicles. Any route or segment of route which cannot be monitored by BLM should be closed.

It is understood that having only two BLM rangers is not sufficient for 1.7 million acres. BLM needs to pursue some sort of in-the-field monitoring in highly used areas. People are more likely to behave when there is an official presence (law enforcement or not) than when no one is around.

BLM must be concerned about displacement, that of losing the "good" ORV people (those who stay on the road, do not speed and are in the area to enjoy the scenery) and being replaced by the "bad" ORV drivers, those who are in the area for thrills, speed and damage. Too many "bad" ORV drivers will tend, over time to replace the "good" ORV people who will either not come as often, or who will find better managed areas to visit.

Another area in which the RMP is very weak in how the Travel Plan is going to be implemented. We urge BLM to include in the RMP steps they will take to ensure that vehicles stay on designated roads. One rule that could be instituted is: every road is closed unless there is a sign marking it open. Manpower to do this would come from many organizations when they find out that their travel is limited only because signs are not installed. Also, routes that are dead-end should be signed dead-end at the beginning, and the turnaround should also be signed.

**SHORT TERM USE VERSUS LONG TERM PRODUCTIVITY**

Re: 4.3.22.8 Non-WSA Lands with Wilderness Characteristics, Pages 4-494 and 4-495

**COMMENTS:** This section portends many more “costs” than “benefits,” especially in the long term, which is defined as the 15-20 year life of the Plan. Only prescribed fire for vegetation treatments, and construction of riparian fences or new water developments would enhance the natural character of Non-WSA lands in the long-term. All other uses would “degrade”--in BLM’s terms, wilderness characteristics. To be honest, BLM should
admit that these developments/uses would destroy wilderness characteristics, making them ineligible for wilderness designation, not just in the long term, but forever.

**IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES**

Re: 4.3.23.6 **Non-WSA Lands with Wilderness Characteristics**, Page 4-499

COMMENTS: We cannot do better than to just quote the RMP:

*Any loss of naturalness and/or solitude within non-WSA lands with wilderness characteristics due to surface disturbing activities such as mineral development, wood harvest, and cross county OHV use would be irretrievable until the impact area was fully reclaimed. The scenic quality of areas with scenic values could be degraded over the life of the plan.*

**CUMULATIVE IMPACTS**

Re: 4.3.24.7 **Non-WSA Lands with Wilderness Characteristics**, Page 4-504

COMMENTS: According to this section, the analysis of Cumulative Impact “includes all Federal with wilderness characteristics in Utah that are currently being managed for management of wilderness characteristics to protect those values.” That is, it includes designated wilderness, WSAs and Non-WSA lands with wilderness characteristics, all of which are protected by law or administrative decision. Alternative B would protect a total of 5,932,521 acres or about 4.5% of the statewide total. Alternative C by contrast would protect only 0.8%—less than one per cent of the statewide total acres which are, in BLM’s words quoted above, *currently being managed for management of wilderness characteristics.* The Interim Management Plan for Lands Under Wilderness Review (IMP) should thus govern all of these areas under all—or at least all action, alternatives. As stated in Appendix P, the current Land Use Planning Handbook (H-1601-1, 2005) BLM land use plans must avoid or minimize impacts to wilderness characteristics. Alternative C is incompatible with this charge.

**C. OTHER COMMENTS**

Re: **GLOSSARY** Pages X-29 thru’ X-42

COMMENTS: The Glossary is not comprehensive. For example, “way” is defined, but “route” and “road” are not. “Mechanized” and “non-mechanized travel” are not defined at all. Attachment A of Appendix G includes additional terms which should be justified with Glossary definitions and/or referenced in the Glossary. It is possible that there are definitions in other appendices or the text of the document itself which, if added to the Glossary, would make it more user friendly.

Re: **INDEX** Pages X-43 thru’ X-46

COMMENTS: We cannot discern the criteria used by BLM to decide on which terms to index and which to ignore. The various species of fish and wildlife are indexed. The names of creeks and canyons; of potential ACEC’s, SRMA’s, and WSA’s; and of
state/federal agencies are indexed. Non-WSA Lands with Wilderness Characteristics are not. All told, it is of limited helpfulness.

**Re: SOCIOECONOMIC RESOURCES** Pages 3-95 thru 3-118, 4-252 thru 4-277, 4-496 and 4-507

COMMENTS: The population data, along with other demographic and housing data in Chapter Three are taken from the 2000 Census, as analyzed by the Sonoran Institute. Had BLM consulted the Utah Governor’s Office of Planning and Budget, they could have considered, as well, reliable estimates for year 2005 and projections to 2015 and 2025 for Grand and San Juan Counties. The Governor’s Office also makes estimates and projections for employment figures.

We would contend, however, that the population increases of concern are not of the resident populations of these two counties, but the fast growing Wasatch Front of Utah and all parts of Colorado. According to the National Visitor Use Monitoring study conducted by the MFO in fiscal year 2006, these are the sources of most travelers to the Moab District. The single zip code with the greatest number of visitors, 82, was 84532 which is Grand County. There were an additional 117 from other parts of Utah principally the Wasatch Front. But even more than Utahns were Colorado visitors--there were 210 of them. They come for fun and recreation, for refuge and relaxation, for peace and quiet. Some observers contend that displacement would occur if there were tighter restrictions on OHV travel in the MFO. We would argue that such displacement has already taken place, but in reverse—i.e., tighter restrictions in Colorado have led to their visiting Utah for cross country and other off-highway activities.

Chapter four shows relatively few if any differences among alternatives in Socioeconomic impacts, whether beneficial, adverse, or unspecified. No differences were projected in Environmental justice, PILT payments, Population, Fire management, Health and safety management, Lands and realty, Locatable minerals, Salable minerals, Paleontological resource decisions, Riparian decisions, Soil/Watershed, Wilderness Study Areas and Wilderness areas, Special status species, Vegetation decisions, and Woodland decisions.

As for Cultural resources, Alternative B would produce singular and very beneficial impacts. (pages 4-253 to 255) As for Livestock grazing, B would produce minor beneficial and fewer adverse impact. (pages 4-247 to 4-258) (Since only 36% of the current permittees live in the MFO anyway, their beneficial impacts to the economy are very limited.)

As for Leasable minerals, Alternative B would permit less well drilling and would therefore have adverse fiscal impacts and would account for half the royalty payments for oil well compared to C, and 60% for gas wells. (Table 4.76 on page 4-264) There would be some impact on jobs, but according to the RMP, most of the jobs would not be held by MFO residents. As shown in Table 3.6 on page 3-106, the per cent employed in Mining of all kinds declined from 18% in 1980 to 1% in 2000. There are no indications that a reversal in the trend would occur under any alternative. In fact, current trends show that the economy of the Moab District will continue to be dominated by travel and tourism. The employment shifts will increasingly be low-paying trades and services, oriented to tourism. Finally, any loss to mining sectors over the life of the Plan will be more than made up by DOE’s moving the Atlas Tailings, which will employ the same skilled workers until the year 2028 or later. (page 4-507)

The impacts of Non-WSA Lands with Wilderness Characteristics and of Visual Resource decisions are most beneficial socioeconomically under Alternative B. Page 4-
265 cites extensive body of literature demonstrating the considerable economic benefit of protecting wilderness quality lands. We were struck by the conclusion in this section comparing Alternatives B and C that “adverse social and economic impacts as a result of decreases in OHV use are not likely regardless of alternative selected.” This contrasts with the section on Recreation and Travel, in which they postulated that such a decrease under Alternative B would reduce tax revenues to local governments. This comes with the caveat, however, that it is impossible to quantify the proportions of recreational expenditures which are attributed to resident consumers versus non-recreational consumers. (page 4-269)

“Short-term use of resources in the MPA would have negligible impacts on the long-term social and economic health and stability in Grand and San Juan Counties.” (page 4-496)

There are also socio-cultural and technological trends which impact planning and which BLM did not consider. If we can place any stock in the popular media, it seems that the generation which will mature in the next 15-years is involved in text messaging, internet experiences and other instant and constant communication with their peers. Perhaps they respond to ads promising faster, more powerful, more “fun” motor vehicles. On a more positive vein, they may also be more concerned than older generations with the environment and more likely to volunteer to make a difference and to give back to the community.

**CLIMATE CHANGE**

The other big—enormous, really, consideration which lies outside the RMP/EIS planning process is the undeniable reality of global warming. By all reliable measures, the pace is quickening. Planning for the condition of our environment 15 or 20 years down the road must take into account the certainty of drought, scarcity of resources, and changes in energy production and consumption, as well as related and resultant changes in the political environment.

**CONCLUSIONS**

Planning requires bravery. To look into the jaws of the future requires:

- knowledge of past failures and successes,
- knowledge of current trends, and
- knowledge of where you’re going—the shining goal directing your footsteps.

Given the environmental, socioeconomic, socio-cultural, and technological trends analyzed in this Comments document, and Given the reality and pace of Climate Change, the best fit to meet the future needs of the MFO is the **Conservation Alternative**. The Preferred Alternative should be Alternative B.