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Utah BLM Statewide  
Wilderness Final  
Environmental Impact  
Statement

Volume VII  
Part C  
Public  
Comments



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# INTRODUCTION TO VOLUME VII-C: SPECIFIC COMMENTS

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Volume VII presents public comments on the Utah BLM Statewide Wilderness Draft EIS. It has three parts: Volume VII-A presents copies of letters from elected officials, agencies, and selected organizations; Volume VII-B includes General Comments relative to the Statewide analysis; and Volume VII-C includes WSA Specific Comments.

Volume VII-C is a set of representative Specific Comments and Responses applicable to each of the individual WSAs in Volumes II through VI. Some of the comments pertain to more than one WSA and, therefore, are listed under each one, as applicable. All topics are covered, but not all individual comments are included since many similar and duplicate comments were received. Also, comments and petitions expressing only a preference "for" or "against" wilderness for any particular WSA are not included, as these are addressed in Chapter 5 of Volume I. The names presented in brackets following the comments are examples of persons, groups or agencies who made the comment or comments.

The material in Volume VII-C is presented in 83 sections corresponding with the Statewide Pocket Map reference numbers of the WSAs as follows:

WSA Name	Page
1. North Stansbury Mountains	1
2. Cedar Mountains	7
3. Deep Creek Mountains	11
4. Fish Springs	21
5. Rockwell	27
6. Swasey Mountains	30
7. Howell Peak	37
8. Conger Mountain	41
9. Notch Peak	44
10. King Top	50
11. Wah Wah Mountains	57
12. Cougar Canyon	60
13. Red Mountain/Red Mountain 202	65
14. Cottonwood Canyon	67
15. LaVerkin Creek	71
16. Deep Creek	72
17. North Fork Virgin River	76
18. Orderville Canyon	77
19. Parunuweap Canyon	79
20. Canaan Mountain	88
21. Moquith Mountain	95
22. The Blues	100
23. Mud Spring Canyon	107
24. Paria-Hackberry/Paria Hackberry 201	113
25. The Cockscomb	126
26. Wahweap	130
27. Burning Hills	143
28. Death Ridge	150
29. Phipps-Death Hollow	157
30. Steep Creek	167
31. North Escalante Canyons/The Gulch	175
32. Carcass Canyon	190
33. Scorpion	198
34. Escalante Canyons Tract 5	213
35. Fifty Mile Mountain	216
A. Red Butte	228
B. Spring Creek Canyon	229
C. The Watchman	230
D. Taylor Creek Canyon	232
E. Goose Creek Canyon	233
F. Beartrap Canyon	233
36. Mt. Ellen-Blue Hills	234
37. Bull Mountain	242
38. Dirty Devil	245
39. Horseshoe Canyon (South)	253
40. French Spring-Happy Canyon	260
41. Fiddler Butte	274
42. Mt. Pennell	290
43. Mt. Hillers	306
44. Little Rockies	310
G. Fremont Gorge	313
45. Mancos Mesa	316
46. Grand Gulch	321
47. Road Canyon	330
48. Fish Creek Canyon	340
49. Mule Canyon	350
50. Cheesebox Canyon	354
51. Dark Canyon	363
52. Butler Wash	367
53. Bridger Jack Mesa	370
54. Indian Creek	374
55. Behind the Rocks	379
56. Mill Creek Canyon	387
57. Negro Bill Canyon	395
58. Horseshoe Canyon (North)	403
H. Lost Spring Canyon	406
J. South Needles	408
59. San Rafael Reef	408
60. Crack Canyon	419
61. Muddy Creek	428
62. Devils Canyon	437
63. Sids Mountain/Sids Cabin	448
64. Mexican Mountain	461
65. Jack Canyon	479
66. Desolation Canyon	483
67. Turtle Canyon	500
68. Floy Canyon	508
69. Coal Canyon	519
70. Spruce Canyon	533
71. Flume Canyon	542
72. Westwater Canyon	556
73. Winter Ridge	560
I. Daniels Canyon	562

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# INTRODUCTION TO VOLUME VII-C: SPECIFIC COMMENTS

Separate comments regarding each subject are numbered with a decimal under each WSA section (i.e. Specific Comment 2.1). Where applicable, individual comments which are related to a common theme and response are identified further with small letters preceding the paragraphs which start the individual comments.

Volume VII-C is a list of representative specific comments and responses prepared to each of the individual WSA sections in Volume VI. Some of the comments are listed under each section as specific comments and are numbered, but not all individual comments are included since many similar and related comments were received. All comments and related responses are included in a separate list of "related" comments for any particular WSA not included in this list which are in Chapter 2 of Volume I. The format provided in this chapter following the comments are examples of the format of agency and public comments.

The material in Volume VII-C is presented in 23 sections corresponding with the Statutory Forest Map reference numbers of the WSA as follows:

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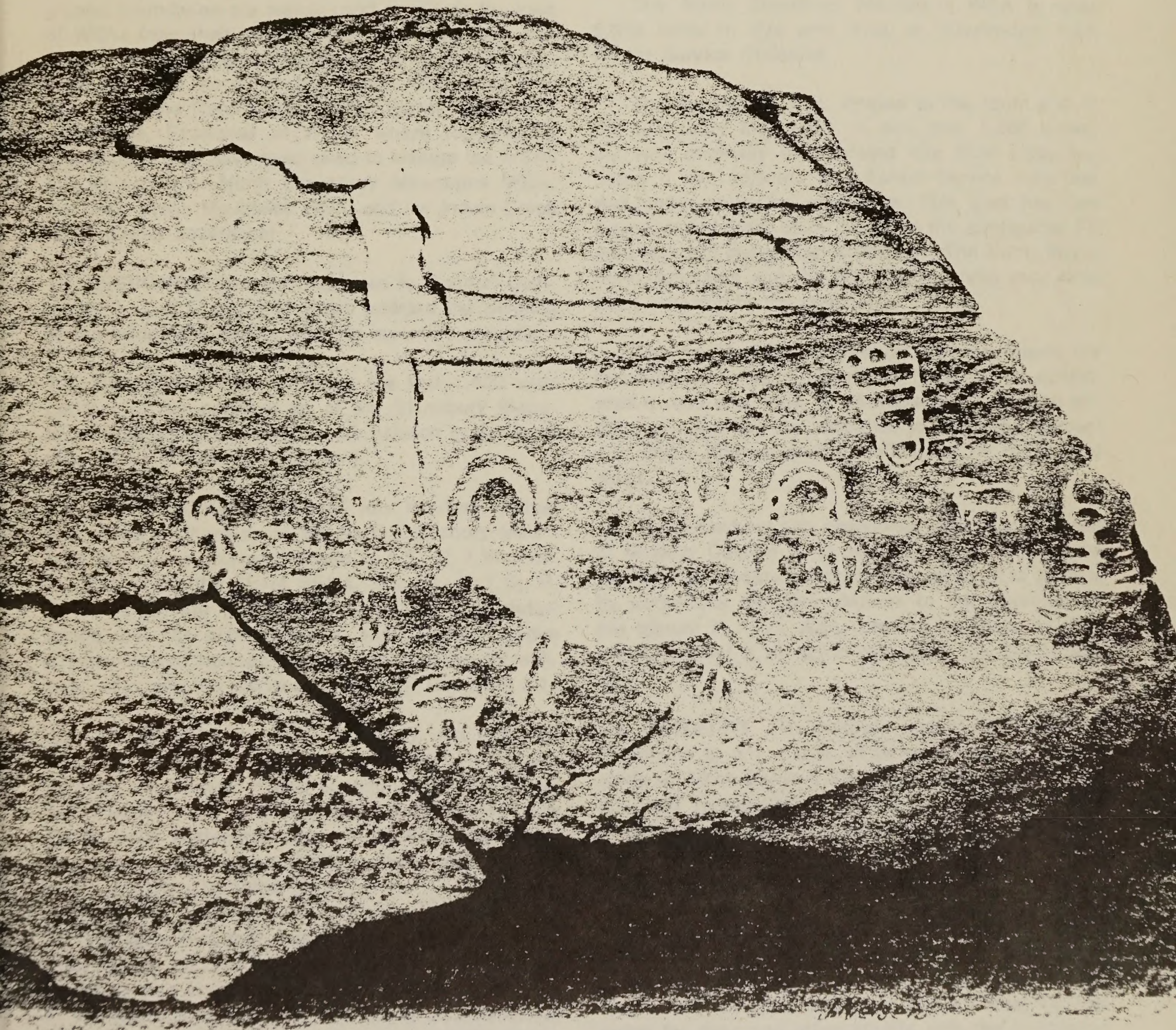
Section	Page
1	1
2	2
3	11
4	21
5	27
6	30
7	37
8	41
9	44
10	49
11	51
12	52
13	53
14	57
15	61
16	67
17	72
18	74
19	77
20	79
21	82
22	85
23	109
24	109
25	112
26	124
27	127

1	1
2	2
3	11
4	21
5	27
6	30
7	37
8	41
9	44
10	49
11	51
12	52
13	53
14	57
15	61
16	67
17	72
18	74
19	77
20	79
21	82
22	85
23	109
24	109
25	112
26	124
27	127

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# Specific Comments

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**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 1: NORTH STANSBURY MOUNTAINS WSA**

**SECTION 1**  
**NORTH STANSBURY MOUNTAINS WSA**

**1.1 COMMENT:** The best way to define WSA boundaries would be to use topographic features where possible and use section lines only where there aren't any clearly defined topographic features. In the EIS, topographic boundaries are mainly used to reduce the area of WSAs from their sizes in the initial inventory. Examples are: the Spencer Flats area in the North Escalante Canyons/The Gulch ISA Partial Wilderness Alternative and the Road Canyon WSA Partial Wilderness Alternative. Examples of WSAs where topographic boundaries could have been used to enlarge the WSAs but weren't are: North Stansbury Mountains WSA, the Deep Creek Mountains WSA, and the Indian Creek WSA. [Owen Severance]

**1.1 RESPONSE:** See the responses to General Comments 2.11, 3.1, and 3.43 which address the purpose of the wilderness review and the inventory process.

**1.2 COMMENT:** BLM excluded the first 1,400 vertical feet of the northern tip of the Stansbury Mountains. BLM gave no reason for its deletion in the inventory. [Utah Wilderness Coalition]

**1.2 RESPONSE:** One-thousand four hundred vertical feet of the northern tip of the North Stansbury Mountains WSA were deleted because T. 1 S., R. 7 W., sec. 16, and all but the SE1/4 SE1/4, Sec. 21, T. 1 S., R. 7 W., is private property. In addition, BLM determined that this exposed ridge, sitting directly above a highway and railroad, lacked opportunities for solitude. Also, see the response to General Comment 3.1.

**1.3 COMMENT:** We were constantly told from the start that BLM would not consider anything as a wilderness area unless it had continuity with FS areas. And now there are 6 miles of buffer zone between the Desert Peak Wilderness area and on North Stansbury. So it isn't continuity, and BLM wasn't true to their word. [Charles Stromberg]

We were told that only roadless areas qualified. They had to be roadless and also there would not be marks of man and there would be solitude. The areas in the North Stansbury that are being considered for wilderness in the EIS have a road area into the Muskrat Canyon area. There are also a lot of signs of man

in that area. There is even a burned-out truck up at the head of the Muskrat Canyon.

**1.3 RESPONSE:** The Tooele County Commissioners were informed of BLM's wilderness inventory, its process, and progress on a number of occasions, the first documented as March 2, 1979.

The North Stansbury Mountains WSA is over 5,000 acres in size and, thus, is independent from Forest Service decisions.

The Big Hollow area, located at the south end of the Stansbury Mountains, is less than 5,000 acres, but was originally incorporated into BLM study because it was adjacent to a Forest Service area that was under study for wilderness. This area has now been omitted from study because the contiguous FS area was not designated wilderness. The North Stansbury Mountains and the Big Hollow areas may have been confused by the commentor.

The travel route in Muskrat Canyon meets the definition of a "way." Legally, a "way" is not considered a road and, thus, is allowable in a proposed wilderness area. See the response to General Comment 4.1 which addresses the definitions of roads and ways.

The burned-out and abandoned vehicle at the head of Muskrat Canyon is an imprint of man, but will be removed or rendered unnoticeable when BLM submits its wilderness recommendations to the Secretary of the Interior in 1991. Also, see the response to General Comment 2.10 which discusses the Big Hollow unit.

**1.4 COMMENT:** The northern end of the Stansbury Mountains is not a true wilderness area. There are roads up Mack Canyon, Miner's Canyon, Muskrat Canyon, and Timpie Canyon. There are extensive mining dumps and buildings. The area to the north was once surrounded by an ammunition and explosive factory, a quartz quarry, chemical plants, and lime plants.

There is a unique geological feature on 60 acres atop a plateau. This area consists of rolling hills, grass meadows, and aspen trees, and it slopes gently to the north. This could be developed into an ideal summer range for deer and other wildlife with the installation of a guzzler to provide water in dry seasons. This development would not be permitted under a wil-

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 1: NORTH STANSBURY MOUNTAINS WSA (CONTINUED)

derness designation. I recommend that the north slope and the northern part of the Stansbury Mountains be classified as a multiple-use area. [Tooele Wildlife Federation]

**1.4 RESPONSE:** The roads described in Mack and Timpie Canyons are not included in the BLM Proposed Action alternative. There are intrusions in Muskrat and Miners Canyons; however, because these passageways are not maintained by mechanical means, they meet the definition of a "way" and are compatible with wilderness guidelines.

The meadow on the north end of the WSA is unique. It is natural and is included in the proposed wilderness area.

The Wilderness Management Policy (USDI, BLM, 1981b) does not eliminate the potential for all water installations. A guzzler could be installed in the wilderness area if compatible with wilderness management.

Also, see the responses to General Comments 3.26, 9.11, 14.8, and 14.22.

**1.5 COMMENT:** Pages 4, 5, 6, 7, 8, and 22: The differences between the All Wilderness Alternative and BLM's Partial Wilderness Alternative should be mentioned, as they have been; however, because they are minor when considering the area in general, they should be downplayed. The Draft EIS states that only approximately 120 acres of mining claims will be disturbed and there will be no interference with any existing oil or gas leases. The acreage comprising the difference between All and Partial Wilderness Alternatives will not interfere with rangeland developments, wildlife developments, water resource facilities, grazing AUMs, or the harvest of forest products. Only 0.25 more mile of roadway would be closed. It appears that the only reason for the smaller BLM proposal is to make it easier for the six claims to operate. Page 22 states that, of the six mining claims, only one is sometimes active (but not producing at this time). Page 22 also shows that mining employment for Tooele County is small and declining in recent years. These statements argue against the smaller Partial Wilderness Alternative. [George Hinde]

**1.5 RESPONSE:** BLM has included the 480 acres in its revised Proposed Action of All Wilderness for this WSA.

**1.6 COMMENT:** Your 10,000-acre Partial Wilderness Alternative seems to be a good one to which I would add a suggestion. Why not add the remaining 480 acres if, after a specified time (10 or 20 years), the mineral resources are not developed? Surely, if the minerals present are valuable, some development is likely. Unless there is development or an evaluation for minerals potential, the land could be managed in the interim much as the current WSAs are being managed to preserve their wilderness character. This would preserve the essential wilderness character for possible future inclusion as wilderness without precluding exploration or development. [Michael Van Note]

**1.6 RESPONSE:** See the responses to Specific Comments 1.5 and 1.7 and General Comments 1.1 and 15.5.

**1.7 COMMENT:** On our trip to the area from June 6 to 8, 1986, we found that the entire area provided exceptional opportunities for primitive recreation in a very natural setting. Solitude opportunities were superb. [Sierra Club, Cache Group]

We question BLM's decision to eliminate 480 acres because of human impacts. We surveyed the impact area during our trip and found the few mining remains insignificant. The 480 dropped acres should be returned to BLM's wilderness proposal.

**1.7 RESPONSE:** As stated in the Draft EIS, Affected Environment, Wilderness Values section, intrusions were found to be substantially unnoticeable. The acreage is included in the All Wilderness Alternative, which is BLM's Proposed Action for this WSA.

**1.8 COMMENT:** BLM should continue to support a 10,000-acre wilderness. The 8,700-acre Partial Wilderness Alternative seems aimed at reducing acreage of an already small WSA. The 10,000-acre alternative should go forward, and no additional acreage should be dropped without the benefit of the USGS/USBM reports. That way, the decision can be based on the best data available, rather than on total speculation, which is all the 8,700-acre alternative is based on. Maintain this excellent recommendation. [Utah Wilderness Association]

**1.8 RESPONSE:** See the responses to Specific Comments 1.5 and 1.7, and General Comments 2.33, 8.3, and 9.6.



# SPECIFIC COMMENTS AND RESPONSES

## SECTION 1: NORTH STANSBURY MOUNTAINS WSA (CONTINUED)

**1.9 COMMENT:** Page 13, Vegetation section: The text states that the biotic community is juniper woodland without pinyon, and then immediately refers to "this pygmy forest habitat." To which pygmy forest habitat does this refer? [State of Utah]

**1.9 RESPONSE:** The pygmy forest habitat referred to on Page 13 is synonymous with the juniper woodland habitat. The reference to pygmy forest has been deleted to avoid confusion.

**1.10 COMMENT:** The No Action/No Wilderness Alternative projects 216 acres of disturbance, affecting only that amount of wilderness values lost due to exploration and development. The impact conclusion for the No Wilderness Alternative understates the potential future effect. The impacts would extend beyond the disturbed area. [Composite from several sources]

**1.10 RESPONSE:** The 216-acre figure was used in the Draft EIS as an upper limit of disturbance if known minerals were developed. For the Final EIS, projections of potential development have been made for the foreseeable future. These projections indicate that only 2 acres would be developed in the foreseeable future.

Also see Appendix 11 in Volume I; General Comment Responses 9.4, 15.11, 15.20, and 15.54; and the Environmental Consequences of Alternatives.

**1.11 COMMENT:** Both moderate values and conflicts are present within the region. Most of the conflicts can be eliminated or reduced by the smaller 8,700-acre Partial Wilderness Alternative. In the recommended 10,000-acre partial alternative, some of the Monte Carlo Mine workings probably extend under the wilderness boundary. The ore-bearing structure, a replacement deposit striking North 10 East and dipping 60 Northwest, would conflict with the proposed boundary. The 8,700-acre alternative retains the highest quality wilderness values while minimizing these problems. Nevertheless, some conflicts would likely still exist, particularly with the nearby industrial zone. There are three industrial businesses within 2 to 3 miles of the WSA which maintain mineral leases adjacent to the WSA (U.S. Lime, Portland Cement, and Climax Chemical). The significance of these remaining conflicts needs to be analyzed further. [State of Utah]

**1.11 RESPONSE:** Underground workings show no surface disturbance in the WSA; therefore they do not conflict with wilderness qualities and characteristics, as outlined in the 1964 Wilderness Act, if valid claims are filed prior to wilderness designation.

Congressional guidance cautions Federal agencies on consideration of outside sights and sounds in wilderness studies. House Report No. 95-540 concludes that, in certain cases, sights and sounds should heighten the public's awareness and appreciation of the area's outstanding wilderness values.

Also, see the responses to General Comments 7.1 and 23.7 which discuss buffer zones and the effect of designation on areas outside wilderness.

**1.12 COMMENT:** Page 15 gives the impression that the USGS and USBM will review the importance rating given by BLM. This is not correct; USGS and USBM will do a mineral survey to determine the mineral values. [Agency comment]

**1.12 RESPONSE:** See the response to General Comment 15.7. The OIR has not been used in the Final EIS. In addition, the wording in the EIS has been changed, as suggested in the comment.

**1.13 COMMENT:** Pages 22 through 32, Environmental Consequences of Alternatives sections: It is stated that wilderness designation would result in the loss of oil and gas exploration but, due to the small size of the potential deposits, exploration and development probably would not occur, regardless of the wilderness issue. It also states that wilderness designation would result in the loss of locatable minerals; however, the Draft EIS also shows that mining activity in the area is already low and has been decreasing over the past several decades. Either stop trying to give the impression that wilderness designation would create harmful effects in mining, or else tie all of the various pros and cons together in one or two paragraphs under one section. [George Hinde]

**1.13 RESPONSE:** The text has been clarified to more clearly discuss anticipated actions in the WSA for the foreseeable future. Also, see the response to General Comment 9.4 which discusses analysis assumptions.

**1.14 COMMENT:** What does the term "mineralized deposits" mean? The term deposit means a mineral

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 1: NORTH STANSBURY MOUNTAINS WSA (CONTINUED)

deposit. Is there such a thing as an unmineralized deposit? [Mineral interests]

**1.14 RESPONSE:** The term "mineralized" has been removed from the sentence.

**1.15 COMMENT:** Page 16, Locatable Minerals: There is potential for disseminated gold in the WSA. Other mineral assessment data are in concert with acceptable mineral modeling procedures. [State of Utah]

**1.15 RESPONSE:** The potential for occurrence of disseminated gold in this WSA was noted in the Draft EIS on Page 117, column one, last paragraph. This potential is also recognized in the Final EIS. Also, see the responses to General Comments 15.1, 15.15, and 15.54.

**1.16 COMMENT:** Table 5, Page 15, is confusing. Coal, phosphate, and hydropower have a certainty rating of 4 (the highest) for their existence in the WSA. Yet, the table also says there is no estimated resource. The meaning is not clear. This also occurs for resources in other WSAs in the same table. [Composite minerals comment]

**1.16 RESPONSE:** As explained in the footnotes to the table, the f1/c4 rating indicates a high certainty that no known geologic favorability exists. In other words, it is certain that no resource exists. Also see the response to General Comment 15.8.

**1.17 COMMENT:** The quantities of gold and silver in the WSA and their relative values are not made clear. [Utah Wilderness Coalition, et al.]

**1.17 RESPONSE:** The Final EIS has been revised and metal deposits for gold and silver have been re-defined to more accurately reflect current western mineral economics (see Appendix 6 in Volume I). All discussions of gold in the Final EIS quantify gold in troy ounces and the discrepancies in quantities have been resolved. All tonnages of other minerals noted in the mineral and energy resource tables are in metric tons unless otherwise noted.

**1.18 COMMENT:** Page 7, Partial Wilderness Alternative: The mining claims mentioned in the narrative should be shown on Maps 3 and 4 to determine their location relative to the boundary adjustments given in this alternative. [Agency comment]

**1.18 RESPONSE:** See the responses to General Comments 15.25 and 26.1.

**1.19 COMMENT:** Two high potential mineral properties occur either within or contiguous to two Utah BLM WSAs; namely, the North Stansbury Mountains and the Deep Creek Mountains. It is our intent to continue exploration in these two high potential areas utilizing surface mapping and geochemical sampling. Pending results comparable to those already obtained, both properties will be drilled and developed within the next 3 to 5 years, pending discovery of an ore deposit. [Mineral Land Research]

We will be glad to share our proprietary observations, data, and literature research with BLM geologists at a mutually agreed-upon time and place, if such will be retained in confidence.

**1.19 RESPONSE:** The Final EIS projects that only exploration of minerals will occur in the foreseeable future in the North Stansbury Mountains WSA (see Appendix 6 in Volume I).

Also, see the responses to General Comments 8.25 and 15.19 which discuss proprietary information. Also, see the response to Specific Comment 3.22.

**1.20 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM's consideration. The WSA has been a historic producer of lead, silver, zinc, copper, and iron. Numerous roads, jeep trails, mine structures, and buildings related to previous mining activity also exist in the eastern half of the WSA.

There is a moderate to high potential for future production of lead, zinc, silver, copper and gold in sedimentary rocks, especially in the northern half of the WSA. [Utah International, Inc.]

**1.20 RESPONSE:** Past mining activities and mineral occurrence were considered in the Draft EIS. The text has been revised in the Final EIS to more clearly explain the geological environment for the minerals identified in the comment. Sediment-host mineral favorability has also been addressed.

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 1: NORTH STANSBURY MOUNTAINS WSA (CONTINUED)

**1.21 COMMENT:** Field observations along the east border of the WSA and east thereof for at least 1 mile or more, results of geochemical sampling and analyses, and in-depth literature research all support a high rating for the presence of mercury, arsenic, antimony, copper, lead, zinc, barium (as barite), silver, and gold mineralization within the Stansbury Mountains. All of these metals have been detected in anomalous amounts by geochemical assay, and their respective minerals have been observed in place. Moreover, base, precious, and strategic metal mining have occurred within and immediately adjacent to the WSA, both historically, and as recently as the mid-1950s (Rigby, 1958). [Mineral Land Research]

Limestone mining and lime production are occurring today within 2 miles of the proposed WSA, and have been for years. Consideration of modern concepts of hydrothermal mineralization and vertical and lateral zoning of alteration and mineralogy also suggests that the previously mentioned metals occur at shallow depth within the WSA itself.

**1.21 RESPONSE:** The information presented in the comment has been included in the mineral discussion in the Final EIS. Also, see the response to Specific Comment 1.20.

**1.22 COMMENT:** References listed below were not included in the Draft EIS. These publications contain important information bearing on past mining and/or mineral potential of the Stansbury Mountains. Our data and observations are not limited to the WSA itself. [Mineral Land Research]

Beckman, R. T. and Kerns, W. H. 1965. Mercury in Utah. Information Circular 8252. U.S. Department of the Interior, Bureau Mines. Pages 352-357.

Davis, B. L. 1959. "Petrology and Petrography of the Igneous Rocks of the Stansbury Mountains, Tooele County, Utah" in Brigham Young University Research Studies, Geology Series. Volume 6, No. 2. Brigham Young University, Provo, Utah.

Rigby, E. K., (editor). 1958. "Geology of the Stansbury Mountains, Tooele County, Utah" in Guidebook to the Geology of Utah. No. 13. Utah Geological Society, Salt Lake City, Utah.

Tooker, E. W. and Roberts, R. E. 1971 "Structures Related to Thrust Faults in the Stansbury Mountains, Utah." Professional Paper 750-B, U.S. Department of the Interior, Geological Survey. pp. B1-B12.

**1.22 RESPONSE:** Although not listed in the Draft EIS Bibliography, these references were used by SAI and BLM geologists. An expanded bibliography including publications used since 1982 has been included in the Final EIS.

**1.23 COMMENT:** BLM lists the number of raptors present in the WSA. The specific species should be listed and accompanied by brief descriptions of particular habitat requirements. [Scott Mills]

**1.23 RESPONSE:** A complete listing of specific raptor species and their particular habitat requirements is not necessary. Species of particular concern or sensitivity have been individually addressed. A complete listing of raptors and habitat requirements is located in the Tooele RMP, as referenced in the text of the EIS.

Also, see the responses to General Comments 9.6, 16.2, 16.5, and 22.4 which discuss wildlife and the need for data.

**1.24 COMMENT:** Page 17, Wildlife: Even though UDWR overlays depict sage grouse habitat within the western portion of the WSA, it is highly questionable that sage grouse are present. No recent sightings (within the last 10 years) have been documented on the Skull Valley side of the Stansbury range. [State of Utah]

**1.24 RESPONSE:** Sage grouse historically occupied the area and this is noted in the Final EIS.

**1.25 COMMENT:** Page 18, Table 7: There appears to be a discrepancy between the information contained on Table 7 and the narrative in the second column at the bottom of Page 18. The information contained in the Livestock Grazing Use data table indicates that the season of use for the Stansbury Mountain Allotment is from June 15 to May 1, which would indicate almost year-round use. The information contained in the narrative at the bottom part of Page 18 indicates that seasonal use occurs in the summer between June 15 and August 1 in the Stansbury Mountain Allotment. [State of Utah]

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 1: NORTH STANSBURY MOUNTAINS WSA (CONTINUED)

**1.25 RESPONSE:** Table 7, Page 18, of the North Stansbury Mountains WSA was in error. The season of use for the Stansbury Mountains Allotment should have read June 15 to August 15. Both the table and the narrative have been corrected in the Final EIS.

**1.26 COMMENT:** In the North Stansbury Mountains WSA, a significant speleontological resource will be removed from wilderness protection if the 8,700-acre alternative is chosen over the 10,000-acre alternative. We would be willing to discuss this situation with a BLM representative. Perhaps an alternate option could be adopted. [Dale Green]

**1.26 RESPONSE:** See the responses to Specific Comments 1.5 and 1.7.

**1.27 COMMENT:** This area in itself meets the mandatory wilderness characteristics. BLM vastly underestimates the recreation use of this area. The estimated numbers of visitors claimed by BLM to visit this area in 1 year are too low. During hunting season, this number of visitors can be found in the area during one weekend. This area, favored by local people, offers outstanding opportunities for primitive recreation, solitude, and naturalness. [Utah Wilderness Coalition]

**1.27 RESPONSE:** Use figures for the WSA were estimated by BLM recreation specialists familiar with the area. These estimates were field checked by visits, flights, and vehicle counts on selected weekends.

Hikes into the WSA were conducted on six different occasions. No rock circles or old camps were encountered, which indicates that overnight or extended use of the area is infrequent. Also, see the response to General Comment 21.5.

**1.28 COMMENT:** The Salt Lake District, like the Cedar City District, used screening as the sole determinant for solitude. This improper definition of solitude, along with speculative mineral values, was used to trim the size of BLM's recommendation. The All Wilderness Alternative should be adopted by BLM. [Owen Severance]

**1.28 RESPONSE:** See Appendix 11 in Volume I and the responses to General Comments 3.1 and 22.3.

**1.29 COMMENT:** Table 1, Page 12: The table shows that both the All Wilderness and Partial Wilderness Alternatives will conflict with the Tooele County Master Plan which, as stated on Page 21, Land Use

Plans and Controls section, does not address any wilderness in the North Stansbury Mountains. The conflict, as stated in Table 1, may not exist except on paper. Since the Tooele County Master Plan is 14 years old, a revision by Tooele County updating the master plan may address a wilderness proposal, at least to include the Partial Wilderness Alternative. [George Hinde]

**1.29 RESPONSE:** See the responses to General Comments 2.20, 23.4, and 23.5.

**1.30 COMMENT:** We find the preferred alternative to be very compatible with our recently completed Forest Land and Resource Management Plans. Management direction for National Forest System lands adjacent to BLM's WSA is as follows: [U.S. Forest Service, Intermountain Region]

"Manage lands in the Onaqui Peak area to protect their roadless characteristics and other values associated with the adjacent Bureau of Land Management wilderness study area to the north."

Map 5 from the Forest Plan, entitled "Recreation Opportunity Spectrum," shows about 3,500 acres near Onaqui Peak to be managed in a semiprimitive nonmotorized condition. This determination was made as a result of a joint field analysis in 1982 between BLM District Manager and Forest Supervisor, in conjunction with appropriate staff from each office. We believe the Forest Service-BLM boundary is an illogical boundary for wilderness management. The Forest Plan, as it was developed through the NEPA process, left open the option to consider the Onaqui Peak area for wilderness should BLM's contiguous lands be designated wilderness. These lands will be managed as described above until an appropriate wilderness boundary is designated.

**1.30 RESPONSE:** BLM will not make a formal recommendation on the adjacent Forest Service lands as part of the wilderness review process for public lands. However, the Forest Service's position is explained and reported in the Affected Environment, Land Use Plans and Policies section and also in Volume I of the Final EIS. The potential for enhancing the wilderness experience in the area is discussed in the Wilderness Values sections. The FS's position will also be included in the Wilderness Study Report, which will accompany BLM recommendations.

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 1: NORTH STANSBURY MOUNTAINS WSA (CONTINUED)

**1.31 COMMENT:** The water rights held in Muskrat Canyon by a private individual and developed as such are not now, nor should be considered as a reservation of water for the BLM. If such is the case, the premise of the economic impacts within the Draft EIS for wilderness is seriously lacking. [Tooele County]

**1.31 RESPONSE:** BLM records indicate that no filing has been made for the water rights in Muskrat Canyon. In any event, wilderness designation would not affect the facilities established at the time of designation.

## SECTION 2 CEDAR MOUNTAINS WSA

**2.1 COMMENT:** BLM cites the presence of private lands as a management problem. In the inventory, the WSA boundary was drawn on the north and east to accommodate access by motor vehicles to these private lands. That is the reason the boundary fails to follow the significant imprints of man as the inventory policy requires. BLM concludes that these may not be a management problem since a land exchange is now planned for them. [Utah Wilderness Coalition]

**2.1 RESPONSE:** The boundary along the east side of the Cedar Mountains WSA was drawn along section lines, but also conforms with naturalness and eliminates roads and portions of fire rehabilitation projects in the lower foothills. Private in-holdings and split-estate land within the WSA could be a management problem. Land exchanges for the surface acres on private land in the WSA were made in September 1989. The State of Utah still retains the mineral estate. There are still sections of in-held private lands in the WSA. Also, see the responses to General Comments 3.35, 6.1, and 6.2.

**2.2 COMMENT:** The eastern boundary of this WSA travels in straight lines across the middle of hills and benches. A visitor would be perplexed on why the boundary goes down the middle of natural country. BLM chose to exclude the benches to facilitate potential range projects which are still yet to be defined. The inventory policy requires that the boundary be chosen based on the impacts of man. The boundary was to be drawn to the edge of these impacts to exclude the minimal amount of natural area as possible. BLM violated this requirement in drawing the boundary in the eastern part of this area. We request

that BLM correct this violation now that they are aware of it. [Utah Wilderness Coalition]

**2.2 RESPONSE:** See the response to General Comment 3.1 and Specific Comment 2.1.

**2.3 COMMENT:** BLM indicates that 18 miles of way may have to be signed, blocked, or patrolled to prevent ORV use. In making designations of areas open to all ORVs, limited, or closed, BLM consistently stated that areas like Cedar Mountains need not be designated closed or limited because they don't have a management problem. Now BLM reverses the argument to support a nonwilderness recommendation. If BLM put the same resources to ORVs that it gives to promoting Christmas tree cutting, forest removal by chaining, and mineral development, BLM would have the ability to manage ORV activity to protect wilderness resources. [Utah Wilderness Coalition]

**2.3 RESPONSE:** As noted in General Comment Response 21.1, ORV use is increasing. The manageability statements on ORV use for the Cedar Mountains WSA refer to the future. Also, see the response to General Comment 9.14.

**2.4 COMMENT:** Please consider the following comments in support of wilderness designation for the Cedar Mountains. [Sierra Club, Cache Group]

The WSA provides important wild horse habitat. We disagree with BLM's conclusion that the Cedar Mountains range is not scenic, has no outstanding primitive wilderness recreation, and provides solitude on only 10 percent of the land. We have found outstanding opportunities for primitive recreation and top quality solitude within a scenic and natural setting throughout this range.

BLM has not identified any conflicts within this area with potential wilderness designation.

**2.4 RESPONSE:** See the response to General Comment 3.1 which discusses the BLM Utah wilderness inventory phase and determinations of wilderness values. Appendix 11 in Volume I summarizes the rationale for the Proposed Action alternative.

**2.5 COMMENT:** Page 19 states that the Proposed Action ". . . includes all areas and acres currently judged by BLM to meet the test of suitability. Units may have low wilderness values, but no identified conflicts with other resources." I basically agree with

FEB 9 1993

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 2: CEDAR MOUNTAINS WSA (CONTINUED)**

this criteria; however, I wish to comment on how the criteria were applied. [John Veranth]

There are many areas where the Draft EIS identifies no conflicts with other resources which were not proposed for wilderness. These areas lack significant human imprints and are manageable as wilderness; therefore, by BLM's own criteria they should have been recommended. Specific examples include: the area between the road and the canyon rim in Mexican Mountain WSA, the entire Cedar Mountains range, large portions of the King Top WSA, the Cheesebox WSA, the south portion of the Scorpion WSA, much of Mount Pennell, etc. These and additional areas were discussed in previous letters.

**2.5 RESPONSE:** See the responses to General Comments 3.5 and 3.14.

**2.6 COMMENT:** BLM failed to consider an alternative which excluded conflicts from wilderness designation. BLM provides no good reason for not considering a Partial Wilderness Alternative. [Utah Wilderness Coalition]

**2.6 RESPONSE:** Because there are no significant conflicts with other resources, a Partial Wilderness Alternative was not analyzed. Although sections of private surface and State mineral estates conflict with wilderness management, these sections are scattered and could not be eliminated through a Partial Wilderness Alternative.

**2.7 COMMENT:** Recommending an area unsuitable for wilderness designation based solely on a rating of the mandatory wilderness characteristics violates the Wilderness Study Policy. As with other areas, BLM fails to consider special features, and limits wilderness activities to only a portion of the total number. Clearly, the distortion of an invalid rating system is used by BLM here in a manner violating the wilderness review policy. [Utah Wilderness Coalition]

**2.7 RESPONSE:** See the responses to General Comments 3.1, 8.11, and 22.5.

**2.8 COMMENT:** In the absence of any objective analysis leading to a logical conclusion, BLM's recommendation appears arbitrary and unsupported by the record. [Utah Wilderness Coalition]

**2.8 RESPONSE:** Appendix 11 in Volume I gives rationale for the BLM Proposed Action.

**2.9 COMMENT:** Many of the WSAs in the Great Basin region have been found unsuitable in spite of their significance in fulfilling all of the qualifying criteria for wilderness designation. The EIS finds that WSAs are not scenic, that the wilderness character is not as significant as in other areas, and so on. Two observations seem relevant. [Mark Peterson]

a. Wilderness designation is not a process of elimination. Each WSA must be assessed on its own merits.

b. Highly subjective reasoning (i.e., defining an area as scenic or not scenic) must be limited in favor of more empirical measures. The key criteria are whether an area meets the standards prescribed in the Wilderness Act and whether significant resource conflicts exist.

Accordingly, at least three WSAs should be found suitable for designation: Cedar Mountains, Conger Mountain, and King Top. All fulfill the essential criteria, possess outstanding opportunities for solitude, and an absence of substantial human impacts.

In addition to fulfilling these qualifications, these areas possess significant natural resources, including wild horses, fossil-bearing rocks, and important wildlife habitat. All of these areas are suitable for designation and should be recommended by BLM.

**2.9 RESPONSE:** See the responses to General Comments 3.14, 8.6, 8.22, and 19.1. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action.

**2.10 COMMENT:** The Cedar Mountains should be designated wilderness. The solitude is outstanding there, even though there is little vegetative screening. The views across the Salt Flats are so expansive and majestic that one would not be bothered by other people, even if there were any, which there seldom are. One would be bothered by machines, however. Recreation and scenic enjoyment could best be served and the wild horses could best be protected by designating 55,000 acres as wilderness. [John Lockhart]

**2.10 RESPONSE:** Appendix 11 in Volume I provides rationale for BLM's Proposed Action. Also, see the response to General Comment 3.1.

**2.11 COMMENT:** Once again, screening was used to determine solitude even though ". . . one choosing to spend a week in the WSA will probably not see

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 2: CEDAR MOUNTAINS WSA (CONTINUED)

another soul during the entire time" (SSA, Page 19). Yet, the claim is made that only 10 percent of the WSA meets the requirement for outstanding solitude! The main reason the WSA is not recommended for wilderness is also stated in the SSA, but not in the Draft EIS: ". . . there are several very similar WSAs in the Great Basin of Utah and Nevada" (SSA, Page 6). So what? It is up to Congress to determine if each land form is adequately represented when it passes wilderness legislation. BLM should not preempt a Congressional decision. Therefore, since ". . . there are no significant resource conflicts" (SSA, Page 6), the entire WSA should be recommended for wilderness designation. (Why weren't these SSA comments included in the Draft EIS?) [Owen Severance]

**2.11 RESPONSE:** See the response to General Comment 8.6 which addresses the role of BLM in making recommendations during the wilderness review process. The comments made on the SSAs were used for scoping of impacts and issues for the Draft EIS.

**2.12 COMMENT:** In the absence of a total understanding of the wilderness values, multiple use benefits from wilderness designation are not adequately known. BLM placed the stress on the mineral and non-wilderness resource inventories, giving the analysis a bias. This bias unfairly leads to a nonwilderness recommendation. The policy and the absence of inventories violates the planning regulations. This WSA clearly meets the standards described by the Wilderness Study Policy and should be recommended for wilderness designation. [Utah Wilderness Coalition]

**2.12 RESPONSE:** See the responses to General Comments 2.12 and 9.6 which discuss the wilderness review process and the need for data.

**2.13 COMMENT:** Wild horses are found in the Cedar Mountains. BLM has deleted all other significant wild horse areas in Utah from wilderness review in the inventory. Many of these deletions violated the inventory policy. BLM fails to assess whether other wild horse habitats are being recommended for wilderness designation. [Utah Wilderness Coalition]

We have identified a significant raptor nesting area on the western side of the boundary and offered this information to BLM. Other raptor nesting areas are highly likely to be found by a comprehensive inventory. BLM appears not to have used this information.

**2.13 RESPONSE:** Wild horses and raptor habitat are supplemental values considered in making wilderness recommendations. The EIS reports that these values are found throughout the Cedar Mountains range and well beyond the WSA boundaries. In fact, BLM data indicate that the number of wild horses is greater outside the boundaries of the WSA.

In this case, the supplemental values have been studied and their value weighed in development of the Proposed Action.

**2.14 COMMENT:** BLM fails to refer to completed inventories of wilderness values. Missing from both the text and the bibliography is a list of comprehensive inventories of rare and endangered species, wildlife, archaeological sites, and recreation activities. The detailed method and report required for each of these inventories is required by the planning process covered in BLM Manual. [Utah Wilderness Coalition]

**2.14 RESPONSE:** See the responses to General Comments 9.6, 13.1, 16.3, 16.4, and 20.2 which address the need for detailed resource inventories.

**2.15 COMMENT:** The impact analysis fails to analyze the off-site loss of wilderness values that would result from mineral development. [Utah Wilderness Coalition, et al.]

**2.15 RESPONSE:** See the responses to General Comments 8.10 and 9.4. The Final EIS projects no mineral-related disturbance for the Cedar Mountains WSA in the foreseeable future (see Appendix 6 in Volume I).

**2.16 COMMENT:** BLM indicates that phosphate is a potential conflict with wilderness designation. They admit that only 14,000 acres have this resource, and that the resource is ". . . not considered commercially productive at this time." BLM still has yet to determine the feasibility of development of mineral resources. This feasibility study is needed. [Utah Wilderness Coalition]

**2.16 RESPONSE:** See the responses to General Comments 9.4, 15.20, 15.22, 15.54, and 24.9. The Final EIS does not project any mineral development in the Cedar Mountains WSA in the foreseeable future.

**2.17 COMMENT:** The caveat concerning validity determinations under specific actions should be

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 2: CEDAR MOUNTAINS WSA (CONTINUED)**

dropped or clarified to state that validity examinations will be done for mineral patent applications only and not for development work and extraction of mining claims outside of a designated wilderness area. [Agency comment]

**2.17 RESPONSE:** The text of the EIS has been changed as suggested in the comment.

**2.18 COMMENT:** Page 4, All Wilderness Alternative: The term "prior and existing rights" is used in error in the narrative. The correct terminology is "valid existing rights." [Agency comment]

**2.18 RESPONSE:** The text of the EIS has been changed as suggested in the comment.

**2.19 COMMENT:** We believe the mineral potential of this area may be grossly underestimated in the Draft EIS. Field observations conducted in the area of Rydalch Canyon several years ago revealed the presence of iron-stained jasperoids along a major transverse fault. Tertiary intrusive rocks, thrust faults, and normal faults occur in proximity to this tear fault and each other. The general geologic setting is reminiscent of the Bingham mining district in the Oquirrh Mountain, except that the level of exposure is higher in any potential hydrothermal system. Thus, only the more distal portions of the system are exposed at present. Nonetheless, consideration of these geologic attributes within the framework of modern concepts of mineralization and alteration suggests a more optimistic assessment of mineral potential exists than is presented in the Draft EIS. We acknowledge the mineral potential south of Rydalch Canyon is somewhat greater than that north of it. [Mineral Land Research]

**2.19 RESPONSE:** The text has been changed to reflect the potential of the deposits described above. However, without actual assay data, the degree of certainty is still considered low.

**2.20 COMMENT:** Page 11, Wildlife, Paragraph 2: A limited number of antelope occupy the western portion of the WSA and should be added as a big game species in the area. [State of Utah]

**2.20 RESPONSE:** This information has been added to the Final EIS.

**2.21 COMMENT:** Page 18, Wildlife: Antelope should be added as animals that would be dispersed from the areas of localized disturbance. [State of Utah]

**2.21 RESPONSE:** In the Final EIS disturbance estimates have been reduced and impacts on wildlife are not analyzed in detail.

**2.22 COMMENT:** Page 18: The Draft EIS states in the No Action Alternative that ". . . mineral and energy development would not significantly disrupt wildlife in the WSA as a whole." BLM continues by saying that game animals would disperse, less mobile animals would perish or coexist at smaller population levels, and no significant long-term impacts are expected for any raptor species. There is no evidence presented for any of these statements. The lack of evidence makes the statement illogical because it is far from clear how, if animals disperse or perish, there could not be significant disruption of wildlife. [Scott Mills]

**2.22 RESPONSE:** See the response to Specific Comment 22.21. The initial sentence of the paragraph referenced in the Draft EIS explains that 316 acres of potential localized disturbance represent less than 1 percent of the WSA. The conclusion that this small percentage ". . . would not significantly disrupt wildlife in the WSA as a whole" appears reasonable. The Final EIS reports that no mineral-related disturbance is projected for the Cedar Mountains WSA in the foreseeable future.

**2.23 COMMENT:** Page 2, No Action Alternative: The eight sections of private lands with State-owned minerals are not discernable on Map 1. At first glance, it would seem there are 11 sections that meet this criteria. When comparing Map 2 to determine the WSA boundary, there seems to be six sections with State-owned minerals. The map needs to be made clearer. [Agency comment]

**2.23 RESPONSE:** The map has been revised. There were six sections and one 40-acre parcel with private surface and State minerals inside the WSA. An exchange in September 1989 resulted in four of these sections and the 40-acre parcel being converted from private surface with State minerals to Federal surface with State minerals.

**2.24 COMMENT:** Page 3, Map: Two 40-acre parcels (NW SE, Sec. 8, T. 3 S., R. 10 W., and SE, Sec. 17, T. 4 S., R. 10 W.) are shown as private land. These parcels are split-estate lands. The State owns the minerals. [State of Utah]



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 2: CEDAR MOUNTAINS WSA (CONTINUED)

**2.24 RESPONSE:** The maps have been revised in the Final EIS.

**2.25 COMMENT:** Page 4, All Wilderness Alternative, Paragraph 1: An inconsistency is noted in the content of this discussion. Page 2 mentions the acquisition of adjacent State lands, here it does not. [State of Utah]

**2.25 RESPONSE:** The paragraph referred to reports that State minerals would be transferred to Federal ownership by purchase or exchange.

**2.26 COMMENT:** The WSA meets the minimum wilderness quality factors but lacks special features and is not as spectacular as other West Desert WSAs. Other land use conflicts and economic and mineral potentials are considered to be significant enough not to be outweighed by the wilderness values. [State of Utah]

**2.26 RESPONSE:** Position noted.

### SECTION 3 DEEP CREEK MOUNTAINS WSA

**3.1 COMMENT:** The inventoried boundaries are not logical, and the inventory violated BLM guidelines. [Utah Wilderness Coalition, Cecil Garland, Glen Lathrop, and John Veranth]

a. I support wilderness of the Deep Creek Mountains, but I have a criticism of the Draft EIS because the boundary is placed too high on the Deeps. It should be dropped down to approximately the juniper line.

b. With almost no published justification, BLM deleted 31,000 acres of this unit that deserve wilderness study. We agree that approximately 23,000 acres are significantly impacted and should not be studied for wilderness designation. The justification used by BLM to make deletions has been found to be in error in appeals submitted on other wilderness inventory units. The decision on those units remained.

c. The boundaries need to be adjusted. The most natural boundary for the unit on the east side would be the base of the cliffs. Yes, this would include a few intrusions, but the unit needs to be protected as a complete unit. In the north, the boundary should include the area around North Pass Canyon to form a complete unit.

d. The low benches (almost all deleted from the WSA) are covered with diverse critical wildlife habitat. These benches, at an elevation of 4,500 feet, contain the shrubs and grasses necessary for winter support of the big game herds found in the high mountains.

Higher elevations especially show few signs of man and his activities, yet BLM deleted almost 20,000 acres of this rugged natural terrain.

BLM incorrectly deleted large natural areas because of outside sights and sounds or exaggerated the impact of a few widely separated impacts.

In the public comment period on the intensive inventory, the Utah Chapter of the Sierra Club submitted 5 pages of detailed comments on the natural areas in this unit. There is no written evidence that BLM responded to the information we provided or used it in making the final decision.

Those natural areas include the southern tip of the Deep Creek range west of Lime Mountain. The north and south walls at the mouth of Trout Creek and all of Dell and Middle Canyons are also deleted. The natural portions of the mountain range were deleted to convenient township lines on the north, northwest, and northeast. These deletions appeared chiefly designed to prevent State lands from being included within the WSA. There was no need for this deletion since the State is now proposing these lands in the whole range for exchange with BLM.

Lastly, BLM eliminated natural portions of the benches which form a critical element in the whole ecosystem of the Deep Creek range. BLM is incorrect in dropping portions of the unit based solely on the opportunities for solitude.

e. In the Deep Creek Mountains, the northern boundary should be drawn following topographical features at the base of the range. This would include the entire ecosystem.

**3.1 RESPONSE:** The juniper line is a difficult line to identify on a map and on the ground because of its width and because vegetation encroachment and retreat would change the boundary.

WSA boundaries were determined during the inventory phase of wilderness planning. The current

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)

phase is to determine whether or not a WSA is suitable for wilderness designation.

Boundaries established for the Deep Creek Mountains WSA and subsequent recommendations (Partial Wilderness Alternative) were based on the criteria within BLM Intensive Wilderness Inventory and Study Policy (USDI, BLM, 1980 and 1982b). Areas excluded are generally the sagebrush benchlands without outstanding wilderness values, adjacent State land sections bordering the WSA, and/or areas containing potentially high mineral values.

Most, if not all, of the acreage not included in BLM's Proposed Action was excluded because of high mineral potential, as explained in Appendix 11. "Large natural areas" were not deleted because of sights and sounds, but because of minerals known to exist in the north end of the Deep Creek Mountains.

A check of scoping correspondence indicates that 3 pages of comments were submitted during scoping; all 3 dealt with the questions answered above. The lower unscreened benchlands have neither outstanding opportunities for solitude nor primitive and unconfined recreation.

All available habitats are not necessarily included in the Proposed Action, only those in areas considered by BLM as suitable for wilderness designation.

See the responses to General Comments 3.1, 3.12, and 6.3 for further information and clarification on the BLM wilderness review process and the State of Utah's position on State land exchanges in wilderness areas.

**3.2 COMMENT:** In terms of wilderness qualities and biological values which enhance those wilderness qualities, we suggest adding all of the acreage between the proposed wilderness north of Goshute Canyon following the WSA boundary on the west, to and including Blood Mountain, and then west above Pass Canyon to State Section 16. These additions, probably around 10,500 acres in size, would protect at least two critical springs, some of the most important winter range for wildlife species, and provide meaningful diversity to the ecological nature of the range. By protecting the alluvial landforms along the entire east slope of the range, the potential for habitat fragmentation, from a biological standpoint, is significantly reduced. Pass Canyon also represents important riparian habitat on the Tooele County side of the range.

This area is also the location of the plant species considered for threatened or endangered listing and will likely be the regions where similar unique and sensitive plants are found. [Utah Wilderness Association]

**3.2 RESPONSE:** The area mentioned in the comment is not included in BLM's Proposed Action because of known mineral values (refer to Appendix 11 in Volume I). The alluvial slopes along the east side of the WSA were dropped during the intensive inventory because they lacked outstanding opportunities for solitude and primitive recreation. Also, see the response to General Comment 3.1.

**3.3 COMMENT:** Vehicle access into the WSA is creating problems and should be closed. [Wasatch Mountain Club and George Douglas]

a. Some problems on the Deep Creek Mountains include erosion created by vehicles driven on trails, making the ways impassable for everyone. In the interest of minimizing conflicts with mining claims, we support BLM's proposed Partial Wilderness Alternative, coupled with the closing of vehicular access up Trout Creek, Granite Canyon, and other drainages. We recommend establishment of parking areas at the mouths of these canyons. We also support the proposed private land exchange in the central Deep Creeks to make a more coherent and manageable wilderness area.

b. I would suggest that the necessary road closures be made positively. The small cable put up to close Granite Canyon for the winter a few years ago was taken down almost immediately by Christmas tree poachers. There are plenty of huge boulders in the area that could be strategically placed to do the job.

**3.3 RESPONSE:** The greatest amount of erosion on jeep trails, ways, and roads within the Deep Creek Mountains has been caused by surface runoff from snowmelt and rain. Most of the jeep trails, ways, and roads have not been mechanically maintained to avoid degradation of wilderness values. This lack of mechanized maintenance has allowed surface runoff to channel down roadways instead of roadsides.

About 10 miles of existing ways and jeep trails would be closed to use under the Partial Wilderness Alternative, including Trout Creek and a portion of Granite Creek. Parking areas and other amenities will

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

be outlined in the Wilderness Management Plan for each area designated wilderness.

The Basin has been acquired by BLM through exchange.

The cable system installed in Granite Canyon was an interim measure taken to close the canyon during periods when vehicular traffic would impair resource values on or adjacent to the roadway. The cable system was reinstalled immediately after it was taken down.

If the Deep Creek Mountains are designated wilderness, a Wilderness Management Plan will specify the location and means of road and/or way closures. Boulders could be used to ensure a more permanent closure.

**3.4 COMMENT:** BLM recommendation, Partial Wilderness: BLM dropped from wilderness consideration seven peaks higher than 7,000 feet, and the critical wildlife habitat on the eastern benches. BLM has worked to exchange The Basin, a piece of adjacent private land, to add it to the proposed wilderness area. [Utah Wilderness Coalition]

**3.4 RESPONSE:** Elevation is not a wilderness criterion. The northern end of the WSA is excluded in the Partial Wilderness Alternative because of known mineral values. Benchlands along the southeastern boundary of the WSA are excluded in the Partial Wilderness Alternative because they lack outstanding wilderness values. The effects of each alternative on wildlife are analyzed in the Final EIS.

**3.5 COMMENT:** The Deep Creek Mountains WSA has the highest wilderness value of all the West Desert WSAs. However, potential mineral development, present and proposed water developments, and wildlife issues present conflicts. Further analysis of the mineral potential is necessary, as well as resolution of the wildlife issue concerning chemical treatment of water and stream stabilization to eliminate rainbow trout from Trout and Birch Creeks. The State supports designation of the Deep Creek Mountains as an ONA. This recommendation was included in the State's comments on the House Range Draft RMP/EIS. [State of Utah]

**3.5 RESPONSE:** The wilderness, mineral, and other values of the Deep Creek Mountains WSA are analyzed in the Final EIS. Chemical treatment of Trout and

Birch Creeks to benefit the Bonneville cutthroat trout was done in December of 1983 and may continue following wilderness designation.

Under the present RMPs and BLM's No Action/No Wilderness Alternative, the Deep Creek Mountains WSA would be designated an ACEC/ONA.

Also, see the responses to Specific Comments 3.27 and 3.28.

**3.6 COMMENT:** The Deep Creek Mountains WSA has high wilderness quality and should be proposed as wilderness until the known mineral values are needed. [George Douglas and Michael Van Note]

a. As the oil glut we are now experiencing continues, the existing oil and gas leases look less and less promising. It makes sense to let these leases expire and make the area wilderness. If, at a later date, these mineral and energy sources are needed, Congress can grant new leases; however, in the meantime, wilderness values will be protected for future generations.

b. Given the extreme unique wilderness values of this range, it would seem that the All Wilderness Alternative, as indicated in the Statewide Paramount Wilderness Quality Alternative, would make sense. The nearly 18,000 acres eliminated in BLM's Proposed Action include some of the most rugged country in the WSA. I would suggest that much of this acreage could easily be included in the Partial Wilderness Alternative. The remaining acreage should be open for a limited time for exploration and extraction of minerals. If no active mining is pursued within a reasonable period of time, then the remaining acreage would be included within the wilderness area. Let's face it, the wildlife diversity alone should warrant the maximum acreage for the wilderness, especially considering the endangered and threatened species there. I would give mineral interests their chance (5 to 10 years) to make a show or give it up. Again, the acreage temporarily eliminated from wilderness should be managed during that time to protect its wilderness values, except as necessary for exploration or mining.

**3.6 RESPONSE:** See the response to Specific Comment 1.6.

**3.7 COMMENT:** Page 17, Geology, Paragraph 1: The document states that ". . . the northern half of

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

the range differs markedly from the southern half, although some common geologic structures are evident along the entire range." No further information is given on what is in the northern or southern half, or what is common. The only rock unit discussed is the granitic intrusive in the middle of the range. This section should be considerably expanded. [State of Utah]

**3.7 RESPONSE:** The Geology and Topography sections of the EIS have been revised and clarified.

**3.8 COMMENT:** Page 17, Vegetation, Paragraph 4: What information is available about the age of the bristlecone pines in this WSA? [State of Utah]

**3.8 RESPONSE:** As noted on Page 25 of the Deep Creek Mountains WSA analysis, Special Features section: "Three stands of bristlecone pine have been found in the WSA, but the approximate ages of these trees have not yet been determined." Some inference can be made by the reference to the Methusala Grove. Also, see the response to General Comment 13.14.

**3.9 COMMENT:** Page 17, Vegetation, Paragraph 7: Penstemon nanus is not found in this area. It was misidentified early on in BLM's wilderness review process. The correct species is Penstemon dolius (Welsh, 1986). [State of Utah]

**3.9 RESPONSE:** See the response to General Comment 13.9.

**3.10 COMMENT:** Mining in the Deep Creek Mountains WSA is not economically feasible and should not be used as rationale to drop any acreage from the Proposed Action. [Utah Wilderness Association and George Douglas]

a. In 50 years of mining, the Deep Creek Mountains have produced some \$750 thousand to \$1 million of minerals. This is inconsequential, and it is noted in previous SSAs and within the analysis of the Draft EIS that an All Wilderness Alternative will have little impact on the socioeconomics of the region. Obviously, this is true since the mineral values seem to concentrate themselves on the northern periphery of the range--generally outside of the WSA. The mineral ratings and potential development noted in the Draft EIS just don't justify the removal of such a large portion of the range from wilderness consideration. Our suggestion is to include, at the minimum, the land noted in this comment so that it will go forward through

the USGS/USBM mineral survey given suitable areas. At that time, a determination of substances, rather than the guesswork by BLM, can be made on actual mineral values with any resulting decrease in acreage at that time. Right now it is simply premature.

b. The objection to the All Wilderness Alternative seems to revolve around mineral and energy resources. For 14 years I have worked in the mineral industry a few miles to the north of the WSA in Gold Hill. My experience there gives me a good insight into the workings of this highly speculative industry.

The conflicts with the minerals noted in the Draft EIS appear centered around the existing patented claims and outside the WSA on the very northern tip. These priority additions "compete" minimally with the potential mineral value of the area. Obviously, that value is even in question.

For example, though the area is rated as moderate to high for copper or lead, previous mineral studies produced during the initial SSA phase of the BLM review showed both resources to occur in very small quantities. The Draft EIS concludes gold and silver are both likely to occur in small quantities within the WSA. Tungsten is primarily located on the southern edge of the WSA, and uranium is all but nonexistent. Thus, the potential for mineralization exists for beryllium and molybdenum. In the latter, the Draft EIS simply notes because molybdenum is found in similar rocks in the West Desert, the potential is high in the Deeps. That is hardly acceptable to make a land tradeoff in the name of an "undetermined" or "unknown" (both of these words are used as the descriptors for molybdenum in the Draft EIS) resources. Beryllium is also a very small resource in terms of quantity and is found primarily adjacent to the range on the south--hardly justification for removal of the northern and eastern reaches.

**3.10 RESPONSE:** See Appendix 11 in Volume I and the responses to General Comments 2.33 and 15.1.

**3.11 COMMENT:** Most of the located or unpatented claims in the area (and on most of BLM land) are being held fraudulently. Very few claim holders actually do their assessment work, but simply file the necessary paperwork with the county recorder stating that they did. These people know that no one is going to check anyway. [George Douglas]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

**3.11 RESPONSE:** Under existing law, all mining claims are considered valid until challenged. The accusations made in the comment are not documented or verified and cannot be used as a basis for analysis in the Final EIS. See the response to General Comment 15.30.

**3.12 COMMENT:** Page 33: In the section dealing with locatable minerals, I strongly urge that the following sentence be deleted: "Although development of existing valid claims would be possible, the cost of development would be greater." While this statement is true, BLM should be concerned with the management of its lands in such a manner as to minimize the adverse effects of any development, not to ensure that any developer realizes a maximum profit. [George Hinde]

**3.12 RESPONSE:** The section mentioned above describes potential impacts to mineral exploration and development as a result of wilderness designation. As such, this statement fulfills a mandatory analysis requirement of NEPA. The statement is not intended to show that a developer should realize a maximum profit.

**3.13 COMMENT:** In the last several days I received some information from the Utah Mining Association, and also from another individual--I'm not at liberty to divulge that person's name--indicating that there is great potential in the Deep Creek Mountains area for mineral development, especially one particular mineral. We believe if there is any possibility at all that this would bring some sort of development into Juab County wherein we can employ our people; this would be uppermost in our consideration and supports our opposition to the wilderness proposal. [Juab County Commission]

**3.13 RESPONSE:** The mineral potential in the Deep Creek Mountains has been known for some time and is reported in the EIS. The Partial Wilderness Alternative is BLM's Proposed Action because it excludes areas of known and potential mineral deposits.

**3.14 COMMENT:** Page 13, Locatable Minerals: This section does not state that mines exist less than 0.5 mile from the WSA boundary, and that workings from this mine might trend under the WSA. Also, disseminated gold potential in carbonates is not discussed. [State of Utah]

**3.14 RESPONSE:** The presence of gold and silver adjacent to the WSA and the potential for disseminated deposits inside the WSA are discussed in the Final EIS.

**3.15 COMMENT:** Page 13: The narrative implies that validity examinations will be done on mining claims in the area not being recommended for wilderness designation. This is incorrect. [Agency comment]

**3.15 RESPONSE:** The comment is accurate. The description of alternatives has been changed as suggested. Also, see the response to General Comment 15.29.

**3.16 COMMENT:** The discussion of gold and silver resources raises yet another question concerning objectivity. The discussion includes the following statement: "because of the proximity of known mines and the historic production of the mining districts in the area, BLM and industry representatives rate the favorability high for the WSA." The statement raises the question of the role of industry in a supposedly independent assessment. Are the environmental groups correct in charging that industry has special influence within BLM? Statements like the one above do little to relieve the natural fears of the environmentalists. Unless it is clear what industry contributed, doubts about its influence will persist. [Art Voelker, SAI]

We also tried to use industry input in our assessment and found that the natural reticence of the mineral industry to reveal assessment results kept it from supplying us with little more than assurances of high value without much proof. I am fearful that the BLM geologist who wrote the statement above had no more substantive information than we obtained. Ideally, if new and better information exists, it should be made available to all interested parties by means of the EIS. At a minimum, the EIS should include references to new material used in the assessment and not listed in the SAI documents.

**3.16 RESPONSE:** See the response to General Comment 15.52. Comments were solicited from all interested parties. Also, see the responses to General Comments 8.25 and 15.19 that deal with the use of proprietary information.

**3.17 COMMENT:** The EIS statement describing gold and silver shows confusion on the part of BLM

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

geologists of the differences between favorability and certainty. Favorability is an attribute of the geologic setting, while certainty is a measure of proof that resources actually exist in the WSA. Thus, proximity of known mines and historic production are data used to judge the certainty, and not the favorability as indicated. [Art Voelker, SAI]

**3.17 RESPONSE:** See the response to General Comment 15.8.

**3.18 COMMENT:** BLM's revisions of SAI's mineral ratings should be justified and the methodology presented in the EIS. [Utah Wilderness Association, Bruce Pendery, and Art Voelker, SAI]

a. The mineral assessment for the Deep Creek Mountains should be corrected. The overall effect of BLM adjustments has been to increase the ratings of the WSA. This makes it important to verify the increase and document the reasoning used. I suggest that you have the ratings reviewed as a group by an experienced geologist on your staff or a consultant, with the charge of checking for consistent application of the assessment method and for sufficient justification of assigned ratings. The individual given this charge should read my examples to understand some of the possible problems.

b. Ratings generated by BLM for minerals not evaluated by SAI are not treated much better. The f4 rating for beryllium is explained in the following manner: "This mineral occurs in the vicinity of the Trout Creek mining properties (Thomas, 1973). Although there is no production within the WSA, the favorability appears to be high, based on the geologic characteristics of the Deep Creek Mountains and known beryllium deposits in other locations within Utah's West Desert." This statement doesn't merit an f4 under our assessment method as formally endorsed by BLM. This example highlights another problem with the EIS. BLM apparently hasn't created rating level definitions for minerals not considered by SAI, else they failed to include them in the EIS. As a result, the reader doesn't know the criteria used by BLM geologists in determining favorability and certainty. It is very likely that the ratings are inconsistent with those appearing in other sections of the EIS.

c. To assess the potential of land to contain mineral resources in public policy debates is to use verifiable facts and credible geologic interpretations and mineral assessments that are part of the open literature. The BLM geologist who updated and modified the

SAI assessment of Deep Creek Mountains may not have been very diligent in pursuing this procedure. Let me be more specific. SAI assigned an OIR of 2+, a fairly low rating to the Deep Creek Mountains WSA because it occurs in a geologic province unlikely to contain significant energy resources, and because published sources failed to support high potential for the critical minerals BLM asked SAI to evaluate. Based on consideration of more minerals and further information on gold, silver, and copper, BLM increased the OIR of the WSA to 3+, a very high rating.

One would expect that the change from a low to a high rating would require an appropriate justification, as SAI originally developed for the ratings. Instead, we find almost no justification for the modifications, and little discussion of minerals not evaluated by SAI. For example, the favorability rating for copper has been increased from f2 to f3, and the certainty rating increased from c3 to c4. "Scattered occurrences of copper exist within and near the WSA (SAI, 1982; Thomas 1973). Consequently, the favorability for copper is considered moderate." This terse statement doesn't justify an increased rating, especially since SAI is the primary reference.

d. Why did BLM push the mineral favorability rating up one whole point to 3+, when the SAI study showed the area at only 2+? Only the statement is given that it was BLM's opinion to do so. What is the justification?

e. The only significant resources that would be impacted by wilderness designation are locatable minerals. These minerals are not as important as wilderness protection in my view! Also, I take strong exception to BLM's handling of this in the EIS. Your standard survey used as the baseline indicated mineral potential was not too high in the Deep Creeks. Apparently this did not satisfy BLM, because another assessment of minerals potential was done, this one indicating higher mineral potential. It seems as though once you didn't get the right answer the first time around, you did it again. This seems arbitrary and capricious. BLM should stick with one standardized mineral assessment scheme. Even if it is imperfect, at least it would be standard.

**3.18 RESPONSE:** The mineral analyses have been corrected and updated. Because the OIR was confusing, it has been eliminated in the Final EIS, and individual minerals have been rated on their own merits.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

Also, see the responses to General Comments 15.1 and 15.4.

**3.19 COMMENT:** BLM cites mineral conflicts. The mineral analysis is broad and general, without any specific information about which portions of the WSA have mineral potential and which do not. No maps with this information are present. BLM appears to rely mostly on the presence of mining claims as indicators of conflicts. In the past, mining claims have not proved valid in a majority of cases. BLM needs to produce: (1) a list of the claims; (2) their location; (3) a record of the mineral value that the claim has proven to exist; and (4) a record of physical continued work on the claim. If this cannot be given, then the claim cannot be used as a conflict. We request this information be included in the Draft EIS. Likewise, BLM makes no objective estimate of the presence of a commercially feasible mineral deposit. BLM ignores extensive exploration which has not revealed a sizable deposit or quality which can be mined for a profit. Failure to assess the feasibility of development makes it impossible to assess if there is a real conflict or not. [Utah Wilderness Coalition]

**3.19 RESPONSE:** See the responses to General Comments 9.10, 15.11, 15.20, 15.22, 24.9.

**3.20 COMMENT:** The EIS should report on the full range of mineral values in the WSA and use all of the available literature and information. [Mineral Land Research and Utah International, Inc.]

a. Field observations, geochemical sampling and analyses, and in-depth literature research of the Deep Creek Mountains area indicate the presence of anomalous mercury, arsenic, antimony, copper, lead, zinc, barium (as barite), silver (up to 26 ounce/ton), and gold mineralization associated with silicic alteration at several localities within the WSA. These minerals have been mined within and adjacent to the WSA in historic times (Beckman and Kearns, 1965). The area has long been recognized as having high mineral potential. Significant mineral production has occurred from the Gold Hill-Clifton mining district to the north of the WSA, and from less prominent but nonetheless important smaller mining districts along the eastern, southern, and western boundaries of the WSA. Mining was being conducted on at least one property north of the WSA as recently as the summer of 1985 (Crawford and O'Farrell, 1982).

b. Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits, and that it should, therefore, be eliminated from consideration as a wilderness area. The following information is given for BLM's consideration.

The WSA has historic and recent production of gold, silver, lead, zinc, copper, bismuth, iron, mercury, barite, antimony, arsenic, and tungsten.

Numerous road and jeep trails, cabins, mines, and mining ruins on the eastern and western edges of the WSA are related to previous mining activities.

The WSA has high potential for future development and production of gold, beryllium, silver, lead, zinc, copper, molybdenum, iron, barite, antimony, mercury, arsenic, and tungsten from sedimentary and intrusive rocks, especially in the northern half and southern third.

**3.20 RESPONSE:** This information is recognized in the Final EIS; BLM's Proposed Action excludes most of the potential mineral development areas, as well as the substantially noticeable imprints of man. See the response to General Comment 15.1.

**3.21 COMMENT:** Consideration of modern concepts of hydrothermal mineralization and vertical and lateral zoning of alteration and mineralogy indicate the WSA possesses high potential for commercial mineralization. Lack of discovery stems primarily from lack of recognition and information, lack of systematic exploration utilizing modern concepts and methods, low metal prices, weak metal demand, and the worst recession in the mining and energy industries in the 20th century rather than from any lack of potential. Lack of mineral occurrences and/or insignificant past production (or its absence) cannot be used to assess potential with any degree of confidence. Were this so, the major discoveries of the past 20 years in gold, silver, uranium, copper, and molybdenum would not have been made in the little known mining districts of the western U.S. [Mineral Land Research]

**3.21 RESPONSE:** See the responses to General Comments 15.1 and 15.4.

**3.22 COMMENT:** Two high potential mineral properties occur either within or contiguous to two Utah BLM WSAs: namely, the North Stansbury Mountains and the Deep Creek Mountains. It is our intent to continue exploration in these two high potential areas,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

utilizing surface mapping and geochemical sampling. Pending results comparable to those already obtained, both properties will be drilled and developed within the next 3 to 5 years, and discovery of an ore deposit. We will be glad to share our proprietary observations, data, and literature research with BLM geologists at a mutually agreed-upon time and place, if such will be retained in confidence. [Mineral Land Research]

**3.22 RESPONSE:** See the response to Specific Comment 1.19. The Final EIS projects that exploration for and development of mineral resources will occur in the foreseeable future in the Deep Creek Mountains WSA (see Appendix 6 in Volume I).

Also, see the responses to General Comments 8.25 and 15.9 which discuss proprietary information.

**3.23 COMMENT:** In the specific issues identified in the Scoping section, Comment 14 mentions that two small hydroelectric generating units have been proposed. There are, in reality, three. Nowhere in the discussion is ours mentioned. [George Douglas]

We were granted a temporary right-of-way in November 1983 and were diverting water through the system as of April 1985 for irrigation. We were informed that the WSA boundary would be shifted to the west in Section 14 and in Township 12 South, Range 18 West so that BLM could grant us a permanent right-of-way. This did not show up in the Draft EIS either. We received a copy of the Federal Register and Errata Sheet on April 4, 1986. The Errata Sheet does clarify our boundary concern, and we assume that objection is taken care of.

**3.23 RESPONSE:** BLM cannot adjust the WSA boundary to accommodate projects. All lands inside a WSA are managed to preserve their wilderness values until Congress determines which lands will be designated wilderness. However, BLM's Proposed Action analyzed in the Final EIS places the wilderness boundary west of the temporary right-of-way. This would exclude the temporary right-of-way from the wilderness area. The proposed hydroelectric unit is not within the WSA. A pipeline for the unit is in place and would be abandoned in place if Congress were to select the All Wilderness Alternative.

**3.24 COMMENT:** Page 72: The size of the Rocky Mountain bighorn sheep population will not remain constant. In reference to the Deep Creek Mountains WSA,

what is a "particularly high cougar population?" [George Hinde]

**3.24 RESPONSE:** The narrative of the EIS does not refer to the cougar population of the Deep Creek Mountains as "particularly high." The planned population of bighorn sheep has been added to the text of the Final EIS.

**3.25 COMMENT:** As a range specialist and wildlife biologist, I am concerned about the 500-acre seeding mentioned in the EIS. If the Partial Wilderness Alternative is adopted as BLM recommends, several thousand acres of deer winter range would be in areas open to mining. Could the 500-acre seeding make up for this potential loss both in terms of quantity and quality of winter-available forage and in terms of being located in an area used by deer for winter range? This should be considered quite carefully. Mule deer could very possibly benefit more from protection of their winter range on the north end of the Deep Creek Mountains than from a seeding. [Bruce Pendery]

**3.25 RESPONSE:** The seeding was not designed as mitigation for potential impacts to winter range from mining developments on the north end of the WSA. As stated in the Draft EIS, the seeding would not have been possible with BLM's Proposed Action. The effects of each alternative on wildlife are analyzed in the Final EIS. Actual loss of deer winter range is projected to be small in the foreseeable future.

**3.26 COMMENT:** Page 21, Wildlife, Paragraph 1: The estimated number of 460 mule deer inhabiting the Deep Creek Mountains is low in view of the fact that 401 bucks were reportedly harvested on Deer Herd Unit 62A in 1984. Most of those would have come from the Deep Creek Mountains. [State of Utah]

**3.26 RESPONSE:** According to the revised wildlife numbers found in the Final EIS/RMP for the House Range Resource Area, the Richfield District portion of the Deep Creek Mountains WSA would contain approximately 600 to 700 deer on a yearlong basis (USDI, BLM, 1987a). In addition to the Deep Creek Mountains, Herd Unit 62A also contains Fish Springs and Thomas ranges. Harvest data from UDWR does not break down the harvest by mountain range, so analysis to determine the specific area of harvest is not possible.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

The Final EIS indicates that there are 900 to 1,000 mule deer inhabiting the Deep Creek Mountains WSA on a yearlong basis.

**3.27 COMMENT:** Page 23, Recreation, Paragraph I: Attempts have been made in the past and are continuing by UDWR to eliminate rainbow trout from Trout and Birch Creeks and manage them only for Bonneville cutthroat trout. [State of Utah]

**3.27 RESPONSE:** Fishing in the Deep Creek Mountains WSA is rated as average or below average in quality due to the closure of Birch and Trout Creeks to fishing. This prohibition is necessary to allow the UDWR to reestablish Bonneville cutthroat trout in these streams. The attempt to reestablish the fish will limit fishing opportunities in the WSA. These objectives and actions are consistent with the BLM Wilderness Management Policy (USDI, BLM 1982b), which states that native species should be favored in waters with a history of supporting such species.

**3.28 COMMENT:** Page 1, Response to Comment 3: The response states that chemical treatment of water, stream stabilization, and enhancement would probably be allowed if wilderness protection criteria could be met. Some, if not all, of those activities will be necessary in Birch, Trout, Granite, Red Cedar, Indian Farm, and Tom's Creeks for UDWR to reestablish and manage Bonneville cutthroat in those streams as planned. [State of Utah]

**3.28 RESPONSE:** Draft EIS, Page 30, No Action Alternative section, states that chemical treatment of waters could occur to manage Utah cutthroat trout populations. The same statement is repeated in the All Wilderness Alternative section. Chemical treatment of waters would be permitted if wilderness protection criteria could be met. BLM believes that the criteria can be met. However, future actions would be analyzed under NEPA.

**3.29 COMMENT:** With the exception of forest resources, all other considerations would have a positive benefit from the All Wilderness Alternative. It is very doubtful that anything would be done with forest products because of the remoteness of the area, the small number of board feet involved, and the low quality. [George Douglas]

**3.29 RESPONSE:** The Final EIS recognizes the low probability and feasibility of timber harvest from the Deep Creek Mountains WSA. Under present conditions,

timber or other woodland products in the WSA cannot be cut, transported, and marketed profitably. There is a lack of good quality timber, and low volumes and densities in all size classes create a less than worthwhile benefit-cost ratio. In addition, the House Range RMP closes the area to commercial timber harvest.

**3.30 COMMENT:** Page 34: "Vehicle access for livestock permits would be regulated to infrequent trips into the WSA." This statement is too general since it depends upon the meaning of the word infrequent. What is infrequent to some may be altogether too frequent for others. This statement also shows favoritism. Wilderness areas are closed to ORV use by the public and, although ranchers are part of the public, they would be allowed to use ORVs within wilderness areas. Even if occurring infrequently, ORV use in wilderness areas should not be allowed for anyone. [George Hinde]

**3.30 RESPONSE:** Generally, motorized access for livestock management in wilderness areas would be closely controlled. This is discussed in detail in paragraphs 2 and 5 of the excerpt from House Report 96-1126 included in Appendix 1, Part A, of the Draft EIS. The language of the report indicates that "occasional" use of motorized equipment may be authorized but should be expressly authorized in the grazing permits issued for the area involved. The use of vehicles is to be based on practicality and necessity, prior use, and reasonableness. Management prescriptions will be determined through BLM's RMP process and implemented through AMPs and Wilderness Management Plans prepared for the area if it is designated wilderness. The EIS recognizes that control of access would be an inconvenience for livestock operators.

**3.31 COMMENT:** We run sheep along the side of the Deep Creek Mountains and come down over the side of the canyon and have permits on the west side of the Dugway Mountains and along Fish Springs. With the Army on one side of us protecting--they don't protect predators. They try to get them. But at least you are not allowed control in there. And the air base is there. Then you have all these wilderness areas on the other side. Without adequate predator control, we would be out of business. [Utah Wool Growers]

**3.31 RESPONSE:** Wilderness designation in either the Deep Creek Mountains or the Fish Spring Mountains would not unduly restrict predator control operations in the area. The following statement summarizes the predator control policy within and outside of

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

designated wilderness areas: "In wilderness areas, control would be allowed to protect threatened or endangered wildlife species or, on a case-by-case basis, to prevent special and serious losses to livestock, but only under conditions that would ensure minimum disturbance to wilderness values. Poison baits or cyanide guns would not be allowed." The majority of sheep use occurs outside the potential wilderness areas. There would be no restrictions on the use of poison baits or cyanide guns outside designated wilderness areas; predator control would continue under regulations and policies of the Animal and Plant Health Protection Service (APHIS). In Volume I, Chapter 2, the Alternatives Analyzed section gives a clear statement on predator control. Similar wording has been added in the Introduction to Volume II. Also, see the responses to General Comments 3.27 and 16.10.

**3.32 COMMENT:** The statement that most available forage for livestock inside the WSA is in the canyon bottoms and adjoining side hills; and the statement that the terrain is so rugged that cattle are limited to canyons where water is available, are good reasons to decrease the number of grazing AUMs in any wilderness area. Wilderness designation is designed to preserve the quality of the area, and concentrating livestock also concentrates and maximizes the adverse effects to the environment by livestock. These two statements in the Draft EIS also indicate that VRM Class I standards are not being kept since concentrated livestock grazing cannot be called a natural ecological change. [George Hinde]

**3.32 RESPONSE:** Regulations and restrictions related to rangeland management are discussed in Appendix 1 in Volume I and the Wilderness Management Policy (found in 43 CFR 8560). Generally, there would be no change in normal livestock management administration. Any adjustments needed in wilderness areas would be made as a result of the normal grazing and land management planning and policy setting processes. Consideration would be given to legal mandates, range conditions, and protection of the range resource. Monitoring and AMPs would determine the need for any adjustments. These plans, in conjunction with the Wilderness Management Plan, would address the standards to be kept.

Also, see the responses to General Comments 18.2 and 19.5, which discuss the relationship of livestock grazing and wilderness designation.

**3.33 COMMENT:** Here in Utah outdoor recreation is the most important industry. Hunting and fishing alone generated over \$675 million in receipts in 1984. The All Wilderness Alternative would benefit these activities. One landowner in Ibapah is planning a commercial outfitter operation, others could follow. This would be a nice augmentation to the subsistence income from cattle ranching. [George Douglas]

**3.33 RESPONSE:** Recreation in the Deep Creek Mountains would not be significantly affected by wilderness designation. ORV use in the area is limited by terrain and ORV closures under the House Range RMP and Tooele MFP. Mining would probably be in the north end of the WSA. Future commercial operators could use the area with or without wilderness designation. In any event, the bulk of the money spent on services would not be spent in the vicinity of the WSA because few services are available.

No commercial outfitters presently use the area, and no applications for commercial use are on file with BLM. Also, see the responses to General Comments 21.19, 24.8, and 24.17.

**3.34 COMMENT:** Six hundred plant species grow in the Deep Creek Mountains, and BLM lists 185 species of birds. In the Utah State curriculum guide for science, the study of Utah animals, wildlife habitats, ecosystems, and food chains are major areas of study. I believe outdoor experiences in the Deep Creek Mountains are a very good background for me as a teacher. [Ellen Davis]

**3.34 RESPONSE:** The Deep Creek Mountains contain some very interesting and unique plants and animals. The description of wilderness values in the EIS notes that special features add to the scientific and educational value of the Deep Creek Mountains WSA. Wilderness designation would provide some protection for vegetation because the potential for surface disturbance would be reduced.

**3.35 COMMENT:** BLM fails to provide specific information on which part of the unit has the required wilderness characteristics and which has more than the required quality. A map needs to be provided. BLM cites no methodology for determining this, and no description is given on which areas have these different ratings. This process of arbitrarily rating an area is in violation of the study process. BLM should delete this process from the Draft EIS. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 3: DEEP CREEK MOUNTAINS WSA (CONTINUED)**

**3.35 RESPONSE:** The proposed Partial Wilderness Alternative includes those areas within mandatory wilderness characteristics minus those areas with potential for mineral conflicts. The determination of mandatory wilderness characteristics is based on the definition of outstanding as explained in the Glossary in Volume I. Also, see the responses to General Comments 3.1, 8.11, and 22.5.

**SECTION 4**  
**FISH SPRINGS WSA**

**4.1 COMMENT:** In the inventory, this unit was reduced from 68,910 acres to its present size of 52,500 acres. While mining activities do impact a portion of the northern end of this range, the area deleted included a large portion which deserved wilderness study. [Utah Wilderness Coalition]

**4.1 RESPONSE:** See the response to General Comment 3.1, which discusses BLM's wilderness inventory of public lands in Utah.

**4.2 COMMENT:** The deletion of land from the study is not clearly explained in the Draft EIS. BLM lists a set of intrusions (ways, livestock improvements, patented mining claims, and a spring). No map lists the location and no text supports the significance of these intrusions. Some of these are human facilities allowed in designated wilderness areas. The lack of information inadequately supports BLM's conclusion and makes detailed comments impossible. If human impacts are used to justify deletions from this unit, descriptions of these impacts with maps showing their location are required. These same impacts were found to be insignificant in the inventory. [Utah Wilderness Coalition]

BLM categorically removed mountain benchlands from its wilderness recommendations. Exaggeration of human imprints is not the only argument used to justify their deletion. Lack of solitude is another favored argument used on this area. By requiring outstanding opportunities for solitude to occur in every portion of the recommended area, BLM falsely applies the Wilderness Study Policy. BLM incorrectly limits the assessment of wilderness-grade solitude to only include areas where the visitor is confined by trees and ravines. The use of a rating system for opportuni-

ties for solitude as the main basis to drop wilderness lands violates the Wilderness Study Policy.

These benchlands present a critical component of the West Desert ecology. Critical wildlife habitat and a diverse vegetation mix are unrepresented in BLM wilderness recommendations.

**4.2 RESPONSE:** The initial inventory maps, photographs, narratives, technical reports, and SSA prepared for the WSA detail the intrusions (see General Comment Response 3.1, which discusses BLM's wilderness inventory). BLM's conclusions regarding the importance of intrusions is explained in the Description of the Affected Environment, Naturalness section, where it states that intrusions are substantially unnoticeable in the area as a whole, and the entire WSA meets the Wilderness Act criteria for naturalness. Therefore, a map is not needed.

The assessment of outstanding solitude was based on the criteria outlined in the Wilderness Study Policy. Suitability reflects a judgment considering a wide range of factors, including solitude. Several cumulative factors formed the basis for excluding the benchlands from the Partial Wilderness Alternative. In most cases, WSAs and/or Partial Wilderness Alternatives represent only a small portion of the total environment of an area. An area's suitability for wilderness must be evaluated, based on the mandatory wilderness characteristics and special values. Wildlife habitat and vegetation are supplemental values that are considered in the assessment for wilderness.

Also, see Appendix 11 in Volume I, which summarizes BLM's rationale for the Proposed Action.

**4.3 COMMENT:** BLM failed to assess the wilderness values lost in the deletions from the WSA proposal. An area larger than the WSA should be designated wilderness. BLM violated the inventory process by excluding lands of important wilderness character. BLM failed to consider the importance of the caves on the National Register in the wilderness inventory. With this new information, we request that BLM correct the inventory record. [Utah Wilderness Coalition]

**4.3 RESPONSE:** The impacts to wilderness values on deleted areas (Partial Wilderness Alternative) are outlined on pages 27 and 28 of the Fish Springs analysis in the Draft EIS and are also analyzed in the Final EIS. The size of WSAs can only be increased in special

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 4: FISH SPRINGS WSA (CONTINUED)

circumstances (i.e., to add acreage for management purposes or by a land exchange). No lands were excluded in the inventory that met the criteria, as outlined in the BLM Wilderness Inventory Handbook and/or Wilderness Study Policy. Also, see the response to General Comment 3.1.

The caves on the National Register are outside the WSA, as noted on Page 15 of the Fish Springs analysis in the Draft EIS. This information is correct.

**4.4 COMMENT:** The Wilderness Coalition's proposal should be BLM's Proposed Action. [Sierra Club, Cache Group, Utah Wilderness Association, et al.]

a. BLM has made a very positive recommendation in supporting wilderness on the Fish Springs Mountains, and we support that effort. However, we are puzzled with the rationale (and the boundary) for the Partial Wilderness Alternative selected by BLM. The stated objective for the Partial Wilderness Alternative is to exclude the areas most used by livestock. Since there is not a conflict between wilderness designation and livestock grazing (indeed, the Draft EIS states the All Wilderness Alternative would have "little effect on grazing management"), we feel a better boundary is one which strives to protect the deserving wilderness lands, as well as being more manageable on the ground.

With this in mind, the Utah Wilderness Coalition has developed a modified Partial Wilderness Alternative of 45,000 acres (see map). This boundary excludes all of the ORV impacts and will not negatively affect current grazing use and management. It includes some of the rugged benchlands--not represented in other West Desert wildernesses--along the southern one-third of the unit. These benchlands are unimpacted and not represented in BLM's proposal. It is also a much more definable on-the-ground boundary since it follows topographic features, not legal lines. Protection of these border areas will accent the isolation of the core of the range, which will be very important to desert bighorn sheep when they are reintroduced. The close proximity of the Fish Springs National Wildlife Refuge is likely to substantially increase the popularity of the Fish Springs Mountains for hiking and other primitive recreation pursuits. The narrow width of the Fish Springs range places greater importance on maintaining the wilderness character of the boundaries and benchlands. Therefore, we strongly urge BLM to adopt the Utah Wilderness Coalition's recommendation.

b. We strongly support and suggest to BLM that the Utah Wilderness Coalition's 45,000-acre proposal be considered. Note that this proposal is entirely within the WSA's 52,580-acre size.

Wilderness designation, as proposed by the Utah Wilderness Coalition, will protect important habitat for the neighboring Fish Springs National Wildlife Refuge.

BLM has ignored critical antelope and deer habitat on the mountain benchlands of this WSA; additional critical habitat for threatened peregrine falcons and bald eagles is also missing.

The Utah Wilderness Coalition's proposal includes a unique and outstanding geological feature called "attenuation faulting" which only wilderness designation can completely protect.

c. BLM's Partial Wilderness Alternative has changed a reasonable, manageable boundary into an unmanageable boundary by following section lines. The Utah Wilderness Coalition's Partial Wilderness Alternative provides a more manageable boundary.

**4.4 RESPONSE:** Because of rugged terrain, livestock use is restricted to the benchlands in this WSA. Restrictions on developments and rights-of-way could affect livestock management. As noted on Page 27 of the Fish Springs analysis in the Draft EIS: "Wilderness protection stipulations would not be required outside the wilderness area, making construction, use, maintenance, and development less cumbersome." Also, only 2 of the 10 miles of ways within the WSA are in the recommended portion, allowing for use of most of the ways for livestock management. This alternative would be less restrictive to livestock management than the All Wilderness Alternative.

Portions of the WSA were excluded from the Partial Wilderness Alternative due to a combination of factors, including lack of outstanding wilderness values, manageability problems, etc. The configuration (boundaries) was used to provide a more legally defined, surveyable boundary.

The FWS has not expressed concern for the Partial Wilderness Alternative (Proposed Action). No critical habitat for threatened and endangered or sensitive species has been identified within the WSA. BLM is not aware of any threat to antelope and deer habitat. The West Desert HMP (USDI, BLM, 1980b) has

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 4: FISH SPRINGS WSA (CONTINUED)

been implemented to protect wildlife values in the area.

The assumption that wilderness designation is the "only" way to protect attenuation faulting is inaccurate. This type of faulting would only be discernible through detailed geologic study and is not likely to be of interest to the general public. Major surface mining and excavation would be the only threat to examples of attenuation faulting, and this is not projected for the WSA.

The Utah Wilderness Coalition's Partial Wilderness Alternative appears to follow contour lines. Of seven methods to delineate boundaries for wilderness areas, BLM's Washington Office ranks the use of contour lines as No. 6 in desirability, while the use of previously surveyed lines or legally determined lines (such as section lines) is ranked No. 3. This is because more precision is possible in locating section lines. BLM views BLM's proposed lines as more manageable than the contour lines proposed by Utah Wilderness Coalition.

The Utah Wilderness Coalition's alternative has been considered but not analyzed in detail.

**4.5 COMMENT:** The acreage on the periphery of the WSA excluded from BLM's recommendation serves as important habitat for wildlife protected by the adjoining wildlife refuge; it should be included in the final wilderness designation. [Mark Peterson]

**4.5 RESPONSE:** The benchlands, to our knowledge, do not provide important habitat for wildlife protected by the adjoining wildlife refuge. Wildlife in the area is protected by measures outlined in BLM's West Desert HMP. Protection of important wildlife habitat is supplemental rather than mandatory for wilderness designation. Also, see the response to Specific Comment 4.2.

**4.6 COMMENT:** This area, where biological values outweigh human recreation values, needs to have the entire WSA designated as a wilderness area. [Utah Wilderness Coalition]

**4.6 RESPONSE:** The Wilderness Act of 1964 specifies that recommendations for designation be made where wilderness would be the most appropriate use of the land and where the mandatory criteria for wilderness values are met. Recommendations will be based on these criteria. Wilderness designation is de-

signed to protect wilderness values. If other resource values are at risk, then other processes can be used to protect them (e.g., ACEC designation). Also, see the response to Specific Comment 4.2.

**4.7 COMMENT:** It is fairly confusing why low elevation, livestock use, or not being the "most outstanding" portion of the wilderness should be a reasonable argument for not including the alluvial fans and foothills around the perimeter of the Fish Spring Mountains in BLM's Proposed Action. Furthermore, it seems unusual that boundaries should follow such straight lines as in BLM's Partial Wilderness Alternative. I feel that the All Wilderness Alternative is appropriate for several reasons: it protects the "total landform" of the Fish Springs range; it adds protective solitude by preventing the intrusions of roads and other developments nearer to the core of the wilderness; and, frankly, I and a lot of other people like and enjoy large expanses of undisturbed bajadas in spite of the preconceived notions of "wilderness" which BLM has often used to preclude such areas from wilderness consideration. Again, I feel that all the acreage here should be included as wilderness. [Michael Van Note]

**4.7 RESPONSE:** The acreage recommended as suitable for wilderness designation was determined by criteria outlined in the Wilderness Study Policy. To meet these criteria, the area must contain the mandatory wilderness values of solitude and primitive and unconfined recreation.

The phrase "most outstanding wilderness values" indicates that BLM believes the area possesses mandatory characteristics and special features, making it more suitable for wilderness than surrounding areas. In addition, the boundaries reflect BLM's interpretation of manageability.

Also, see the response to Specific Comment 4.4.

**4.8 COMMENT:** Page 9: In the paragraph dealing with predator control, the Draft EIS states: "In the wilderness area controls would be allowed under the same considerations . . ." I understand the point of the paragraph but, because of the wording, or rather the position of the sentences, it tends to be misleading. It would be easy to interpret the paragraph as meaning that predator control in the wilderness area would be allowed without wilderness considerations, as it would in the nonwilderness area. [George Hinde]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 4: FISH SPRINGS WSA (CONTINUED)

**4.8 RESPONSE:** The wording throughout the entire Wilderness EIS has been changed to more clearly indicate the actual predator control policy within and outside wilderness areas. Also, the response to see General Comment 3.27.

**4.9 COMMENT:** Estimates of the multiple-use benefits of wilderness designations are frustrated by the lack of completed wilderness resource inventories. Missing is critical information on rare and endangered species, wildlife, vegetation, recreation, and archaeological sites. Reports from these inventories are a required component of the planning system. Needed is quantitative analysis of the benefits wilderness protection provides. [Utah Wilderness Coalition]

**4.9 RESPONSE:** The most current resource data available were used in preparation of the Draft EIS. BLM believes that the current information is sufficient for the wilderness suitability study. A summary of significant environmental consequences (both positive and negative) for the various resources is summarized on Pages 10 and 11 of the Fish Springs analysis in the Draft EIS. The Partial and All Wilderness Alternatives analyze the benefits to the various resources provided by wilderness designation. Also, see the responses to General Comments 9.6, 13.1, 20.2, and 22.1.

**4.10 COMMENT:** Page 12, Vegetation, Paragraph 3: Although it is highly unlikely that there are endangered species in this area, it would be more correct to state that: "No threatened, endangered, or sensitive plant species are known to occur . . .," since the area has not been studied. [State of Utah]

**4.10 RESPONSE:** The statement on Page 12 states that no surveys have been conducted, and that, according to references, there are no threatened, endangered, or sensitive species in the Fish Springs Mountains WSA. Nevertheless, the sentence has been rewritten as suggested in the comment.

**4.11 COMMENT:** Page 12: The OIR of 3+ is contradictory to the information given in Table 4, in general. Please note that most of the favorability ratings are only f1/f2, and those minerals with a high favorability rating have a certainty rating of only c1/c2. An OIR of 2 is more realistic. Also, on Page 22, Locatable Minerals section, the last sentence which states that many of the minerals have a fairly high occurrence potential is false if the information given in Table 4 is correct. [George Hinde]

**4.11 RESPONSE:** Table 4 has been modified to more clearly reflect the favorability ratings. The WSA has a high geologic favorability for small- to moderate-sized deposits of some locatable minerals.

Also, see the response to General Comment 15.7 which explains that the OIR was confusing and has been eliminated in the Final EIS.

**4.12 COMMENT:** BLM indicates that the area has pre-FLPMA oil and gas leases. The mention of pre-FLPMA geothermal leases is also discussed. Since no map is provided, it is impossible to conclude if these are within either the WSA or the recommended portion of the WSA. No information on the surface management stipulations attached to these leases is given. This information is critical in assessing the presence of conflicts and management problems. [Utah Wilderness Coalition]

**4.12 RESPONSE:** The Draft EIS did explain how many acres were under lease in each alternative. The question, however, is no longer relevant, because all oil and gas leases (pre- and post-FLPMA) and all geothermal leases have expired. There are currently no mineral leases in this WSA.

A statement is also included on the acreage of the WSA in each of the leasing categories which may require standard and special stipulations, no surface occupancy, or no leasing. BLM considers this level of detail appropriate for the EIS analysis. If additional information is needed, the commentor is referred to BLM records.

**4.13 COMMENT:** BLM incorrectly states that the presence of mineral claims causes management problems in designated wilderness areas. The Wilderness Study Policy specifically addresses this argument as a violation of the Wilderness Act, the Wilderness Study Policy, and the Wilderness Management Policy. The presence of mining claims is not a valid reason in the Wilderness Study Policy to drop lands from wilderness recommendation. [Utah Wilderness Coalition]

**4.13 RESPONSE:** See the responses to General Comments 1.13 and 9.14.

**4.14 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should, therefore, be eliminated from consideration as a wilderness area. The

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 4: FISH SPRINGS WSA (CONTINUED)

following information is given for BLM's consideration. [Utah International, Inc.]

Numerous roads, jeep trails, and mining-related structures are located within or near the northern portion of the WSA. The southern half of the WSA contains only a few jeep trails into the canyons on the east side of the range.

The WSA has been a historic producer of lead, zinc, silver, copper, and gold.

Very high potential exists for future production of lead, zinc, silver, gold, and copper from sedimentary and unexposed intrusive rocks. The potential for the area is much greater than outlined in the Draft EIS.

A significant zinc-silver reserve exists at the north end in the vicinity of the Utah, Emma, and Wilson mines. Limited silver production is scheduled to begin in late 1986 or early 1987 from materials located at the Utah Mine.

The phenomenon known as attenuation or denudation faulting in the Fish Springs range is recognized as being related to buried, deeper-seated structures commonly associated with blind ore deposits such as those already known to exist in the northern portion of the range. Thus, even if mineral showings are limited in the southern portion of the range, the mineral potential is there.

**4.14 RESPONSE:** The information in the comment has been reviewed for accuracy and the pertinent data incorporated into the text of the Final EIS.

**4.15 COMMENT:** Page 10, Partial Wilderness Alternative, Paragraph 1: The summary states: "All of the existing mining claims are on the margins of the WSA and would be in the nondesignated area." This is inconsistent with other statements on Page 25 that suggest claims are present in the designated area. [State of Utah]

**4.15 RESPONSE:** There were inconsistencies between the text and Table 1 relative to the extent of mining claims in the designated and nondesignated portions of the WSA with the Partial Wilderness Alternative. Table 1 and the analysis have been revised to accurately explain the location of mining claims relative to the designated and nondesignated portions of the WSA. The number and location of claims has

changed since the Draft EIS and will continue to change in the future.

**4.16 COMMENT:** As compared to other WSAs in the region, Fish Springs Mountains WSA is considered to possess both moderate wilderness values and conflicts. Most conflicts are reduced by the recommended 33,840-acre Partial Wilderness Alternative, except for potential mineral values. The impact of a Partial Wilderness Alternative on existing mining claims and the existence of potential mineral resources within the area need to be analyzed further. [State of Utah]

**4.16 RESPONSE:** See the response to Specific Comment 4.15.

**4.17 COMMENT:** Page 77, Big Game Species, Paragraph 5: UDWR has also identified Fish Springs Mountains WSA as a proposed desert bighorn sheep transplant site. [State of Utah]

**4.17 RESPONSE:** The following wording appears in Volume I of the Final EIS: "Transplants of Rocky Mountain bighorn sheep and Rocky Mountain elk have been proposed for North Stansbury Mountains WSA. Transplants of desert bighorn sheep have been proposed for the Fish Springs Mountains WSA." In January 1984, UDWR reintroduced Rocky Mountain bighorn sheep into its historical range within the Deep Creek Mountains WSA located approximately 80 miles to the southwest. The herd consists of 22 sheep."

A discussion of the proposed transplant is also included in the analysis of the Fish Springs Mountains WSA, Wildlife sections.

**4.18 COMMENT:** Page 8, Paragraph 4: The desert bighorn sheep transplant proposed by UDWR will require water guzzlers since there is no water present in the area. No specific water guzzler sites have been identified at this time. [State of Utah]

Page 221, Volume I, Fish and Wildlife: Reintroduction of desert bighorn sheep to the Fish Springs Mountains WSA as proposed will require construction of water guzzlers. Otherwise, a transplant will not be viable.

**4.18 RESPONSE:** The Fish Springs Mountains WSA will be included in a BLM Richfield District Office Bighorn Sheep Plan which will identify this area as a potential transplant site. This plan is currently being

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 4: FISH SPRINGS WSA (CONTINUED)

drafted. Water guzzler sites in the WSA will be identified in cooperation with UDWR. The construction of water guzzler sites will be in conformance with wilderness protection standards (see Appendix 1 in Volume I). In the Final EIS/RMP for the House Range Resource Area (USDI, BLM, 1986), the Fish Springs range was identified as a potential transplant site for desert bighorn sheep.

It is projected that approximately three guzzlers would be required in the WSA for bighorn sheep use. A discussion of the guzzlers and their general locations has been included in the Final EIS. Also, see the response to Specific Comment 4.17.

**4.19 COMMENT:** This mountain range forms the backbone of a unique biotic community. The presence of a large wetlands area in Fish Springs National Wildlife Refuge, coupled with this mountain range and its benchlands, support a large and diverse community. [Utah Wilderness Coalition]

This area, as described by the Draft EIS, also possesses outstanding opportunities for solitude and wilderness activities. While high in quality, hunting is not one of the activities BLM lists.

**4.19 RESPONSE:** As noted on Page 15 of the Fish Springs analysis of the Draft EIS, "Limiting factors for recreation opportunities include lack of water, rugged terrain, and limited wildlife." Hunting was one of 15 recreation opportunities evaluated, but was found to be of low quality due to limited game animal populations within the WSA.

The Final EIS analyzes the factors mentioned in the comment.

**4.20 COMMENT:** The nearby Fish Springs National Wildlife Refuge attracts important populations of breeding and migratory birds. It is important that critical breeding habitat for the associated dependent predatory bird populations be set aside, particularly in view of current efforts to reestablish the endangered peregrine falcon and to preserve winter resting areas for the bald eagle in the Great Basin. There is also a need to protect golden eagle breeding sites. [Carleton DeTar, et al.]

**4.20 RESPONSE:** Peregrine falcons have been identified within Fish Springs National Wildlife Refuge, but there is no officially designated bald eagle or peregrine falcon critical habitat within Utah as defined by

the Endangered Species Act (Final RMP/EIS House Range Resource Area, USDI, BLM, 1986). The FWS identifies critical habitat for protected or endangered species for BLM under a Section 7 consultation. This consultation was completed for the Fish Springs range as part of the planning process prior to writing the Wilderness Draft EIS. At that time it was determined that the Fish Springs range did not qualify as critical habitat.

**4.21 COMMENT:** We run sheep along the side of the Deep Creek Mountains and come down over the side of the canyon and have permits on the west side of the Dugway Mountains and along Fish Springs. With the Army on one side of us protecting--they don't protect them. They try to get them. But at least you are not allowed control in there. And the air base is there. And then you have all these wilderness areas on the other side. Without adequate predator control, we would be out of business there. [Utah Wool Growers]

**4.21 RESPONSE:** See the response to Specific Comment 3.31.

**4.22 COMMENT:** The Fish Springs WSA, Rockwell WSA, and Swasey Mountain WSA have only Class A and Class C scenic quality classifications. I find it hard to believe that no Class B scenic quality areas exist in these WSAs. [Owen Severance]

**4.22 RESPONSE:** In 1980, Meiji Resource Consultants were contracted by BLM to conduct a visual resource inventory and analysis of the West-Central Utah Regional Area. The inventory included the Fish Springs, Rockwell, and Swasey Mountain WSAs. As part of the House Range Resource Area RMP, an evaluation of the Meiji Resources inventory was completed by BLM. Portions of these areas were felt to have moderate visual qualities warranting a scenic quality classification of B scenery. Changes were made, as reflected in the House Range Final RMP/EIS. The data were not completed at the time the Statewide Wilderness Draft EIS was prepared. However, this update is included in the Final EIS.

The changes made resulted from the review team's evaluation of scenic resources, which changed some of the ratings from Class A to Class B.

**4.23 COMMENT:** BLM fails to identify which specific areas are rated outstanding and which are rated most outstanding. A map is needed. BLM also fails to identify the areas with manageability difficulties.



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 4: FISH SPRINGS WSA (CONTINUED)

None of the management issues used as conflicts with wilderness by the Wilderness Study Policy are found in this area. BLM has no management conflicts which are consistent with the Study Policy identified for this area. We request that BLM provide a detailed description of these problems, the Wilderness Study Policy supporting BLM's conclusion, a description of the scale of the conflict, its effect on wilderness, and a map of their location. [Utah Wilderness Coalition]

**4.23 RESPONSE:** See the responses to General Comments 8.6 and 9.14, which address identification of manageability conflicts; 8.11 and 22.5, which address ranking of wilderness values; and 2.13 and 26.1, which discuss mapping of resources and conflicts.

**4.24 COMMENT:** Page 9, Geology: This section should include mention of rock units, ages, etc. [State of Utah]

**4.24 RESPONSE:** The bedrock exposed in the WSA is of Cambrian, Ordovician, Silurian, and Devonian ages. This information has been included in the Final EIS.

**4.25 COMMENT:** Page 13, Locatable Minerals: This section does not state that mines exist less than 0.50 mile from the WSA boundary and that workings from this mine might trend under the WSA. Also, disseminated gold potential in carbonates is not discussed. [State of Utah]

**4.25 RESPONSE:** The presence of lead and zinc mines on the north end of the Fish Springs range is noted in the Final EIS. The potential for gold is also discussed.

## SECTION 5 ROCKWELL WSA

**5.1 COMMENT:** There are problems with manageability of the area as wilderness due to the Little Sahara Recreation Area. In lieu of wilderness, the State supports designation of the Rockwell Natural Area as an ACEC. This recommendation was included in the State's comments on the House Range Draft Resource Management Plan and EIS. [State of Utah]

**5.1 RESPONSE:** The BLM Proposed Action for the Rockwell WSA is to continue to manage the area, as

part of the Rockwell Natural Area. The recently completed House Range RMP/EIS has designated the Rockwell Natural Area as an Outstanding Natural Area (ONA) Area of Critical Environmental Concern (ACEC).

The Affected Environment Land Use Plans section of the EIS reports the State of Utah position on the Rockwell WSA.

**5.2 COMMENT:** I support BLM's No Action proposal if the area will continue to be managed as the Rockwell Natural Area. [Owen Severance]

**5.2 RESPONSE:** See the response to Specific Comment 5.1.

**5.3 COMMENT:** Open sand dunes are little represented in our National Wilderness System. If this area is so important to manage it as a natural area, then it seems that the further protection given by wilderness designation is only logical. If nearly five times as much land can be ruthlessly mismanaged for ORV recreation, then it would not seem to much to ask that the remaining portion be managed for those who prefer the solitude and pristine undisturbed dunes. Wilderness designation for all of this WSA seems to be the best way to accomplish this. [Michael Van Note]

**5.3 RESPONSE:** The Rockwell Natural Area and subsequent ORV closure were implemented to provide an area for those who prefer a more secluded recreational experience, and to protect the natural values of the area.

The House Range Resource Area Resource Management Plan, recently approved and designated the Rockwell Natural Area as an ACEC, and subsequent minerals withdrawal will further ensure opportunities to experience undisturbed dunes. However, because of nearby noises from ORV activities, solitude cannot be ensured. As high as 80,000 people use the Little Sahara area annually for ORV use, and the whine of engines can be heard in the WSA. See Appendix 11 for a summary of the rationale for BLM Proposed Action.

**5.4 COMMENT:** We disagree with BLM that the nearby Little Sahara ORV area will disrupt wilderness qualities of the Rockwell WSA. Wilderness can be designated here and the associated qualities of solitude,

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 5: ROCKWELL WSA (CONTINUED)

naturalness, and primitive outdoor recreation can be expected. [Sierra Club, Cache Group]

Wilderness designation is important here to protect a unique Utah topography.

**5.4 RESPONSE:** Topographically the WSA is typified by gently rolling hills.

Vegetation consists of scattered juniper and low desert shrubs. Because both prominent topography and vegetative screening are generally lacking on 46 percent of the area, opportunities for avoiding the sights and sounds of adjacent high intensity ORV uses are low. Periods of high intensity use at Little Sahara would have adverse effects on opportunities for finding solitude in this portion of the WSA.

Wilderness designation is for the purpose of protecting wilderness values. An area larger than the WSA is already designated a natural area and ORVs are prohibited. This natural area is being recommended for designation as an ACEC. See the response to Specific Comment 5.3.

**5.5 COMMENT:** I understand that the Bureau has recommended the Rockwell Natural Area as nonwilderness. Ostensibly, this is because of its proximity to the Little Sahara ORV area. [Mark Peterson]

I would suggest that experience gained by the BLM California Desert District in a similar situation applies to Rockwell. The Imperial Dunes, located in the El Centro Resource Area, are divided into four regions on the basis of current use: 1. Mammoth Wash (ORV open area), 2. North Algodones Dunes (WSA, no ORV use), 3. Glamis area (ORV open area), and 4. South Algodones Dunes (WSA, no ORV use). One might expect this division to lead to an unmanageable situation with respect to ORV use within the nearby WSAs. To the contrary, both WSAs remain in very good condition in terms of undisturbed natural character. This is a direct result of the commitment of the local BLM office to manage all areas strictly per their designations.

Despite the good results BLM has achieved at the Imperial Dunes, there are still isolated instances of ORV activity in the WSAs. I spoke with one of the patrolling rangers about this problem, and he expressed the feeling that even these intrusions might be eliminated if it was obvious to ORV users that the closed areas were "cared about." What better way to demon-

strate widespread public concern for a natural area than to designate it as wilderness?

**5.5 RESPONSE:** The Rockwell WSA was not recommended for wilderness based on wilderness values. For example, proximity to a heavily used ORV area creates adverse impacts on wilderness values such as solitude.

The Resource Management Plan, recently completed for the House Range Resource Area, designated the Rockwell Natural Area as an ACEC to demonstrate the public concern for the natural area and provide further emphasis for the need to preserve the area. See the response to Specific Comment 5.3.

**5.6 COMMENT:** The Draft EIS states, "WSAs contain about 2 percent of the State total of ORV trails . . . the total miles of ORV routes within WSAs would remain relatively small when compared to the total miles within southern Utah and the State as a whole" (Volume I, page 185). Yet, the Draft EIS several times, especially in Devils Canyon and Rockwell WSAs, uses ORV use to justify a nonwilderness recommendation. Since wilderness designation will not adversely affect ORV recreationists, BLM should discount any ORV use concerns and actively pursue enforcement of regulations that keep ORVs out of wilderness areas. [Sierra Club, Cache Group]

**5.6 RESPONSE:** The quoted section noted from page 185 of Volume I is in reference to "the potential impact of wilderness designation upon current and potential opportunities for motorized recreation." ORV use on free-moving dunes is not reflected in an analysis of trails used by ORVs. The Rockwell area is presently closed to ORV use.

The Little Sahara Recreation Area comprises the most heavily used (396,000 visitor days annually) public lands in the State of Utah. As noted on page 11 of the Draft EIS, "Recreationists participate in a wide variety of activities during their visits to Little Sahara Recreation Area, but some form of motorized recreation is the primary focus for a majority of the users." ORV use near the WSA is a definite factor in evaluating the suitability of this area for wilderness. Also see the response to Specific Comment 5.3.

**5.7 COMMENT:** Rockwell WSA - Page 6, Geology: This is more of a topographic, geomorphic description than a geologic description. What geologic units might be expected to subcrop below the dunes? What

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 5: ROCKWELL WSA (CONTINUED)

economic potential would be expected from these units? [State of Utah]

**5.7 RESPONSE:** See the responses to General Comments 11.1 and 11.2. Additional information has been added to the Geology-Topography sections of the Final EIS.

**5.8 COMMENT:** By trade I am a consulting geologist. I have studied a few of the study areas in this report, the Rockwell, Howell Peak, and Swasey Peak WSAs. [Robert Steel]

I have found that the geology that was done for the areas was very vague and inconclusive. It was bad.

**5.8 RESPONSE:** See the response to Specific Comment 5.7.

**5.9 COMMENT:** This variety of saltbush (Atriplex canescens var. gigantea) requires shifting sand dunes and the absence of animal grazing for survival. The Rockwell-Little Sahara area is the only area supporting this particular species. The Rockwell area's free moving sand dunes are unique in Utah. [Utah Wilderness Coalition]

**5.9 RESPONSE:** Protection of Atriplex canescens var. gigantea is one of the reasons the area has been designated a "Natural Area" and is now an ONA/ACEC.

BLM's Proposed No Action/No Wilderness Alternative is based on the affect of outside sights and sounds on opportunities for solitude which is a required wilderness characteristic. See Appendix 11 in Volume I.

**5.10 COMMENT:** Endangered species existing in the Rockwell WSA cannot be fully and properly protected without wilderness designation. [Brett Jensen]

**5.10 RESPONSE:** See the responses to General Comments 13.1 and 13.5. According to the best information available, there are no threatened or endangered plant species in the Rockwell WSA.

The unusual giant diploid form of the fourwing saltbush is a Category 2 candidate species. Under BLM policy, this species is managed as if it were officially listed as threatened or endangered. It is also protected by the current natural area designa-

tion. In the absence of wilderness designation this area will be managed as an ONA/ACEC. Also see the response to Specific Comment 5.3.

**5.11 COMMENT:** Page 8, Vegetation: It would be more correct to say, "According to Welsh (1979) and herbarium records, there are no threatened, endangered, or sensitive plant species known to occur within the Rockwell WSA." [State of Utah]

**5.11 RESPONSE:** The Final EIS has been changed to read as suggested in the comment.

**5.12 COMMENT:** According to Science Application, Inc., 1982, mineral potential in the Rockwell WSA is ranked as low. This statement is untrue and very misleading. As a matter of fact, the mineral potential is very high. Copper, lead, silver, and gold mineralization outcrops in varying amounts well within the center of the WSA have been discovered. On the south end of the WSA, many outcrops of lead, silver, copper, and gold occur and the potential could extend throughout the entire WSA. [Robert Steel and Gerald J. Dalton]

The WSA states the cost associated with deep exploration in these areas seem to outweigh the importance of the WSA as a potential target area for industry exploration in the future; also the WSA states that this is a very small area.

The WSA contains 9,150 acres or about the same size as the whole Tintic Mining District.

**5.12 RESPONSE:** The text of the Final EIS reflects a ge-ological favorability for large deposits of lead and zinc with a low degree of certainty. Changes were also made to include a favorability for small deposits of gold and silver. Also see the responses to General Comments 15.1, 15.7, 15.11, 15.17, and 15.54.

**5.13 COMMENT:** In Volume I, page 70, Table 30, "WSAs with medium to high energy and/or mineral potential" I question the inclusion of Rockwell, with an OIR rating of 1 and f4/c1 for lead/zinc, the lowest certainty the resource exists. As BLM reviews more information, it may need to change others. [Sandra Long]

**5.13 RESPONSE:** See the response to General Comment 15.7.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 5: ROCKWELL WSA (CONTINUED)

**5.14 COMMENT:** The same type of gold and silver deposits that have been found in Nevada are likely to be found in these WSAs and that was not mentioned in the EIS. [Robert Steel]

**5.14 RESPONSE:** See the response to Specific Comment 5.12.

**5.15 COMMENT:** The Fish Springs WSA, Rockwell WSA, and Swasey Mountain WSA have only Class A and Class C scenic quality classifications. I find it hard to believe that no Class B scenic quality areas exist in these WSAs. [Owen Severance]

**5.15 RESPONSE:** See the response to Specific Comment 4.22.

**5.16 COMMENT:** The Rockwell WSA is the only candidate wilderness area of its kind. The impressive views of desert mountains in all directions, the free-moving sand dunes, and the associated wildlife and vegetation, provide outstanding opportunities for various types of unconfined recreation and solitude. [Utah Wilderness Coalition]

**5.16 RESPONSE:** Diversity and opportunities for solitude and primitive unconfined recreation are outlined in detail in the Recreation and Wilderness Values sections of the Final EIS.

**5.17 COMMENT:** The Draft EIS correctly notes (page 12) that, "The only intrusion within the WSA is a vehicular way of approximately 1 mile which penetrates from the north." The way is noticeable only when one actually comes upon it; it is not visible from a distance. [Utah Wilderness Coalition]

**5.17 RESPONSE:** The vehicular way was included as part of the Rockwell WSA because, as noted on page 12 of the Rockwell portion of the Draft EIS, it "is substantially unnoticeable." It is true that the road is not visible from a distance.

**5.18 COMMENT:** One final word in defense of the Rockwell WSA. I have spent numerous days in this area doing research on eolian processes. A type of wildland exists here, which is unique to the State; an opportunity to observe and study physical and biological reaction to encroaching sand. This in itself should provide impetus to preserve a small part of the Little Sahara complex. Many eolian dunefields are presently available to ORVs and this portion of Little Sahara can admittedly be managed for other-than-mechanized

users. Consider the saltbush, the scurfpea, the aging weather beaten juniper when tossing this unit back into the sand-play pile of BLM endorsable wildlands. [Bruce Chesler]

**5.18 RESPONSE:** As noted on page 11 of the Rockwell portion of the Draft EIS, under Recreation, "The Rockwell WSA coincides with the boundaries of the Rockwell Natural Area (minus 480 acres) comprising 17 percent of the 60,000 acres of the Little Sahara Recreation Area." The northwestern portion of Little Sahara has been left natural as the Rockwell Natural Area. Although smaller than the ORV area, the Rockwell Natural Area contains the same terrain types, including sand dunes, juniper covered hills, and sagebrush flats. However, no vehicles are allowed. Animal and plant species are protected. The recently completed Resource Management Plan for the House Range Resource Area has designated the Rockwell Natural Area as an ACEC. The ORV closure presently in effect will continue to protect natural resource values. Also see the response to Specific Comment 5.3. The features noted in the comment are presented and discussed in the EIS.

## SECTION 6

### SWASEY MOUNTAIN WSA

**6.1 COMMENT:** As a whole, the benchlands are equally important for the wildlife and plant communities. The areas being deleted are components of a complex system. To only protect part of the wilderness area will eventually jeopardize the designated part from the policy and regulation point of view. This kind of recommendation is inconsistent with wilderness study. All the designated land does not need to meet BLM's screening test to qualify. In the inventory of this area, BLM reduced the original unit from 83,320 acres to 49,500 acres. By exaggerating the significance of gully plugs and scattered old mining activities, BLM dropped almost half of this unit. Lost was the habitat favored by antelope, the prairie falcon, and the golden eagle which feed solely in the open spaces. The present wilderness recommendation is but a fraction of a larger natural area. [Utah Wilderness Coalition]

**6.1 RESPONSE:** BLM has reevaluated information submitted during the comment period and has modified the Proposed Action to eliminate mineral conflicts in the northern end of the WSA, while adding an area on

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 6: SWASEY MOUNTAIN WSA (CONTINUED)**

the southern end. See Appendix 11 for a summary of rationale for BLM'S Proposed Action.

Comments on the Utah BLM wilderness inventory are responded to in General Comment Response 3.1.

**6.2 COMMENT:** "There would be some minor positive benefits through preservation and protection of other resources (i.e., visual, cultural, recreation, wildlife)." BLM here, as with other areas, understates the importance of wilderness designation by underestimating the multiple-use benefits gained by this designation. Sensitive species and special features require that protection be the dominant policy. Nonwilderness designation would rapidly erode these values. BLM needs to follow the planning policy and inventory wilderness values. From a complete inventory, a better estimate, in quantities, not generalities, can be made of multiple-use benefits of wilderness designations. [Utah Wilderness Coalition]

**6.2 RESPONSE:** The quoted statement was a general statement in the SSA prepared for the Swasey Mountain WSA in 1984. Specific positive benefits to other resources (i.e., visual, cultural, recreation, wildlife, etc.), resulting from wilderness designation, are outlined under those various headings in the EIS. There are many laws and ways of protecting sensitive species and special features in addition to wilderness designation (i.e., ACECs, withdrawals, special designations, etc.). BLM believes the data in the EIS adequately evaluates multiple-use benefits of wilderness designation. Also, see the responses to General Comments 9.6, 13.1, 13.8, 16.4, 20.2, and 22.1 which discuss the need for inventories of wilderness values and other resources.

**6.3 COMMENT:** BLM's Proposed Action leaves out 10,000 acres of mountainous terrain in the southeastern part of the WSA that meets the requirements for solitude and primitive recreation. Also, the southwest boundary should follow the WSA boundary in Dome Canyon. The Utah Wilderness Association's proposal meets BLM's objectives without unnecessarily eliminating acreage from the wilderness proposal. [Owen Severance]

**6.3 RESPONSE:** BLM's Proposed Action has been changed in the Final EIS. See the response to Specific Comment 6.1. The area adjacent to the road in the vicinity of Dome Canyon lacks outstanding wilderness values.

**6.4 COMMENT:** A large section of the deleted lands is in the southeastern portion of the WSA. This portion is very rugged. The travel routes next to this portion of the WSA are not well traveled. The main traffic across the Tule Valley uses the Marjum Pass route (instead of Death Canyon) or the Painter Springs route. This portion of the unit is not significantly impacted by human activities. The use of activity along the boundary as a reason to delete areas is using buffer areas and is clearly a conflict with the Wilderness Study Policy. [Utah Wilderness Coalition]

**6.4 RESPONSE:** See the responses to Specific Comments 6.1 and 6.3.

**6.5 COMMENT:** BLM seems somewhat confused about the boundary it has drawn. The Draft EIS states 17,325 acres do not meet the outstanding opportunities criteria "due to relative flatness and sparse vegetation" (pages 16 and 17). On Page 30 it states the 15,000 acres found not suitable lack outstanding opportunities. Obviously, these two acreages, 17,325 and 15,000, are referring to basically the same area. Yet the 10,000 acres of mountainous terrain excluded from BLM's suitability recommendation cannot be construed as the, "17,325 acres in the benchlands" that are relatively flat and lack outstanding opportunities. Indeed, this 10,000-acre block of mountainous terrain does provide outstanding opportunities for solitude and primitive recreation and should be added to BLM's suitability recommendation. In addition, the southwest boundary should follow the WSA boundary in Dome Canyon, and BLM should acquire State Sections 32 and 36, Township 16 South, Range 13 West (Sinbad Canyon and north of Wheeler Amphitheater) and add these sections to the wilderness proposal. This will greatly improve the southern boundary configuration and management of the area. We agree some of the lands along the east and west boundaries do not qualify for wilderness. Our proposal meets BLM's stated objective for the Partial Wilderness Alternative, which is to include the area with the most outstanding wilderness characteristics. It also meets BLM's stated objective for Alternative 1 (Proposed Action), which is to determine areas suitable if there are no significant conflicts with other resources. There are no identified conflicts on the additional 11,500 acres proposed by the Utah Wilderness Association. [Utah Wilderness Association]

**6.5 RESPONSE:** The Partial Wilderness Alternative analyzed in the Final EIS includes an additional 5,928 acres in the southern end of the WSA. The acreage be-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 6: SWASEY MOUNTAIN WSA (CONTINUED)**

tween the roadway and the steep escarpment in Dome Canyon lacks mandatory wilderness characteristics and remains excluded from BLM's proposed Partial Wilderness Alternative. The 46,000-acre alternative proposed by the Utah Wilderness Association includes several State-owned sections and some BLM lands found negligible for study during the inventory phase of the wilderness review. The WSA boundaries will not be changed during the study phase. The EIS considers public lands rather than State or private. Also, see the response to General Comment 3.1.

The State of Utah's policy on exchange of State lands in wilderness areas has changed since publication of the Draft EIS. See the responses to General Comments 6.3 and 6.5.

**6.6 COMMENT:** We would prefer the Swasey Mountain WSA boundary be slightly changed by acquiring State Section 32, Township 16 South, Range 13 West, and closing the last mile of the Sinbad overlook, which is rapidly becoming a trash heap. The new boundary would be drawn from the southeast corner of Section 32 to the major road bend on the flat west of Stove Spring. [Dale Green]

**6.6 RESPONSE:** WSA boundaries were established during the inventory phase of the wilderness review. See the response to General Comment 3.1.

Section 32 is a State-of-Utah section. The State of Utah's policy for exchange of State lands in wilderness areas has changed since publication of the Draft EIS. The current position of the State is to exchange lands only when in the best interest of the citizens of Utah. See the responses to General Comments 6.3 and 6.5, which discuss the State of Utah's policy on land exchanges within wilderness areas.

The chaining and roads in the Sinbad Overlook area were excluded from the WSA during the inventory phase.

**6.7 COMMENT:** We support BLM's Partial Wilderness Alternative with inclusion of sections in the west side for habitat diversity. We also recommend establishment of a trailhead and parking area at Antelope Springs to minimize vehicular damage. [Wasatch Mountain Club]

**6.7 RESPONSE:** The sections on the west side eliminated from the Partial Wilderness Alternative lack mandatory wilderness values. Habitat diversity is not

a sufficient reason to include this portion in the Partial Wilderness Alternative. The recommendation for a trailhead parking will be considered in the Wilderness Management Plan prepared for the area if it is designated wilderness by Congress.

See Appendix 11 in Volume I for a summary of rationale for BLM's Proposed Action.

**6.8 COMMENT:** By designating the large area as wilderness, Swasey Mountain will complement potential wilderness designation with Howell Peak and Notch Peak. These three areas could easily be considered the House Range Wilderness Complex for a better and larger management plan. [Sierra Club, Cache Group]

**6.8 RESPONSE:** Wilderness designation of Swasey Mountain will be based on wilderness characteristics and other values outlined in the Wilderness Study Policy. Designation of other areas, such as Howell Peak and/or Notch Peak, will be based on the same criteria. These three WSAs do not meet the criteria for analysis under the Cluster Alternatives, analyzed in Volume I of the Draft EIS. Each WSA is, therefore, analyzed as a separate unit.

Also, see the response to General Comment 3.28 that addresses the concept of a House Range Complex.

**6.9 COMMENT:** Deletions of the northern part of the unit are to remove what BLM claims are management problems with mineral resource conflicts. The extreme north end of the WSA was already eliminated in the inventory, partly to remove future development conflicts. There is some mineral activity and there is also a prairie falcon nesting site in the northern part of this WSA. The EIS states: "The favorability for uranium occurrence in the WSA is rated high." This differs significantly with the mineral-resource evaluation of WSAs (1982) which gives this area a rating of f1 for uranium. The report states: "Many of the base and precious-metal deposits in western Utah (including uranium) are aligned along two west-trending belts that are characterized by igneous intrusion rocks of Tertiary age (Butler et al., 1920; Hilpert and Roberts, 1964; Stewart et al., 1977)." The report continues: "The inferred past and/or current geologic processes operating in the area are believed to preclude the accumulation of the resource. At present, there are no known commercially producible deposits of gold, silver, copper, lead, or zinc." Thus, this deletion does not resolve a conflict. Deletion of lands solely on the presence of mining claims also

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 6: SWASEY MOUNTAIN WSA (CONTINUED)**

violates the Wilderness Study Policy. BLM fails to describe the exact location of future geothermal and mineral resources on a map. It isn't possible to determine the correlation of the boundary with these conflicts without this information. [Utah Wilderness Coalition]

**6.9 RESPONSE:** See the responses to Specific Comments 6.20, 6.21, 6.22, and 6.23 in Volume VII-C and Appendix 11 in Volume I.

**6.10 COMMENT:** I feel that the uniqueness and fragility of caves in general are also underestimated by BLM in its treatment of the Swasey Mountain WSA. For example, over 75 percent of the caves I have visited have deposits of archaeological/paleontological interest. Even relatively educated cavers in organized groups are unable to recognize all of the values within a cave. Often, as a result, bones, torches, split-twig figurines, unusual deposits, mineral formations, and various troglodytic fauna are trampled by well-meaning people. As a result many individuals have taken it upon themselves to protect caves by simply not mentioning them to anyone but a few close and trusted comrades or scientists. I suspect that the number of caves actually known in this and adjacent WSAs is far greater than what BLM is aware of. The whole point of this is to stress the unique museum/laboratory/recreational experience that caves represent which must be given maximum consideration in any management decision. A larger wilderness will protect these resources by providing a greater security in the form of limited access, limited discovery of, and, hence, limited abuse of those resources, not to mention possible damage from mineral exploration/recovery. As caves are natural animal traps, hibernaculums, and shelters for man, I would suspect that every cave within BLM WSAs has items of paleontological and archaeological importance. Solitude is perfect in caves. [Michael Van Note]

**6.10 RESPONSE:** The Geology, Recreation, and Wilderness Values sections of the EIS recognize the value of the four known caves in the WSA. In addition, the EIS states that more caves will undoubtedly be found as the area is more thoroughly explored. The caves are considered special features, secondary to the mandatory wilderness characteristics.

See Appendix 11 in Volume I for a summary of rationale for the BLM Proposed Action.

**6.11 COMMENT:** Dropping large natural areas because they don't meet one wilderness criterion is a violation of the Wilderness Study Policy. Dropping large natural areas, in this case, the benchlands, because of a BLM assessment that solitude isn't present is not the correct use of the Wilderness Study Policy. BLM exaggerates the situation by calling these areas flat, when they actually have an elevation drop of approximately 800 feet in the western portions recommended to be deleted. In the southeastern portion of the unit numerous dry washes break the terrain, providing significant topographic screening. Both BLM's description of the area and their use of the policy are wrong in making these deletions. The western side of the WSA being dropped has important scientific values. BLM is in error in concluding a sparseness of vegetation (no criteria given) on the western side of the House Range where the *Tetradymia*-shadscale faciation of the shadscale ecosystem occurs. This abundance of vegetation occurs in contrast to the saline flats of Tule Valley and the rock outcroppings of the House Range. [Utah Wilderness Coalition]

**6.11 RESPONSE:** No areas were dropped because they did not meet just one wilderness criteria. The Wilderness Study Policy outlines the procedure for determining solitude. The benchlands did not meet the criteria for solitude or primitive recreation. The Draft EIS narrative regarding solitude provides some examples of areas not meeting the criteria, but was not meant to be all inclusive. The dry washes do provide some topographic screening, but the peripheral roads and the accompanying activity can be seen from the washes. The western side was dropped due to lack of outstanding solitude and primitive recreation values. In the Wilderness Study Policy, one of the determining factors to determine outstanding solitude is the presence or lack of screening (vegetative or topographic). The shadscale vegetation is not dense nor tall enough to provide visual screening. Also, see the response to Specific Comment 6.3.

**6.12 COMMENT:** Swasey Mountain WSA ranks moderate to high in both wilderness values and significance of conflicts within the region. Special features in this WSA, including trilobite beds, historical values, limestone caves and wild horses, contribute to its outstanding wilderness values. Potential for disseminated gold and porphyry molybdenum may also be significant. Further geological investigations would be necessary to resolve this potential conflict. A boundary adjustment to delete the north quarter of the WSA

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 6: SWASEY MOUNTAIN WSA (CONTINUED)**

would help to reduce any livestock conflicts. [State of Utah]

**6.12 RESPONSE:** BLM, in consultation with the U.S. Department of Energy, had each WSA independently assessed for its energy and mineral resources by the SAI. If an area is recommended as wilderness, the USGS and USBM will prepare additional mineral evaluations. These studies should help the President and Congress resolve potential conflicts. No conflicts with livestock are known to occur on the northern end of the WSA.

**6.13 COMMENT:** The entire WSA provides significant habitat for antelope and endangered peregrine falcon. Many critical wildlife habitats on the benches and on the southeast part of Swasey Mountain itself were deleted in the Draft EIS. No significant development conflicts were identified in the Draft EIS for this WSA. Why then the deletions? [Sierra Club, Cache Group]

**6.13 RESPONSE:** Antelope utilize the lower slopes of the WSA, as well as the adjoining valleys and hills. Peregrine falcons are generally found at the higher elevations of the WSA. No critical wildlife habitat has been identified within the Swasey Mountain WSA. Potential developments are outlined in the minerals sections throughout the Swasey Mountain analysis (Volume II of the Draft EIS) and are summarized in Volume I. Areas were also deleted in the Partial Wilderness Alternative due to lack of outstanding wilderness values (see Appendix 11 in Volume I).

**6.14 COMMENT:** The core area recommended as wilderness by BLM is of indisputable significance, given well-known concentrations of fossil-bearing formations, as well as the presence of significant underground caverns. Yet, important buffer zones to the west and southeast, while included in the WSA, are not included in the recommendation. The entire WSA should be designated wilderness. [Mark Peterson]

**6.14 RESPONSE:** See the responses to Specific Comments 6.1 and 6.3.

**6.15 COMMENT:** Again, I see no reason why the flats should not be included to give added protection to antelope habitat and to increase/protect solitude in the core wilderness area. I suggest that all of the WSA be made wilderness except, perhaps, the portion in the southeast corner of the WSA eliminated by BLM

in the proposed Partial Wilderness Alternative. Although this rugged area has excellent opportunities for wilderness recreation and solitude, a time limit of 10 years would enable mineral exploration and development to occur if a realistic opportunity for these minerals exists in economic quantities. If, after 10 years, there is no development, then I suggest that the remaining acreage be added to the wilderness. During the 10-year interim, the area should be managed to protect its wilderness values while allowing for mineral exploration and development. That portion utilized for mineral development would be eliminated from further wilderness consideration. [Michael Van Note]

**6.15 RESPONSE:** See the responses to General Comments 1.1 and 15.5 and Specific Comments 1.6, 6.1, and 6.3.

**6.16 COMMENT:** Deletions in the lower benchlands are recommended by BLM to remove alleged ORV conflicts. BLM offers no evidence of a management problem. When asked about designation of areas where ORVs are limited to existing ways, it was called unnecessary since there was no management problem. BLM too often waits until ORV damage has occurred before taking action. Other agencies and divisions of BLM have successfully managed ORVs to protect wilderness values in similar types of terrain. BLM is required to supply objective data supporting their conclusions. In the case of ORV management, none has been provided. [Utah Wilderness Coalition]

Inclusion of the benchlands will increase the recreation values throughout the unit, including dayhiking, camping, nature study, photography, and rock climbing. The control of ORVs increases the recreation experience even more.

**6.16 RESPONSE:** The references to ORV conflicts on the lower benchlands mentioned under the Manageability section (SSA for Swasey Mountain WSA) were deleted in the Draft EIS. As noted on Page 25 of the Swasey Mountain analysis (Volume II of the Draft EIS: "Little ORV use is occurring now nor is any increase expected to occur . . ." The majority of the WSA is too steep and rocky for vehicular use of the existing roads and trails. Deletion of the benchlands in BLM's Proposed Action is not based on ORV conflicts, but on the lack of mandatory wilderness criteria (see Appendix 11 in Volume I).



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 6: SWASEY MOUNTAIN WSA (CONTINUED)**

**6.17 COMMENT:** Page 9, Geology: There is no mention of rock units, ages, alteration, etc., in the WSA; again, as in the description of the Rockwell WSA, it is more of a physiographic than a geologic description. [State of Utah]

**6.17 RESPONSE:** See the responses to General Comments 11.1 and 11.2. The Geology section has been retitled Geology and Topography.

**6.18 COMMENT:** By trade, I am a consulting geologist. I have studied a few of the WSAs in this report, including the Rockwell, Howell Peak, and Swasey Mountain WSAs. I have found that the geology done for the areas was very vague and inconclusive. It was bad. [Robert Steel]

**6.18 RESPONSE:** The Geology section has been revised and retitled Geology and Topography. Also, see the responses to General Comments 11.1 and 11.2.

**6.19 COMMENT:** A wide range of values should be considered in assessing the diversity of our wild lands. Greater consideration needs to be given to the unique mountain mahogany forest found on Swasey Mountain. It is too simplistic to characterize this area as a pinyon-juniper forest. [Utah Wilderness Coalition]

By eliminating the benchlands, BLM eliminated various types of shadscale-tetradymia and shadscale and shadscale-Indian ricegrass faciations of the shadscale ecosystem. This decreases the diversity of the ecosystems found in the NWPS. Even with the oversimplification of the ecosystem typing, BLM has identified a unique ecosystem not represented elsewhere, the saltbush (shadscale) greasewood type.

**6.19 RESPONSE:** The mountain mahogany in the Swasey Mountain WSA is part of the "island ecosystems" found on the mountains of Utah's West Desert. Therefore, the vegetation discussion has been changed to indicate that mountain mahogany is scattered among bristlecone pine near ridgetops. Mountain mahogany is not unique to the West Desert.

As stated in the Vegetation sections, the remaining vegetation types are typical of the West Desert and are not of special significance.

The pinyon-juniper forest referenced in the comment is the Potential Natural Vegetation (PNV) of the WSA and is not the present vegetation type.

**6.20 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM's consideration. [Utah International, Inc.]

Numerous roads, jeep trails, and mining-related structures are located throughout the area.

The WSA is an historic producer of lead, zinc, silver, copper, and gold. Moderate potential exists for future production of gold, silver, molybdenum, lead, and zinc in intrusive and sedimentary rocks.

**6.20 RESPONSE:** The text of the Final EIS has been revised to include the information available to date. This includes the potential for sediment-hosted disseminated gold deposits and associated minerals.

Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5, which explain the analysis assumptions and updating of mineral information for the Final EIS.

**6.21 COMMENT:** The Sand Pass-Swasey Mountain gold prospect includes 368 lode mining claims and three State land sections, or approximately 9,280 acres in Juab and Millard Counties, west-central Utah. [Gerald Dalton]

Fifty-eight exploration drill holes have been completed in the prospect from 1978 through 1986 by five major mining companies. Despite the number of drill holes, most of the area remains unexplored, including significant mineral, alteration and structural trends, and specific target zones, some of which are described in an attached report.

All but two of the 58 drill holes completed are in the northwest half of the prospect. The two remaining holes were drilled at the north end of the southeast half of the property. Here too, as in the northwest half of the prospect, are significantly altered and mineralized areas that have not been explored. The reasons for the discrepancy in the number of drill holes completed in each half of the prospect are explained in the report.

In west-central Utah and the Sand Pass-Swasey Mountain gold prospect, the Chisholm Formation, and lower in the stratigraphic sequence, the Pioche

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 6: SWASEY MOUNTAIN WSA (CONTINUED)

Formation (Ophir equivalent), are chemically favorable to disseminated and replacement-type precious metal deposits, respectively. Specific information is provided to document the presence of mineralization in the Swasey Mountain WSA.

**6.21 RESPONSE:** BLM geologists have reviewed the information provided in the comment and attached report. The Final EIS has been revised to include the pertinent and accurate information provided.

**6.22 COMMENT:** Freeport has filed a Plan of Operations with the Richfield District Office under 43 CFR 3802 and 43 CFR 3809 for exploration drilling around and within the following areas of the WSA: Section 31, Township 14 South, Range 13 West; Sections 23, 25, 26, 35, and 36, Township 14 South, Range 14 West; Sections 6, 7, 18, and 19, Township 15 South, Range 13 West; Sections 1, 12, and 13, Township 15 South, Range 14 West. All of this area has valid claims, some predating the WSA. It is Freeport's objective to drill for a large tonnage gold ore body within the WSA. The rock, structure, and alteration are similar to the Drum Mine, one mountain range to the east. In addition, the surrounding area, all within the Proposed Action (Partial Wilderness Alternative) boundary, is highly altered with significant rock geochemistry, suggesting gold mineralization exists outside the area of immediate drilling. We, therefore, believe that there is gold potential for a Jerritt Mine-type operation within the northern part of the WSA. The Jerritt Mine, located in northern Elko County, Nevada, is owned by Freeport and is the second largest gold mine in the U.S. [Freeport-McMoRan Gold Company]

I, therefore, must take exception to Table 4 (page 12) entitled "Mineral and Energy Resource Rating," and the Locatable Minerals section of each of the wilderness alternatives. The gold potential, as described above, is not addressed. This is because SAI was unfamiliar with disseminated gold exploration models and did not correlate the potential of the northern Swasey Peak with the Drum Mine to the east. Many disseminated gold mines have been discovered in the last few years because the subtle mineralization was unrecognized by early prospectors. Such a discovery, we believe, may exist south of the Sand Pass area.

Therefore, the statement: ". . . The likelihood of development is thought to be minimal due to . . . low potential" is inaccurate.

**6.22 RESPONSE:** The potential for disseminated gold deposits in the northern end of the WSA has been recognized in the Final EIS, and a new Partial Wilderness Alternative has been analyzed to avoid conflicts between wilderness designation and potential mineral development.

**6.23 COMMENT:** The same type of gold and silver deposits that have been found in Nevada are likely to be found in these WSAs, and that was not mentioned in the EIS. [Robert Steel]

**6.23 RESPONSE:** See the responses to Specific Comments 6.21 and 6.22.

**6.24 COMMENT:** Page 13, Locatable Minerals: Arsenic, antimony, and mercury reported to occur on claims in the WSA are "pathfinder" elements possibly indicative of disseminated gold. [State of Utah]

**6.24 RESPONSE:** See the responses to Specific Comments 6.20, 6.21, and 6.22.

**6.25 COMMENT:** I feel like the economic importance of these areas is much more important than the emphasis that was put on it by BLM. For instance, in the Notch Peak, Swasey, and Howell Peak areas, there are large deposits of high-grade limestone, the highest-grade limestone in the State of Utah. They are a considerable ways from the metropolitan area, but this limestone is one of the very important things we use to clean our air and powerplants. We are unquestionably a State that has a lot of energy, and we need limestone to clean that up. They make concrete and many things out of limestone. [Robert Steel]

**6.25 RESPONSE:** The extent of high-grade limestone is considerable, not only in the State of Utah, but in the United States. Since massive high-quality limestone deposits are located near centers of demand, limestone in WSAs is not considered a major potential conflict.

**6.26 COMMENT:** Page 14, Wildlife, Paragraph 2: The estimate of 500 deer using the area during the winter is low. Investigations by UDWR indicate 1,000 plus deer migrate into and/or through the area during the winter. [State of Utah]

**6.26 RESPONSE:** According to the revised wildlife numbers found in the Final EIS/RMP for the House Range Resource Area (USDI, BLM, 1986), the Swasey Mountain WSA would contain 800 to 900 deer during

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 6: SWASEY MOUNTAIN WSA (CONTINUED)

the winter, and 100 to 200 deer during the summer. There would be approximately 50 antelope in the WSA on a year-round basis. The Final EIS has been changed to reflect this information.

**6.27 COMMENT:** The Fish Springs WSA, Rockwell WSA, and Swasey Mountain WSA have only Class A and Class C scenic quality classifications. I find it hard to believe that no Class B scenic quality areas exist in these WSAs. [Owen Severance]

**6.27 RESPONSE:** See the response to Specific Comment 4.22.

**6.28 COMMENT:** Primitive recreation opportunities are enhanced by the availability of water from several springs, the outstanding vistas from the sheer cliffs on the west side, many secluded areas to camp, and numerous trails established by the wild horses. Unequaled vistas covering a multitude of Great Basin ranges and valleys are still without a serious scratch from man satiate the visitor. This same vista caught from another mountain, Mt. Howell, is not found by BLM to be outstanding. [Utah Wilderness Coalition]

**6.28 RESPONSE:** The quoted statement is from the SSA narrative prepared for the Swasey Mountain WSA, not the Draft EIS. The statement is a general description of values that enhance primitive recreation. Page 15 of the Swasey Mountain analysis (Volume II of the Draft EIS) indicates that "scenic vistas from the Swasey Mountain WSA are above average." The narrative in the Howell Peak SSA does not make a statement concerning vistas.

**6.29 COMMENT:** Special features abound in the area. Bristlecone pine, one of the oldest living things, is found in this area. According to a Smithsonian Institute report: "The trilobite beds in the southern portion of the WSA (some of which is deleted from the recommended wilderness area) are some of the most outstanding in the United States for gathering of fossils of the Cambrian geologic era. Forty different species have been found." Seven caves have been found and are of high quality because of their relatively undisturbed nature. [Utah Wilderness Coalition]

When BLM completes the required inventories of rare and endangered species, wildlife, archaeological sites, and other wilderness values, more special features will be found. Wilderness area deletions should not include special features.

**6.29 RESPONSE:** As noted on Page 9 of the Swasey Mountain (Volume II of the Draft EIS), under the Geology section: "Most fossil collecting takes place on a State Section outside the WSA." The majority of specimens found to date, including those reported in the Smithsonian Report, were collected from this location. There is a commercial digging operation using a backhoe for on-site extraction.

There is potential for more specimens at several locations within the WSA, 10 acres of which are located within the Partial Wilderness Alternative. No known significant special features have been excluded from the area recommended in the Partial Wilderness Alternative. Supplemental values are one of the four components of Criteria No. 1, outlined in the Wilderness Study Policy in evaluating the overall value of an area for wilderness suitability. These values are recognized in the Final EIS.

**6.30 COMMENT:** Page 3, Map 1: Section 2, Township 16 South, Range 14 West is State land, not BLM land, as shown. [State of Utah]

**6.30 RESPONSE:** Section 2, Range 16 South, Range 14 West is not public land. The map has been changed to show the land as State-owned.

## SECTION 7

### HOWELL PEAK WSA

**7.1 COMMENT:** By designating the large area as wilderness, Swasey Mountain will complement potential wilderness designation with Howell Peak and Notch Peak. These three areas could easily be considered the House Range Wilderness Complex for a better and larger management plan. [Sierra Club, Cache Group]

**7.1 RESPONSE:** See the responses to General Comment 3.28 and Specific Comment 6.8.

**7.2 COMMENT:** Howell Peak WSA has outstanding wilderness values and an overall low degree of conflicts compared to other WSAs in the region. The recommended 14,800-acre Partial Wilderness Alternative excludes areas of low wilderness quality which are probably unmanageable as wilderness due to ease of access by OHV use. The Partial Wilderness Alternative retains the outstanding wilderness quality areas and minimizes potential conflicts with mineral and livestock interests. [State of Utah]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 7: HOWELL PEAK WSA (CONTINUED)

The overall conflicts of a Partial Wilderness Alternative for this WSA are quite low.

**7.2 RESPONSE:** This WSA does not have outstanding opportunities for primitive-type recreation experiences. Also, outstanding opportunities for solitude are lacking on the lower benchlands. For this reason, a Partial Wilderness Alternative has been recommended. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

**7.3 COMMENT:** We disagree that the wilderness qualities of the bench area are not of the highest grade. They are a critical component for the protection of the entire biotic community in this area. The benches serve as critical habitat for wildlife during the winter and have a community of animals and plants that are not represented in the mountaintops. Deletion of this area would reduce its viability and diversity of the area. [Utah Wilderness Coalition]

**7.3 RESPONSE:** See the response to Specific Comment 4.2.

**7.4 COMMENT:** Here again, BLM has rather arbitrarily decided to eliminate the alluvial fans and foothills surrounding a cluster of fault block mountains. Although these are not perhaps as spectacular scenery-wise as the more rugged parts of the WSA, these slopes are still an important part of what makes up Basin and Range topography and landforms. Vegetation is often different here as well, with different plant communities occupying these slopes due to differences in soils and the availability of moisture. Such areas are unique in their own way and deserving of wilderness protection. I strongly recommend that all of this WSA be made wilderness. Again, this action would help to maintain an increased solitude and feeling of spaciousness within the wilderness. [Michael Van Note]

**7.4 RESPONSE:** See the responses to Specific Comments 4.2 and 6.19.

**7.5 COMMENT:** BLM gives no methodology for determining that part of the wilderness area which is outstanding and that area which is more than outstanding. BLM's Wilderness Study Policy does not allow the recommendation of an area as unsuitable because it must not only meet the required standard for wilderness, but exceed a standard higher than that. BLM is deleting areas with no conflicts and which possess the values necessary for wilderness. Under the Wilder-

ness Study Policy, this area should be recommended wilderness. We request that BLM describe the standards used, the methods to assess these standards, and the application of these methods to this area. This needs to be included in the Draft EIS. [Utah Wilderness Coalition]

**7.5 RESPONSE:** The 14,800 acres included in the BLM Proposed Action contain opportunities for outstanding solitude, while the areas dropped do not possess outstanding opportunities for solitude or primitive recreation. See Appendix 11 in Volume I for a summary of rationale for BLM's Proposed Action.

Also, see the responses to General Comments 8.11 and 22.5, which explain ranking of wilderness values when judging areas' suitability for wilderness designation.

**7.6 COMMENT:** I feel that the uniqueness and fragility of caves in general is also underestimated by BLM in its treatment of this and the Swasey Mountain WSAs. For example, over 75 percent of the caves I have visited have deposits of archaeological/paleontological interest. Even relatively educated cavers in organized groups are unable to recognize all of the values within a cave. Often, as a result, bones, torches, split-twigg figurines, unusual deposits, mineral formations, and various troglodytic fauna are trampled by well-meaning people. As a result, many individuals have taken it upon themselves to protect caves by simply not mentioning them to anyone but a few close and trusted comrades or scientists. I suspect that the number of caves actually known in this and adjacent WSAs is far greater than what BLM is aware of. The whole point of this is to stress the unique museum/laboratory/recreational experience that caves represent which must be given maximum consideration in any management decision. A larger wilderness will protect these resources by providing a greater security in the form of limited access, limited discovery of, and, hence, limited abuse by those resources, not to mention possible damage from mineral exploration/recovery. As caves are natural animal traps, hibernaculums, and shelters for man, I would suspect that every cave within BLM WSAs has items of paleontological and archaeological importance. Solitude is perfect in caves. [Michael Van Note]

**7.6 RESPONSE:** See the response to Specific Comment 6.10. The presence of at least three caves in this WSA is noted in the EIS.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 7: HOWELL PEAK WSA (CONTINUED)**

**7.7 COMMENT:** By trade, I am a consulting geologist. I have studied a few of the WSAs in this report, including Rockwell, Howell Peak, and Swasey Mountain WSAs. I have found that the geology done for the areas was very vague and inconclusive. It was bad. [Robert Steel]

**7.7 RESPONSE:** The Geology section has been revised and retitled Geology and Topography. Also, see the responses to General Comments 11.1 and 11.2.

**7.8 COMMENT:** The description of the No Action (and, by implication, the Proposed Partial Wilderness) Alternative states that the relatively low wildlife populations in the WSA should mean that there would be ample habitat adjacent to the proposed disturbances. Therefore, it is concluded that disturbances would cause no significant impacts to wildlife. This line of reasoning is badly flawed. For established populations, low densities are likely caused by some combination of resources, behaviors, and habitat available. Areas not occupied by the population may well not be suitable for any number of reasons. Under the realistic assumption that low habitat does not imply empty and suitable habitat, BLM's conclusion is spurious. [Scott Mills]

**7.8 RESPONSE:** Considering the small acreage of disturbance for the WSA reported in the Draft EIS, the statements made were accurate. However, analysis assumptions and disturbance estimates have been revised for the Final EIS. The Final EIS reports that no mineral-related surface disturbance is anticipated in the foreseeable future. Therefore, there is little or no immediate threat to habitat or wildlife under any of the alternatives.

Also, see the responses to General Comments 8.8, 9.4, and 9.12, which explain analysis assumptions and time frames.

**7.9 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should, therefore, be eliminated from consideration as a wilderness area. The following information is given for BLM's consideration. Roads and jeep trails cut into the middle and edges of the WSA. The WSA has a history of limited, minor production of lead, zinc, and silver. A moderate future potential exists for production of gold, silver, lead, zinc, copper, and molybdenum in sedimentary and intrusive rocks. [Utah International, Inc.]

**7.9 RESPONSE:** See the responses to Specific Comments 6.21 and 7.10.

**7.10 COMMENT:** According to SAI (1982), the mineral potential of this WSA is ranked as low. This statement is untrue. Gold, silver, lead, and copper ore of economic grade have been found within the south boundary of the WSA. Although the deposit is relatively small, approximately 200,000 to 300,000 tons, the geology is such that it could exist anywhere within the WSA. [Robert Steel and Gerald Dalton]

**7.10 RESPONSE:** The OIR has been deleted in the Final EIS and individual minerals have been evaluated on their own merits. See the response to General Comment 15.7.

BLM geologists have reviewed the available information and conclude that there are no known occurrences of locatable base and precious metals inside the WSA. There is a low certainty (c1) that small (f2) deposits of these minerals exist in the WSA, but economic production of minerals is not projected in the foreseeable future. Also, see the responses to General Comments 15.2 and 15.54, which discuss estimates of mineral quantities in WSAs.

**7.11 COMMENT:** Page 12, Locatable Minerals: There is no mention of potential for gold associated with volcanics or disseminated into sediments juxtaposed with volcanic centers. There is also no mention of potential for carbonate-hosted silver, lead, zinc, etc. [State of Utah]

**7.11 RESPONSE:** Volcanics and the presence of carbonate host rocks are addressed in the Draft and Final EISs. Also, see the response to Specific Comment 7.10.

**7.12 COMMENT:** The same type of gold and silver deposits that have been found in Nevada are likely to be found in these WSAs, and that was not mentioned in the EIS. [Robert Steel]

**7.12 RESPONSE:** See the response to Specific Comment 7.10.

**7.13 COMMENT:** I feel like the economic importance of these areas is much more important than the emphasis that was put on it by BLM. For instance, in the Notch Peak, Swasey, and Howell Peak areas, there are large deposits of high-grade limestone, the highest-grade limestone in the State of Utah. They

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 7: HOWELL PEAK WSA (CONTINUED)

are a considerable ways from the metropolitan area, but this limestone is one of the very important things we use to clean our air and power plants. We are unquestionably a State that has a lot of energy, and we need limestone to clean that up. Limestone also makes concrete and many things. [Robert Steel]

**7.13 RESPONSE:** See the response to Specific Comment 6.25.

**7.14 COMMENT:** Page 11, Vegetation: It would be clearer if the words "are known to" were inserted prior to the word "occur." [State of Utah]

**7.14 RESPONSE:** The wording has been changed as suggested in the comment.

**7.15 COMMENT:** I would also like to take this time to comment on the visual resource classification used by BLM, as it apparently takes into account none of the subsurface visual features as are found in caves such as those located within the WSA. As a caver (or spelunker) for over 15 years, I have had the opportunity to explore caves all over North America. [Michael Van Note]

Often, some of the most spectacular subterranean scenery (be it in the form of speleothems, domepits, hallways, etc.) are found beneath a surface which is anything but exciting visually. I feel that the presence of solution caves, known or inferred, should give no small weight to visual resource classification. Though caves represent a small percent of total landform area, their presence generally changes the character and perception of that area considerably.

**7.15 RESPONSE:** The scenic features inside caves are not considered a visual resource because they have little in common with surface scenery. Distance zones, form, line, color, and texture of these features do not lend themselves to BLM's visual resource classification system. In addition, the potential threats to these features are not the same as for surface scenery. Caves are considered in the EIS as geologic and wilderness special features that provide recreational opportunities.

**7.16 COMMENT:** Page 14, Cultural Resources: The statement on cultural resources is well done. [State of Utah]

**7.16 RESPONSE:** See the response to General Comment Section 20, Cultural Resources.

**7.17 COMMENT:** Part of the eastern boundary for the Howell Peak WSA appears to be drawn on the 1,600-foot (or 2,000-meter) elevation contour between State Sections 16 and 32. We would much prefer the boundary be made at the 6,400-foot contour starting at the southeast corner of Section 16 and ending at the northeast corner of Section 32. On Page 26 a comment is made that closing 3 miles of roads to ORV use would "make existing activity for cave exploring somewhat less convenient." To our organization (spelunkers) this is of insignificant importance--we fully support the road closures. [Spelunkers]

**7.17 RESPONSE:** The WSA boundaries were established during the inventory phase of the wilderness review. See the response to General Comment 3.1.

**7.18 COMMENT:** WSA numbers 7 (Howell Peak) and 9 (Notch Peak): These two areas are separated by Rainbow Valley, a corridor for two existing 230-kV lines. This valley is also a major east-west corridor that has received interest from several utility companies. [Utah Power and Light]

In designating these WSAs as wilderness areas, existing transmission facilities, room for maintaining them, and the potential major transmission corridor must be protected.

**7.18 RESPONSE:** The utility corridor referred to has been designated as an official corridor for rights-of-way in the House Range and Warm Springs RMPs. These plans state that future major east-west rights-of-way in this area will be located, where possible, inside this corridor. This utility corridor is outside both the Howell Peak and Notch Peak WSAs and is, therefore, not discussed in the EIS.

**7.19 COMMENT:** Page 16, Column 1, Paragraph 1: Township 18 South, Range 14 West, Section 2: S1/2, NW1/4, NW1/4, NW1/4, N1/2, SW1/4, NW1/4, NW1/4, is leased to the U. S. Air Force for the installation of a HAMOTS facility. The facility will be installed (constructed) this year. [State of Utah]

**7.19 RESPONSE:** The site referred to in the comment is in an in-held State section and would not be directly affected by wilderness designation.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 8: CONGER MOUNTAIN WSA**

**SECTION 8**  
**CONGER MOUNTAIN WSA**

**8.1 COMMENT:** Page 3, All Wilderness Alternative, Paragraph 1: The word "not" should be deleted from the sentence, "Two of seven State sections adjacent to the WSA likely would not be exchanged." [State of Utah]

**8.1 RESPONSE:** The word "not" should not have been printed in the Draft EIS. The State of Utah's policy on State exchanges within and adjacent to WSAs has changed since the Draft EIS. See the response to General Comment 23.10.

**8.2 COMMENT:** BLM should adopt the Utah Wilderness Coalition's alternative for the Conger Mountain WSA. [Sierra Club, Cache Group; Owen Severance; and others]

a. Once again, screening was used to define solitude and, therefore, limit the amount of the WSA with outstanding solitude. The reasons cited for downgrading the primitive recreation values are nonsense. There are no significant mineral conflicts. The Utah Wilderness Coalition's Partial Wilderness Alternative includes the area with the highest wilderness values, and it should be adopted by BLM.

b. Note that the Utah Wilderness Coalition's proposal is within the 20,400-acre WSA. The smaller acreage excludes any real and potential conflicts.

**8.2 RESPONSE:** Screening, along with size and location, was used in defining solitude. BLM has reviewed the wilderness values and determined that primitive recreation values are not outstanding in this WSA. Over 50 percent of the WSA does meet the requirements to provide outstanding solitude.

The Utah Wilderness Coalition's proposal also includes a State section. BLM's wilderness review addresses public lands. See the response to General Comment 6.4.

Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action. The Utah Wilderness Coalition's proposal has been considered but not adopted by BLM.

**8.3 COMMENT:** Many of the WSAs in the Great Basin region have been found unsuitable, in spite of their significance in fulfilling all of the qualifying criteria for wilderness designation. The EIS finds that WSAs are not scenic, that wilderness character is not as significant as in other areas, and so on. Two observations seem relevant: [Mark Peterson]

a. Wilderness designation is not a process of elimination. Each WSA must be assessed on its own merits.

b. Highly subjective reasoning (i.e., defining an area as scenic or not scenic) must be limited in favor of more empirical measures. The key criteria are whether an area meets the standards prescribed in the Wilderness Act and whether significant resource conflicts exist.

Accordingly, at least three WSAs should be found suitable for designation: Cedar Mountains, Conger Mountain, and King Top. All fulfill the essential criteria: outstanding opportunities for solitude and an absence of substantial human impacts.

In addition to fulfilling these qualifications, these areas possess significant natural resources, including wild horses, fossil-bearing rocks, and important wildlife habitat. All of these areas are suitable for designation and should be recommended by BLM.

**8.3 RESPONSE:** See the responses to Specific Comment 2.9 and General Comments 3.14, 8.6, 8.22 and 19.1. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action.

**8.4 COMMENT:** BLM concludes, since the wilderness values of this WSA are generally of low quality and since little or no contribution would be made to the diversity of the NWPS, Conger Mountain WSA does not warrant wilderness designation. BLM record fails to support this conclusion. The record shows that the area meets the mandatory wilderness criteria and offers additional features with a diversity of high quality activities. Recommending an area unsuitable based solely on a wilderness value rating system violates the Wilderness Study Policy. This area does qualify and should be designated. [Utah Wilderness Coalition]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 8: CONGER MOUNTAIN WSA (CONTINUED)

**8.4 RESPONSE:** See the responses to Specific Comment 8.2 and General Comments 8.11 and 22.5 for discussions on the ranking of wilderness values.

**8.5 COMMENT:** The Conger Mountain area supports a wild horse herd of about 70 animals. It also provides important habitat for pronghorn antelope, mule deer, and chukar partridge. BLM has not identified any significant mineral or development conflicts anywhere in the WSA. We disagree with BLM's final assessment that this area has low wilderness character because it is simply not as good as other areas. We have found high quality solitude and excellent opportunities for primitive outdoor recreation within a very natural and scenic environment. Whether it is as good as another WSA is strictly a matter of opinion. [Sierra Club, Cache Group]

**8.5 RESPONSE:** There are approximately 10 deer and 15 antelope found in the WSA year-round; 40 deer are found in the WSA only during the winter. There are approximately 60 wild horses whose use is well distributed throughout this WSA. BLM plans to maintain about 70 wild horses in the Conger Mountain area. Our analysis of the recreation opportunity indicates that horseback riding and wildlife sightseeing are good, while backpacking, camping, dayhiking, hunting, nature study, photography, and rockhounding are fair to poor. Overall, the area does not provide outstanding recreational opportunities. Approximately 30 percent of the WSA does not provide opportunities for solitude due to sparse, low-growing vegetation and relatively flat topography. The remaining 70 percent does provide for outstanding solitude. Also, see the responses to Specific Comments 8.2 and 8.4.

**8.6 COMMENT:** The State concurs with the finding that there appears to be a lack of outstanding wilderness qualities to support a wilderness recommendation for Conger Mountain WSA, although it could contribute to diversity of wilderness areas. Apparent conflicts exist with livestock operations. [State of Utah]

**8.6 RESPONSE:** The Conger Mountain WSA does meet the mandatory criteria for solitude on 70 percent of the area. These are supplemental values in the WSA, but these are in common with the other West Desert WSAs.

Other West Desert mountain ranges with outstanding wilderness qualities have landforms similar to those found in the Conger Mountain WSA. Therefore,

Conger Mountain WSA would not contribute to diversity in the NWPS. No significant conflicts with livestock operations have been identified.

**8.7 COMMENT:** The analysis fails to indicate if the required comprehensive inventories required of the planning system have been completed. No reference to inventory reports on archaeological sites, rare and endangered species, wildlife, and other wilderness values is made in the SSA. Multiple-use benefits from wilderness designation are inadequate in the analysis. The lack of information on these wilderness values makes quantitative analysis of multiple-use benefits and estimates of impacts on these values difficult. BLM needs to emphasize filling this large hole. [Utah Wilderness Coalition]

**8.7 RESPONSE:** See the responses to General Comments 9.6, 13.1, 16.2, 20.2, and 22.1, which discuss the need to inventory wilderness and other resource values.

**8.8 COMMENT:** Industry sources believe that this WSA includes areas with a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM's consideration. Numerous roads and jeep trails cut throughout the area. The WSA has had minor, limited production of lead, zinc, and silver. Moderate potential exists for future production of lead, zinc, silver, copper, gold, and beryllium from sedimentary rocks. [Utah International, Inc.]

**8.8 RESPONSE:** BLM has reviewed and updated the mineral information used in the EIS. The review indicates that there is a low degree of certainty for small deposits of locatable minerals in the WSA. No economic development is projected for these minerals in the foreseeable future.

There is a slightly higher degree of certainty for small deposits of oil and gas, and exploration is projected within the foreseeable future.

Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5 which explain analysis assumptions and updating of mineral information for the Final EIS.

**8.9 COMMENT:** Page 18, Locatable Minerals: In place of the wording ". . . if minerals are located prior to wilderness designation . . ." use ". . . if a



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 8: CONGER MOUNTAIN WSA (CONTINUED)**

discovery is perfected prior to wilderness designation . . ." [Agency comment]

**8.9 RESPONSE:** Due to the low likelihood of development, the wording in the Final EIS now indicates that no surface disturbance related to locatable minerals is projected in the foreseeable future.

**8.10 COMMENT:** The analysis identifies the presence of 13,688 acres of pre-FLPMA oil and gas leases. No detail is given on their management stipulations. [Utah Wilderness Coalition]

**8.10 RESPONSE:** There are currently no oil and gas leases in the WSA, and the Final EIS has been changed accordingly.

**8.11 COMMENT:** Page 10, Wildlife, Paragraph 3: The WSA is located within the West Desert Antelope Herd Unit and not the Southwest Desert Antelope Herd Unit, as stated. [State of Utah]

**8.11 RESPONSE:** The Conger Mountain WSA is in the West Desert Antelope Herd Unit, not the Southwest Desert Herd Unit, as indicated in the Draft EIS. The text has been changed to read, "West Desert Herd Unit."

**8.12 COMMENT:** For the Conger Mountain WSA, no information is included on scenic quality or VRM classifications. This problem with visual resource ratings exists throughout Utah. There is little consistency between the various Districts other than a consistent downgrading of the scenic quality ratings. [Owen Severance]

**8.12 RESPONSE:** Scenery classifications for the Conger Mountain WSA are outlined on Page 11 of the Conger Mountain WSA analysis (Volume II of the Draft EIS). No VRM classification, however, had been completed on the area at the time the Draft EIS was prepared.

Since the publication of the Draft EIS, a VRM evaluation and subsequent classification have been completed. A summary of this information is included in the Final EIS. BLM Manual 4800 outlines the rating factors for assessing an area's visual qualities. This system is used to provide continuity throughout public lands. See Appendix 7 in Volume I for definitions of VRM terms.

Also, see the responses to Specific Comment 8.2 and General Comments 9.8 and 19.1.

**8.13 COMMENT:** Page 11, Cultural Resources, Paragraph 3: There are records of some historic ranches in the area. The Draft EIS neglects this information. [State of Utah]

**8.13 RESPONSE:** The Cultural Resources section of the Conger Mountain WSA analysis notes that ranchers have used this area for many years; however, no historic ranch structures are known to occur within the WSA.

**8.14 COMMENT:** In BLM's wilderness opportunity rating system, below average meets the mandatory wilderness criteria; that is, below average means the activity opportunity is outstanding. Although not discussed, this area offers excellent hunting for antelope and deer. Sightings of wild horses (an estimated 60 use this area) are confirmed and are most frequently seen away from the boundary road. [Utah Wilderness Coalition]

**8.14 RESPONSE:** Opportunities for recreation, solitude, and primitive and unconfined recreation are not rated as being outstanding. Conger Mountain WSA has very small deer and antelope populations. The hunting opportunity is present, but chances of success are limited; therefore, this opportunity cannot be considered excellent.

The WSA contains crucial habitat for the Conger Mountain wild horse herd, although horses are rarely seen by visitors to the WSA.

Also, see the responses to Specific Comments 8.2, 8.3, and 8.4.

**8.15 COMMENT:** BLM limits the assessment of solitude to areas where the visitor is confined by vegetation or geologic barriers. This limited assessment is inconsistent with the inventory and Wilderness Study Policy. Even so, BLM used limited criteria and found that this area met the mandatory wilderness criteria for solitude. If the full criteria were applied, a larger area would be assessed as outstanding. [Utah Wilderness Coalition]

**8.15 RESPONSE:** See the responses to General Comments 2.12, 3.1, 8.11, 21.12, 22.3, and 22.5, which discuss the Inventory Phase and ranking of wilderness values.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 8: CONGER MOUNTAIN WSA (CONTINUED)

**8.16 COMMENT:** Page 12, Land Use Plans and Controls, Paragraph 2: Part of an adjacent State section (Township 17 South, Range 17 West, Section 36) is leased to the U. S. Air Force for the installation of a HAMOTS facility. The facility will be installed (constructed) this year. [State of Utah]

**8.16 RESPONSE:** The site referred to in the comment is a State of Utah section, and placement of communication facilities in this section will not be affected by wilderness designation.

### SECTION 9 NOTCH PEAK WSA

**9.1 COMMENT:** The Notch Peak wilderness area should include Painter Spring, and motorized access to Painter Spring should be eliminated. Recreation at Painter Spring should be monitored to protect the insular plants and animals found at the spring. Further, the recreation up the adjacent canyons should be closely monitored and trails constructed, if necessary, to protect the granitic substrate and riparian zones in these canyons. [Utah Nature Study Society]

**9.1 RESPONSE:** Painter Spring was excluded from the WSA because of the man-made intrusions (a road, pipeline, and spring development).

Also, see the response to General Comment 3.1, which discusses BLM's inventory process.

**9.2 COMMENT:** The wilderness boundary was unfortunately drawn to exclude Painter Spring, the most important permanent water and riparian habitat in the WSA. We suggest establishment of a parking area 0.25 to 0.50 mile below Painter Spring. This would maximize camping potential near the spring while minimizing damage. [Wasatch Mountain Club]

**9.2 RESPONSE:** See the response to Specific Comment 9.1.

**9.3 COMMENT:** On the basis of improved manageability of the wilderness values and additional diversity for outstanding opportunities, we recommend a different partial WSA boundary than BLM's 28,000-acre proposal. By using topographic features more uniformly, manageability of the land would be enhanced. We recommend a 40,000-acre Partial Wilderness Alternative using a boundary that would: (1) exclude

the northeast arm of the WSA because of the impact of past mineral exploration, much as the 28,000-acre BLM's Partial Wilderness Alternative recommends; (2) follow topography to take advantage of the terrain in establishing a natural area perimeter; (3) include all or portions of State sections on the WSA boundary where they benefit manageability and the natural perimeter concept, under the reasonable assumption that, like the State sections within the WSA, those on the periphery would also be exchanged should the area be designated wilderness; and (4) enhance the diversity of the potential wilderness by including the southern slopes of the WSA which comprise varied canyon and rolling terrain with effective natural barriers that would enhance manageability. See the attached map for specific boundary references. [Marvin Poulson]

We believe that the merits of the area and the manageability issue support a 40,000-acre preferred alternative.

**9.3 RESPONSE:** Your recommendation for a 40,000-acre Partial Wilderness Alternative and the four reasons you noted as support for your recommendation, were analyzed as follows: (1) exclude the northeast area: this is the same as our 28,000-acre Partial Wilderness Alternative; (2) follow topography to take advantage of terrain: your recommendation is very similar to the BLM for the northern portion. The southern portion is different (refer to Item 4); (3) include all portions of State sections on the WSA boundary. Originally, BLM included State land, either all or partial sections. However, State policy has now been changed. General Comment Response 6.3 describes the current status of this subject; (4) enhance the diversity by including the southern slopes. The southern portion of the WSA does not possess outstanding primitive recreation or solitude; therefore, it is BLM's opinion that it is not suitable for wilderness designation.

**9.4 COMMENT:** BLM's proposal to designate wilderness at Notch Peak is good. However, it is not large enough. It should include 40,000 acres, not just 28,000. The most imposing feature of Notch Peak is the rise of the peak from its surroundings. Its surroundings must also be protected to preserve the essence of this area. Partial wilderness does not allow people to experience and get to know, scientifically or philosophically, the world around them. As a biologist and a teacher, I know that we must

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 9: NOTCH PEAK WSA (CONTINUED)

have intact ecosystems to get to know nature or ourselves. [John Lockhart]

**9.4 RESPONSE:** See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action. Also, see the response to Specific Comment 9.3.

**9.5 COMMENT:** Acreage in the southern portion of the WSA forms a logical extension to the proposed wilderness area. Inasmuch as no substantial conflicts exist, this acreage should be included in the recommendation. [Mark Peterson]

**9.5 RESPONSE:** See the response to Specific Comment 9.1.

**9.6 COMMENT:** The benchlands should be designated wilderness. [Sierra Club, Cache Group; Michael Van Note]

a. By designating the large area as wilderness, Swasey Mountain will complement potential wilderness designation with Howell Peak and Notch Peak. These three areas could easily be considered the House Range Wilderness Complex for a better and larger management plan.

b. BLM's proposed 28,000-acre wilderness is a step in the right direction, but I feel that, like many previously mentioned WSAs, the gently inclined lower slopes should be included to preserve the overall character of the landforms present and to enhance the overall solitude. The southern portion of the WSA is especially important in this respect. The ways present here provide good hiking access, and wilderness designation would put everyone on an equal footing, so to speak, when using this area. It would seem important here to note that the presence of three roadless areas essentially back to back is an additional enhancement over and above the recreation available in either of the WSAs singularly by allowing for a series of recreational experiences within the same close geographical area or a long multi-day ridge crest hiking route with resupply available at road crossings in between. Wilderness designation for nearby WSAs adds to the solitude, scenic vistas, and general experience found within other WSAs. I would recommend that all of this WSA be designated wilderness, particularly the BLM-proposed 28,000 acres and the southern 18,000 to 20,000 acres of the foothills and fans.

**9.6 RESPONSE:** See the response to Specific Comment 6.8.

**9.7 COMMENT:** BLM provides no specific rationale for the Proposed Action, only states that boundaries are drawn to exclude 23,000 acres that do not offer outstanding opportunities for solitude and primitive and unconfined recreation, based on outside sights and sounds (for operations that are not now occurring or anticipated to be active under current or future market conditions), existing ways (though stated as not detracting from the area as a whole), and lack of topographic or vegetative screening (though the area is considered rugged, BLM says that ORV use is very limited by "topographic restraints" and that the area has diverse vegetative cover, including significant stands of pinyon-juniper and is "substantially in a natural condition"). We also question the apparent inconsistency in the mineral/oil and gas rating of 2+, which is elsewhere stated as low potential or insignificant. [Utah Wilderness Association]

**9.7 RESPONSE:** See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

Also, see the response to General Comment 22.3, which discusses inconsistencies in the identification of wilderness values.

**9.8 COMMENT:** No clear rationale for the 28,000-acre Partial Wilderness Alternative is presented. We can only surmise rationale based on BLM's common references to 23,000 acres that have "substantially unnoticeable" ways and mining claims, and the similar acreage of "foothill" terrain that BLM says does not offer sufficient topographic and/or vegetative screening to pass BLM's subjective judgment. Certainly, the stated insignificant minerals nor oil and gas potential do not justify the recommendation. [Marvin Poulson]

**9.8 RESPONSE:** See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

**9.9 COMMENT:** This WSA has impressive 3,000-foot vertical cliffs that should be protected through wilderness designation; important stands of bristlecone pine are also found here. From the top of Notch Peak, one can experience 100-mile views that clearly add to the wilderness experience. We cannot determine from BLM's analysis why the north and south tracts of this WSA were deleted. There are no

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 9: NOTCH PEAK WSA (CONTINUED)

apparent conflicts with wilderness designation. [Sierra Club, Cache Group]

**9.9 RESPONSE:** The north and south tracts were not included in the Proposed Action because they lack outstanding opportunities for solitude and primitive, unconfined recreation (see Appendix 11 in Volume I).

**9.10 COMMENT:** Notch Peak WSA possesses both high wilderness values and a high degree of conflict with other potential land uses. The proposed 28,000-acre Partial Wilderness Alternative eliminates much of this conflict; however, from a mineral and livestock perspective, the smaller 9,000-acre Partial Wilderness Alternative is preferable. Overall, the Proposed Action significantly reduces these conflicts and retains the highest quality wilderness values. [State of Utah]

The overall impacts of the 28,000-acre Partial Wilderness Alternative for this WSA are considered potentially significant, but must be balanced with outstanding wilderness values. The smaller 9,000-acre alternative could reduce these remaining potential impacts but would also reduce wilderness values. In its comments on the Warm Springs Resource Area Draft RMP/EIS, the State supported designation of a 9,000-acre Notch Peak National Natural Landmark.

**9.10 RESPONSE:** The proposal for Notch Peak is to reduce the size to 28,000 acres. To reduce this area to 9,000 acres could avoid other possible conflicts, but BLM does not believe this possibility justifies excluding these wilderness values from protection.

The comments on the Warm Springs Resource Area RMP were considered in that document.

**9.11 COMMENT:** In the earlier wilderness study, BLM deleted parts of areas for mineral conflicts. This was corrected in the EIS. Minerals do not pose a conflict since their development would not be feasible. [Utah Wilderness Coalition]

**9.11 RESPONSE** No mineral development is projected within the WSA in the foreseeable future. Mineral conflicts in the short term are not used as rationale for BLM's Proposed Action (see Appendix 11 for a summary of the rationale).

**9.12 COMMENT:** By trade, I am a consulting geologist. I have studied a few of the WSAs in this report, including Rockwell, Howell Peak, and Swasey Moun-

tain WSAs. I have found that the geology done for these areas was very vague and inconclusive. It was bad. [Robert Steel]

**9.12 RESPONSE:** See the responses to General Comments 11.1 and 11.2. Additional information has been added to the Geology and Topography sections of the Final EIS.

**9.13 COMMENT:** Page 15, Geology: The overall geologic description is poor. What are the ages and facies of rock outcrops? What alteration is noted at contacts with the Jurassic intrusive? Are there any low-angle faults described? As noted on Page 17, gold and tungsten have been mined in the area. Mineral potential could be in excess of the favorability noted in Table 4, Page 16. [State of Utah]

**9.13 RESPONSE:** See the responses to Specific Comments 9.12 and 9.20.

**9.14 COMMENT:** Notch Peak is a distinctive example of blockfaulted mountains. BLM's discussion here revolves exclusively around topography not geology. Formations and structure present are of particular relevance considering the impressive 3,000-foot escarpment of Notch Peak. [Marvin Poulson]

**9.14 RESPONSE:** The comment is quoted from Volume II, Notch Peak WSA analysis Geology Section. The geology of Notch Peak is well described in the WSA's literature.

**9.15 COMMENT:** Vegetation: According to Welsh (1986), a newly described rare species has been identified in the House Range. The species is Primula domensis. [State of Utah]

**9.15 RESPONSE:** The Final EIS has been reviewed to include a discussion of the recently described species, Primula domensis. This species is a narrow endemic apparently restricted to limestone crevices in the House Range (Welsh, et al., 1987). FWS personnel indicate that the species may be listed as a Category 2 candidate species when the threatened, endangered, and sensitive plant species list is revised and published in the Federal Register. However, little is known about this species and additional studies are needed.

**9.16 COMMENT:** Diverse vegetative types in the WSA include isolated stands of white fir, Ponderosa pine, aspen, and bristlecone pine. Some ancient

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 9: NOTCH PEAK WSA (CONTINUED)**

bristlecone pine may be present, although not noted. BLM identifies only three sensitive plant species as present: Eriogonum ammophilum, Astragalus callithrix, and Eriogonum nummular. It should be pointed out that at least one other newly described rare and potentially threatened species exists, Primula domensis, discovered by R. Kass while doing graduate work on the flora of the House Range at Brigham Young University. [Marvin Poulson]

**9.16 RESPONSE:** The Notch Peak WSA does contain diverse vegetation types, including a small bristlecone pine stand, as is recognized and discussed in the EIS. The FWS review of threatened, endangered, and sensitive plant species likely to be located in the WSAs (see Appendix 4 for details) resulted in minor changes from that listed in the Draft EIS. No listed threatened or endangered plant species are located in the Notch Peak WSA. The WSA does have two Category 1 and 2 candidate plant species, Eriogonum ammophilum and Cryptantha compacta. The Final EIS has also been revised to include a discussion of the recently described species, Primula domensis.

**9.17 COMMENT:** In the Notch Peak WSA, I saw about 20 different wild flowers, including one I believe is endangered. We also saw a peregrine falcon. [Richard Campanella]

**9.17 RESPONSE:** The Notch Peak WSA does contain a varied biotic community, as is noted in the EIS. While no threatened or endangered plant species are known to occur in the WSA, two Category 1 and 2 species have been found. These are discussed in the Vegetation section of the Notch Peak WSA analysis (Volume II of the Draft EIS). A third species, Primula domensis, a recently discovered narrow endemic species, is also believed to occur in the Notch Peak WSA.

**9.18 COMMENT:** BLM notes that there is no live water in the WSA. However, BLM fails to acknowledge that there are at least three springs near the area on Sawtooth Mountain. [Marvin Poulson]

**9.18 RESPONSE:** The wording in the first paragraph (Water Resources, Page 15) is correct. The EIS analysis deals with lands within the WSA.

**9.19 COMMENT:** Painter Springs, which is a natural spring in the area, has been developed for multiple-use concepts, for grazing and mining interests, for oil development, and so forth. I understand that there can be jeopardies to this water use, and we want to

maintain this water use for the permittees and multiple use in the area. [Utah Wool Growers]

**9.19 RESPONSE:** Wilderness designation would not affect present water uses; however, designation generally would preclude the construction of new water storage projects or new water-yield improvements that require surface disturbance. These techniques would be considered on a case-by-case basis. Uses with existing water rights (including upstream and downstream) would not be affected by designation. Painter Springs is outside the WSA and would not be affected by wilderness designation.

**9.20 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should, therefore, be eliminated from consideration as a wilderness area. The following information is given for BLM's consideration. [Utah International, Inc.]

Numerous roads, jeep trails, mining ruins and buildings are located in the area proposed for designation in the WSA.

The WSA has produced gold, tungsten, lead, copper, zinc, and silver. Moderate potential exists for future production of tungsten, molybdenum, copper, gold, lead, zinc, and silver in intrusive and sedimentary rocks.

**9.20 RESPONSE:** BLM has reviewed and updated the mineral information for the Final EIS. The review indicates that there is a low degree of certainty for small deposits of beryllium, lead, and zinc in the WSA. It is certain that there are small deposits of tungsten in the WSA, along with low-temperature geothermal resources. BLM does not project any economic development of minerals in the WSA in the foreseeable future.

Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5, which explain analysis assumptions and mineral information updating for the Final EIS.

**9.21 COMMENT:** The same type of gold and silver deposits found in Nevada are likely to be found in these WSAs; this was not mentioned in the EIS. [Robert Steel]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 9: NOTCH PEAK WSA (CONTINUED)

**9.21 RESPONSE:** See the response to Specific Comment 9.20.

**9.22 COMMENT:** The Mineral-Resource of Wilderness Study Areas report prepared by SAI, and the Oak Ridge National Laboratory October 1982 report rate the occurrence of tungsten as f2/c4. This rating is described by this report to mean: "The geologic environment of the area is considered favorable for the accumulation of small deposits, low-tonnage, low-grade, or low-volume resources." The report continues to state: "Abundant direct evidence is available from within and/ or very near the tract (WSA) to support or refute the existence of the resource." [Utah Wilderness Coalition]

For tungsten, Lemmon (1964) concludes that ore bodies in this WSA are mostly low grade and relatively small. BLM claims that designation would prevent recovery of up to 50,000 tons of tungsten. The number is not supported by the studies listed in the reference. We request that BLM describe the methods for calculating this, the full sources and their author, and the feasibility of development. BLM's numbers are arbitrary with this kind of support. Each of the mineral estimates have the same problem and we request this information for those as well.

**9.22 RESPONSE:** See the response to Specific Comment 9.20. The Final EIS does not project loss of any mineral production in the WSA in the foreseeable future.

**9.23 COMMENT:** I feel like the economic importance of these areas is much more important than the emphasis that was given by BLM. For instance, in the Notch Peak, Swasey, and Howell Peak areas there are large deposits of high-grade limestone, the highest-grade limestone in the State of Utah. They are a considerable way from the metropolitan area, but this limestone is one of the very important things we use to clean our air and powerplants. We are unquestionably a State that has a lot of energy, and we need limestone to clean that up. It also makes concrete and many other things. [Robert Steel]

**9.23 RESPONSE:** See the response to Specific Comment 6.25.

**9.24 COMMENT:** We use the alluvial area for grazing, and the development and maintenance of roads have been stopped. The need for this road area for dis-

tribution and hauling of water and preservation and grazing of sheep is a necessity for our operation in this area. Now, this is peripheral to the designated area. We believe totally in keeping this area in the multiple-use concept. In that area we also have mining interests, recreational interests who come out there, hunters, woodcutters, and people who just enjoy the peaks and, as it was brought out earlier, we can enjoy it without it being designated as a wilderness area. [Utah Wool Growers]

**9.24 RESPONSE:** Congress has determined that livestock grazing is to continue in designated wilderness areas. Rangeland improvement alternatives will be developed and evaluated through the environmental analysis process, including consultation with grazing permittees and other interested publics. Alternatives which utilize a practical and reasonable approach to meet rangeland and wilderness management objectives will be selected.

Permit modifications for the construction of new rangeland improvements or replacement of existing rangeland improvements will be made in accordance with BLM grazing regulations. Special consideration will be given to construction standards and techniques to achieve the most practical and reasonable approach considering the wilderness resource.

Also, see the responses to General Comments 1.2, 3.15, and 18.2, which discuss the multiple-use concept as it relates to wilderness designation and livestock grazing in wilderness areas.

**9.25 COMMENT:** In portions of eight allotments used by 14 permittees, AUMs are not clearly stated (determination only possible by calculation: total AUMs in WSA = 4,260). This represents a gross overallocation of grazing forage which, according to BLM, can support 50 AUMs for cattle and 3,022 AUMs for sheep. Lack of live water limits grazing potential. BLM suggested ways used by stockmen as why 23,000 acres are not recommended for inclusion, although no future range improvements are proposed. [Marvin Poulson]

**9.25 RESPONSE:** The Warm Springs RMP requires that BLM provide a balanced allocation of forage resources for livestock, big game, and wild horses, while ensuring the protection of rangeland values and providing a stable, renewable forage base. The RMP further states that needed adjustments be initiated within the next 5 years. This type of action will

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 9: NOTCH PEAK WSA (CONTINUED)

eliminate any over-allocation of grazing forage that may presently exist within the Notch Peak WSA. Adjustments in forage allocation could result with or without wilderness designation.

Forage allocation on Federal lands is based on forage production and availability to be harvested. There is very little live water on Federal lands, and much of the grazed range requires hauling water. Therefore, BLM does not consider the lack of live water as limiting grazing potential. Rather, inaccessibility of the area limits the potential use of forage. Wilderness designation would impose restrictions on water hauling because of constraints on the use of vehicles.

**9.26 COMMENT:** The predator control taking place in this area is another absolute necessity for a viable livestock operation. Without the proper predator control using all of the tools of aircraft, jaw traps, M-44s, and so forth, we would be eliminated from this use under the wilderness proposal. We cannot maintain predator control. We cannot maintain a viable livestock operation in that area without them. We have had an example in Utah this past winter with Mount Naomi in which flying for predator control was denied, first accepted, and then later denied by the pressure that was put on by the wilderness people. We, in the operation of sheep, cannot operate without adequate predator control. [Utah Wool Growers]

**9.26 RESPONSE:** Should the area be designated wilderness, predator control would be allowed to protect threatened or endangered wildlife species on a case-by-case basis to prevent special and serious losses of domestic livestock. Methods would be directed at eliminating the offending individuals, while at the same time presenting the least possible hazard to other animals or to wilderness visitors. The outcome of the FS case referred to in the comment is that predator control under the wilderness management restrictions will continue. The Final EIS notes that slight increases in livestock losses would result, but the affect would be slight because several methods of control could be utilized.

**9.27 COMMENT:** This area in itself meets the mandatory wilderness characteristics. BLM vastly under-rates recreation use of this area. BLM's estimated numbers of visitors in this area per year are too low. During hunting season, this number of visitors can be found in the area in one weekend. [Utah Wilderness Coalition]

**9.27 RESPONSE:** The number of visitor days attributed to recreational activities is an estimate based on the best information available. Because the comment does not provide additional data, the Final EIS estimates are based on the methodology explained in General Comment Response 21.5.

**9.28 COMMENT:** BLM claims 20 miles of ways lie within the eastern and southern portions of the WSA being deleted. In the inventory, BLM concluded that these ways were insignificant. In the initial inventory many miles of insignificant ways equal in physical appearance were also deleted. These ways are not noticeable to the wilderness user, and ORVs can be restricted. Out of an area containing more than 20,000 acres, these intrusions impact less than 15 acres. In almost all cases, these ways are nothing more than two-wheel paths which are difficult to see by a visitor off its path. They resemble two parallel trails. [Utah Wilderness Coalition]

**9.28 RESPONSE:** Some of the 20 miles of ways are only two-wheel tracks; however, many miles are well used by livestock operators, prospectors, and the general public.

**9.29 COMMENT:** The WSA is criss-crossed with jeep roads and there is no water supply nor great aesthetic values or grandeur to attract others. [Utah Wool Growers]

**9.29 RESPONSE:** The factors noted, such as road intrusions, water supply, and aesthetic qualities, were all discussed in the Final EIS. The Proposed Action and alternatives were based on these, along with other factors.

**9.30 COMMENT:** Screening is used to define solitude. This WSA is 15 miles by 9 miles, yet BLM claims that only 55 percent of the area has outstanding solitude. There are 40,900 acres having Class A or Class B scenic quality, and these areas should be given wilderness designation. [Owen Severance]

**9.30 RESPONSE:** Screening is only one consideration in determining opportunities for solitude. See the response to General Comment 3.1 which discusses BLM's wilderness inventory in Utah. Also, see the responses to General Comments 9.8, 22.3, and 22.5, which discuss inconsistencies and the methodology used for identifying and evaluating wilderness values.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 9: NOTCH PEAK WSA (CONTINUED)

It should be noted that scenic values are not a mandatory wilderness criteria, but are considered a special wilderness feature.

**9.31 COMMENT:** Curiously, BLM rates a portion of the area as lacking solitude, while saying elsewhere that ORVs could be easily managed because the ruggedness of the terrain provides a natural barrier to them. According to BLM, only 28,130 acres meet the Wilderness Act standards for primitive recreation. Twenty-three thousand acres (45 percent) of the foothill area ". . . offer little topographic or vegetation variety and, consequently, fail to offer outstanding recreational experiences." (See the comment under "Solitude" above.) BLM's position here is contradictory. [Marvin Poulson]

Special features: Notch Peak (3,000-foot cliffs, bristlecone pine trees). We could add rock climbing and sensitive plant species as additional special features.

**9.31 RESPONSE:** Naturalness and opportunities for solitude and primitive recreation were assessed according to criteria established in BLM's Wilderness Inventory Handbook and Wilderness Study Policy. See the response to General Comment 3.1. The wording in the EIS is ". . . little, if any, ORV play activity occurs in the area largely due to topographic constraints." The word "largely" indicates that, in certain areas, other factors play a role in the lack of ORV use. This is not contradictory to BLM's findings that the foothills offer little topographic variety.

The EIS states that rock-climbing opportunities are above average and that sensitive plant species inhabit the area.

**9.32 COMMENT:** Hiking and geologic sightseeing, backpacking, camping, horseback riding, and nature study, were rated excellent by BLM while photography was rated as average. On this point we must disagree. Photographic opportunities are excellent in much of the area because of the interesting views of canyons, vegetation (including many of the bristlecone pine trees), and Notch Peak from virtually any part of the WSA where it is visible. [Marvin Poulson]

**9.32 RESPONSE:** BLM believes that backpacking, camping, horseback riding, nature study, and photography are all rated about equal. Hiking and geologic sightseeing are rated higher in opportunities for recreational experience.

The reason photography was rated average is because it does not meet the criteria for outstanding as described in the Glossary in Volume I.

Stands of bristlecone pine are noted as a special feature, but are not considered an outstanding opportunity for photography for the public in general.

**9.33 COMMENT:** "Notch Peak itself is a distinctive landform and, therefore, could make a contribution to the diversity of landforms in the NWPS." The diversity of the NWPS would be increased by the addition of this area's many ecosystems and biotic communities whose diversity is unequalled in this region. [Utah Wilderness Coalition]

**9.33 RESPONSE:** BLM agrees that Notch Peak is an important landform, and the diversity of the ecosystems is a significant educational and scientific value. Notch Peak would be designated wilderness with BLM's Proposed Action. The Volume I analysis indicates that Notch Peak would add diversity to the NWPS, particularly in Utah.

**9.34 COMMENT:** WSA number 7 (Howell Peak) and 9 (Notch Peak): These two areas are separated by Rainbow Valley, a corridor for two existing 230-kV lines. This valley is also a major east-west corridor that has received interest from several utility companies. [Utah Power and Light]

In designating these WSAs as wilderness areas, existing transmission facilities, room for maintaining them, and the potential for a major transmission corridor must be protected.

**9.34 RESPONSE:** See the response to Specific Comment 7.18.

## SECTION 10

### KING TOP WSA

**10.1 COMMENT:** I have one difference of opinion with BLM on the designation of the King Top WSA. This is an area embracing 85,000 acres of land, including some 35,000 acres of flat benchland which we really do not have any flat wilderness area. I believe that must have been a mistake. I don't know why that was included in this King Top designation out in the west-central area of BLM. [Utah Wool Growers]



# SPECIFIC COMMENTS AND RESPONSES

## SECTION 10: KING TOP WSA (CONTINUED)

**10.1 RESPONSE:** The term flatland was used in the description of the lower elevation pastures of the WSA. The land is not perfectly flat; however, when compared to the higher steep portions of the WSA, it is relatively flat. The WSA boundaries were established during the inventory phase of the wilderness review. See General Comment Response 3.1 for comments on the wilderness inventory.

BLM's Proposed Action for the King Top WSA is the No Action/No Wilderness Alternative. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

**10.2 COMMENT:** BLM's Partial Wilderness Alternative is similar to the Utah Wilderness Association's proposal, but it is not recommended by BLM. Lack of screening is used to claim that only 59 percent of the 19 by 17-mile WSA has outstanding solitude. However, even with this incorrect definition of solitude, 50,000 acres meet wilderness standards. The Draft EIS contains an incomprehensible statement about primitive recreation: "Three activities (backpacking, dayhiking, and geological sightseeing) are average in quality due to the large size of the WSA, numerous canyons, and geologic features" (page 15). Are you trying to say big is bad and small is beautiful? Poor access and lack of water in the WSA will increase the solitude for those people willing to carry their own water by discouraging casual visits to the area. There are no significant conflicts, and 53,044 acres have Class B scenic quality. The Draft EIS isn't clear why this WSA did not receive a partial wilderness recommendation. The Utah Wilderness Association's Partial Wilderness Alternative should become BLM's recommendation. [Owen Severence]

**10.2 RESPONSE:** King Top WSA was identified as having 50,000 acres which provide outstanding solitude. Primitive and unconfined recreation opportunities are less than outstanding. Outstanding, as defined in the Final EIS Glossary, is "Standing out among others of its kind; conspicuous; prominent. Superior to others of its kind, distinguished; excellent."

The statement in the King Top WSA analysis, (Volume II, Page 15) may be misunderstood. It was meant to indicate that these activities (backpacking, dayhiking, and geological sightseeing) are considered average because of the large size, numerous canyons, and geologic features. Without these conditions, the three activities would be rated much lower than average. In other words, the large size of the WSA contributes to

the otherwise lower-than-average quality of these activities. This has been clarified in the Final EIS.

The Utah Wilderness Coalition's proposal is similar to the Partial Wilderness Alternative analyzed in the Final EIS. BLM's Proposed Action is the No Action/No Wilderness Alternative. The rationale for the Proposed Action are summarized in Appendix 11 in Volume I and consider scattered State sections that could affect manageability and the lack of outstanding opportunities for primitive and unconfined recreation.

**10.3 COMMENT:** BLM's analysis of this WSA has identified 53,000 acres of the central high-elevation portion of the King Top Mountains for a Partial Wilderness Alternative. This is precisely the area which contains the greatest wilderness values. Its summit is covered with huge parks. These grass-filled meadows with names such as Little Horse Haven are interspersed with stands of Douglas fir. Many large animal species inhabit this plateau. Included among these are deer, antelope, wild horses, and peregrine falcon. There are also many endangered bald eagles which can be found wintering here. [Colleen Dinsdale]

There are two sensitive plant species growing in the area, and Fossil Mountain is a unique scientific resource where one can find some of the best examples of Ordovician fossils anywhere in the world.

Climbing Stairs Canyon, whose sheer walls make an incredible drop to the valley floor, is one of the most spectacular canyons in the entire Great Basin. All of these features make this area one of the most outstanding and provide recreational opportunities and wilderness values. Its size and these numerous features of interest allow the WSA to meet every definition of wilderness.

**10.3 RESPONSE:** A Partial Wilderness Alternative for designating 53,044 acres was identified. Most of this acreage provides outstanding solitude. Recreation opportunities are considered less than outstanding by BLM. See Specific Comment Response 10.2.

**10.4 COMMENT:** Per page 19 (Volume I), the Proposed Action "includes all areas and acres currently judged by BLM to meet the test of suitability. Units may have low wilderness values but no identified conflicts with other resources." I basically agree with this criteria; however, I wish to comment on how the criteria were applied. [John Veranth]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 10: KING TOP WSA (CONTINUED)

There are many areas where the Draft EIS identifies no conflicts with other resources which were not proposed for wilderness. These areas lack significant human imprints and are manageable as wilderness; therefore, by BLM's own criteria, they should have been recommended. Specific examples include: the Cedar Mountain Range, large portions of the King Top WSA, the Cheesebox WSA, the south portion of the Scorpion WSA, much of Mt. Pennell, etc. These and additional areas were discussed in previous letters.

**10.4 RESPONSE:** See the responses to General Comments 3.5 and 3.14.

**10.5 COMMENT:** For an area with high wilderness values and no significant conflicts, the Wilderness Study Policy requires recommendation of suitable for designation. BLM is against wilderness in this area because other areas in this region are being recommended. We request a rationale be provided with an opportunity to comment on BLM's use of data and analysis methods to reach a conclusion. We are unable to see which factors were used and how they affected the final recommendation. We request the opportunity to comment on this rationale before the decision becomes final. [Utah Wilderness Coalition]

**10.5 RESPONSE:** The rationale for BLM's Proposed Action is summarized in Appendix 11 in Volume I.

In addition, BLM's rationale will be further documented in Wilderness Study Reports that will accompany the Final EIS when reviewed by the Secretary of the Interior, the President, and Congress.

Data supplied by the Final EIS and Wilderness Study Reports, including public comments, will be used by Congress in making final decisions on designation. There will be opportunity for comment on BLM's rationale before the final decisions are made.

**10.6 COMMENT:** We cannot understand the rationale for the no wilderness recommendation on the largest West Desert WSA. BLM notes wilderness values exist in the range and that resource conflicts are low to moderate. The area has an OIR of only 2 (low) and no producible quantities of oil and gas or other minerals have been found (SSA, Page 13). According to the rationale sheet sent to us by BLM, the area was found nonsuitable because of low wilderness values. (NOTE: This rationale sheet was prepared by BLM and sent to us at the first of the comment period when we learn-

ed of its existence. We were told it was prepared to give a brief explanation of why nonselected WSAs were excluded from the preferred alternative.) Even if the wilderness values in this area were low, which we believe they are not, this rationale still conflicts with the stated purpose of the Proposed Action found in Volume I, Page 30 which notes: "WSAs with no significant conflict with other resources were generally determined suitable, even if they had low wilderness values." Ironically, BLM's Partial Wilderness Alternative resolves all the "problems" and low quality wilderness identified by the agency. The SSA notes on Page 6 that: "The objective of this alternative is to identify and analyze as wilderness that portion of the WSA that has the most outstanding wilderness characteristics. The 53,004 acres analyzed as wilderness under this alternative include the central, high elevation portion of the WSA. The 31,726-acre flatland and foothill fringe areas within the WSA but outside the portion designated as wilderness contain all of the existing and proposed livestock developments and most of the existing ways . . ." [Utah Wilderness Association]

Contrary to BLM's finding, the lack of water does not diminish the area's recreational opportunities. This wilderness myth was laid to rest in BLM's own Wilderness Inventory Handbook and cannot be used to help justify a nonsuitability recommendation. Large parks, atypical in the Great Basin, are found with names like Horse and Little Horse Haven. In addition, the WSA is home to two sensitive plant species. There is no logical reason for not adopting the Partial Wilderness Alternative. It preserves the best and most outstanding wilderness, including unique features found nowhere else in the Great Basin, while eliminating any potential livestock conflicts and impacts. The analysis in the SSA shows this is the best alternative and meets the goals of the Proposed Action in the EIS.

**10.6 RESPONSE:** See General Comment Responses 8.5 and 8.6, which discuss suitability. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action. Also, see the response to General Comment 3.1. Please note that the development of the Proposed Action is part of the wilderness study phase rather than the inventory phase.

**10.7 COMMENT:** Many of the WSAs in the Great Basin region have been found unsuitable, despite their significance in fulfilling all of the qualifying criteria for wilderness designation. The EIS finds that WSAs

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 10: KING TOP WSA (CONTINUED)**

are not scenic, that wilderness character is not as significant as in other areas, and so on. Two observations seem relevant:[Mark Peterson]

1. Wilderness designation is not a process of elimination. Each WSA must be assessed on its own merits.

2. Highly subjective reasoning (e.g., defining an area as scenic or not scenic) must be limited in favor of more empirical measures. The key criteria are whether an area meets the standards prescribed in the Wilderness Act and whether significant resource conflicts exist. Accordingly, at least three WSAs should be found suitable for designation: Cedar Mountains, Conger Mountain, and King Top. All fulfill the essential criteria: outstanding opportunities for solitude and an absence of substantial human impacts.

In addition to fulfilling these qualifications, these areas possess significant natural resources, including wild horses, fossil-bearing rocks, and important wildlife habitat. All of these areas are suitable for designation, and should be recommended by BLM.

**10.7 RESPONSE:** See Specific Comment Response 2.9.

**10.8 COMMENT:** BLM concludes that ORV use in the benchlands presents a management problem. Now, this is not a problem even though BLM has made no effort to manage ORVs in this area. ORV users stick to existing vehicle routes. BLM makes the assumption that upon designation, "BLM will be given sufficient funding and personnel to effectively manage the area." This assumption is ignored in their conclusion. Management problems of ORVs are not specified. Simple inexpensive practices have proven effective in the past. BLM has verbally stated that there are almost no ORV management problems in the West Desert areas. [Utah Wilderness Coalition]

**10.8 RESPONSE:** The Final EIS acknowledges that most vehicle use is on the 30 miles of ways.

Also see the responses to General Comments 8.19 and 9.14, which discuss BLM's ability to control ORV use and ORVs as a manageability conflict.

**10.9 COMMENT:** The State generally concurs that the wilderness values for King Top WSA are not considered high within the region. Some conflicts exist with livestock operations, mineral and energy re-

source potential, and significant economic losses. The State has, however, recommended a 1,920-acre designation of Fossil Mountain as a historic site. This recommendation can be found in the State's comments on the Warm Springs Resource Area Draft RMP/EIS. [State of Utah]

**10.9 RESPONSE:** Fossil Mountain has been designated as a historic site area of critical environmental concern. However, since publication of the proposed Warm Springs RMP/Final EIS in 1986, BLM has issued new planning guidance regarding ACECs. In response to this new policy, notice has been placed in the Federal Register of BLM's proposal to also designate Fossil Mountain as an ACEC.

For the King Top WSA, BLM's Proposed Action is the No Action/No Wilderness Alternative.

**10.10 COMMENT:** The impacts of the many nonwilderness activities proposed by BLM are not assessed in a quantitative method. The absence of required comprehensive inventories of wilderness values further indicates an incompleteness of the wilderness study in this area. This critical factor in making wilderness recommendations needs to be completed. [Utah Wilderness Coalition]

The SSA carries the tone of being prepared to fit a predetermined decision. Consistently, wilderness values are not fully identified and, even when found, are underrated. Nonwilderness resources are exaggerated, often without specific objective data provided for support. This bias, easily seen, proves that the conclusion of unsuitability is not the product of a professional analysis.

BLM fails to provide any rationale for making a nonwilderness recommendation. The Draft EIS is sterile and does not offer much insight. The mineral conflicts are not significant. The only other area appears to be the District Manager's own criteria, a quota of the number and size of areas designated. Once this quota is exceeded, deletions are made.

**10.10 RESPONSE:** See the responses to General Comments 9.6, 13.1, 16.3, 20.2, and 22.1. Refer to Appendix 11 in Volume I for a summary of the BLM rationale for the Proposed Action.

**10.11 COMMENT:** Page 9, Geology: There is no mention of rock units by age or facies nor existence of intrusives or volcanics. It is difficult to

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 10: KING TOP WSA (CONTINUED)

characterize geology and economic potential from such data. [State of Utah]

**10.11 RESPONSE:** The Geology section has been revised in the Final EIS to provide a better description of the geology and geologic characteristics of the WSA.

**10.12 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should, therefore, be eliminated for consideration as a wilderness area. The following information is given for BLM consideration. [Utah International, Inc.]

Numerous roads and jeep trails criss-cross the area. The WSA has a limited historic production of lead, zinc, and silver. Moderate potential exists for future production of lead, zinc, silver, and gold in sedimentary rocks.

**10.12 RESPONSE:** BLM has reviewed and updated the minerals information used in the EIS. The review indicates that there is a low degree of certainty for small deposits of locatable minerals in the WSA. No economic development is projected for these minerals in the foreseeable future. There is a slightly higher degree of certainty for small deposits of oil and gas, although no development is projected in the foreseeable future.

See General Comment Responses 9.4, 9.10, 9.12, 15.1, and 15.5, which explain analysis assumptions and updating mineral information for the Final EIS.

**10.13 COMMENT:** BLM indicates ". . . the favorability for the occurrence of oil and gas is very high in the WSA." The SSA continues to state: "Recent drilling activity supports this favorability rating." No document or report in the SSA supports this conclusion. The presence of two dry exploration wells within the WSA contradicts BLM's analysis. Oil and gas interest centers on thrust belts. According to the "Mineral-Resource Evaluation of Wilderness Report" prepared for BLM in 1982, ". . . it is important to note only that tract 070 lies many miles west of the leading edge of the Sevier-aged thrusts." The report qualifies: ". . . the age of the thrusts in this area may be considerably older than thrusts along the leading edge of the belt farther east." This older age makes oil and gas occurrences less likely. Additional information in the report further reduces the possibility of finding

oil and gas, ". . . fresh-water (groundwater) flushing of the fractured bedrock and the Tertiary fill may be the rule rather than the exception over large parts of the Basin and Range province." The report concludes, "the favorability of tract 070 for oil and gas is considered to be low, and is assigned a value of f2." [Utah Wilderness Coalition]

The absence of objective data supporting the existence of oil and gas, coupled by the presence of information indicating the opposite, makes BLM's conclusion on oil and gas resource potential an unsupported opinion.

**10.13 RESPONSE:** See Specific Comment Response 10.12. Within King Top WSA, geologic favorability is high for small pools (f2). Because of drilling and information provided in the comment, a low degree of certainty (c2) has been assigned.

**10.14 COMMENT:** BLM cites the presence of pre-FLPMA leases as presenting a management problem. No map shows the location of these leases or their relationship to existing access in the area. Each lease may carry different surface management stipulations. The SSA needs to present the surface management required on each of these leases. Without this information, management problems cannot be identified. In some WSAs recommended for wilderness, pre-FLPMA leases are not described as a management problem. This inconsistency needs to be fully explained. [Utah Wilderness Coalition]

**10.14 RESPONSE:** The presence of pre-FLPMA leases in areas with no oil and gas potential would not present a manageability problem because no development would be expected. The presence of pre-FLPMA leases associated with known deposits of oil and gas would likely become a manageability problem. However, within the King Top WSA there is presently only one post-FLPMA lease that is not interpreted as a threat to manageability. Also, see the responses to Specific Comment 10.12 and General Comment 23.10.

**10.15 COMMENT:** Page 13, Locatable Minerals: Favorability for uranium may be low. The statement about surface volcanics (extrusives?) being source rocks is misleading. Apparently, what is meant is that there are no outcrops of intrusive source rocks. [State of Utah]

**10.15 RESPONSE:** The section referenced in the comment has been revised and clarified. Each

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 10: KING TOP WSA (CONTINUED)**

locatable mineral and the potential source rocks have been addressed separately.

**10.16 COMMENT:** The favorability for occurrence of uranium has been rated low by industry. Other locatable minerals (gold, silver, copper, lead, and zinc), while not rated, probably also have a low favorability of occurrence due to unfavorable geologic associations. [Utah Wilderness Coalition]

**10.16 RESPONSE:** The WSA does have geologic favorability for small deposits of many locatable minerals. See the response to Specific Comment 10.12.

**10.17 COMMENT:** As a livestock permittee in the King Top and Wah Wah Mountains area, we need all existing roads and the opportunity to build new ones to haul water to livestock and doctor and corral cattle when needed. Roads are also needed for fencing, stock ponds, maintenance, salting, spraying for insects, brush chaining, reseeding, and predator control. On the King Top and Wah Wah Mountains there is water that can be developed which is very vital for thousands of acres of grazing to livestock and wildlife. [Clark Bradshaw]

**10.17 RESPONSE:** BLM's Wilderness Management Policy on range improvements is summarized in Appendix 1, Parts A and B. In part it states: ". . . Structural Rangeland Improvements. Rangeland improvement alternatives will be developed and evaluated through the environmental analysis process, including consultation with grazing permittees and other interested public. Alternatives which utilize a practical and reasonable approach to meet rangeland and wilderness management objectives will be selected."

Permitted modifications for the construction of new rangeland improvements or replacement of existing rangeland improvements will be made in accordance with BLM grazing regulations. Special consideration will be given to construction standards and techniques to achieve the most practical and reasonable approach considering the wilderness resource. However, no rangeland developments are proposed for the area at present.

See Specific Comment Response 4.8 for a discussion on predator control in wilderness areas.

**10.18 COMMENT:** Page 15, Cultural Resources: More contextual information should be provided about the town of Ibex since the mining activities significantly impact the general area. [State of Utah]

**10.18 RESPONSE:** An extensive literature search was done for any mineral activity in the deserted town of Ibex. Ibex is not within a valuable mineral area, and no history of mining was found. Apparently, Ibex was a trading center, not a mining town. Because it is outside the boundary of the WSA, information on Ibex is not included in the Final EIS.

**10.19 COMMENT:** The King Top WSA embraces 85,000 acres. BLM estimates that 300 man-days is the amount of use made of that 85,000 acres. I believe that I know as much about it as whoever wrote up that particular report for the WSA and I would downgrade that number to 100 man-days. One-hundred people at one time or another spend a day in that WSA. It seems to me that's a low use of that WSA. How can you justify locking up 85,000 acres to be visited by 100 people for one day during a year's time? That just doesn't make sense to me. That's the only area that I'm intimately acquainted with, but I would guess that the other areas probably have about the same ratio of space acres and visitations by people. It looks extremely out of balance. The question that occurs to me is what is the problem? Again, I'm speaking only about King Top WSA because that's the only one I know intimately. It's available. There is no one there. If you have stamina enough and desire enough to carry a couple of gallons of water with you and whatever else you wanted to take, it's open to you and to anyone else. [Utah Wool Growers]

Since I was a boy, the only exception I know to this being absolutely undesignated but still a wilderness area is that an oil company was allowed by BLM to come in. They put a road into the middle of this area. They drilled according to their agreement with BLM, then withdrew. They re-seeded the road and blocked it off. You wouldn't know now that there had ever been a road there. So what's the problem? I suspect, too, that these other areas are there and available and they are wilderness. There are no roads and there are darn few people.

**10.19 RESPONSE:** See the response to General Comment 21.5 for a discussion of visitor use estimates. The response to General Comment 1.1 explains the purpose and need for wilderness. Appendix 11 in Volume I summarizes the rationale for the BLM

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 10: KING TOP WSA (CONTINUED)

Proposed Action, which is No Action/No Wilderness for the King Top WSA.

**10.20 COMMENT:** Its complex geology makes it a fascinating area to hike through. Alluvial fans add a sense of spaciousness, which BLM fails to recognize even in the Partial Wilderness Alternative presented. Lack of water does little to affect the quality of recreation and may even enhance it for some by offering a further challenge. Of course, water can be found throughout the winter and parts of the rest of the year, depending on the weather. Death Valley is drier and yet receives thousands of dayhikers and backpackers annually. Although only 2,000 acres have been identified as an "outstanding fossil" collecting area, it would be incorrect to assume that outstanding fossils would only be found on these 2,000 acres, only that they are more common here. Wilderness designation would protect outstanding fossils wherever they might exist. [Michael Van Note]

**10.20 RESPONSE:** Alluvial fans around King Top may add a sense of spaciousness. This factor was considered during the inventory phase. Some areas were not included in BLM's Proposed Action because of a number of factors besides spaciousness. The lack of water in this WSA, considering its location, size, and features, reduces the quality of outdoor experience for most people. Without water, there is less wildlife; therefore, hunting is not as good. Horseback riding is less attractive because horses need water. Even the average hiker would prefer an area with water over a dry area. Therefore, BLM concludes that the lack of water does detract from the recreational experience in the WSA.

Important paleontological values in the King Top WSA are protected by designation and management of the Fossil Mountain ACEC under the Warm Springs land use plan.

**10.21 COMMENT:** BLM fails to accurately assess the quality of hunting found in this huge WSA. This WSA provides year-round habitat for pronghorn antelope and chukar partridge and winter range for mule deer. In view of the few scattered areas being recommended for wilderness, habitat protection for one of Utah's nationally known outstanding hunting areas is being compromised. Wilderness offers the best protection for hunting. [Utah Wilderness Coalition]

**10.21 RESPONSE:** The King Top WSA does not receive any higher hunting use than other areas of the

West Desert. The WSA receives much lower deer hunting use than other nearby areas such as The Canyon and Pahvant Mountains. Wilderness designation would not necessarily result in better hunting.

The approved Warm Springs Resource Area RMP allows for habitat development and improvements for antelope, mule deer, desert bighorn sheep, and chuckars that may not be allowed within a wilderness area should this area be designated. Without artificial water catchments, the wildlife populations cannot significantly expand beyond their current population levels. Currently, the area does not support large huntable wildlife populations (Page 13 Volume II of the Draft EIS). Most of the antelope habitat within the WSA receives very little use, and the deer population is very small in comparison to the size of the area.

Also, predator control would not be allowed in a designated wilderness area unless it was to protect threatened or endangered species or for protection of domestic livestock (see Appendix 1, Volume I). In summary, wilderness designation would not ensure productive management for the big game species found in the King Top WSA.

**10.22 COMMENT:** It is the largest of the WSAs in the West Desert. In one area this unit offers the opportunity to preserve a unique, complete Great Basin ecosystem. [Utah Wilderness Coalition]

The overall quality of naturalness is high in the unintruded central portion of the WSA. The 20 miles of ways are found by BLM as insignificant human impacts. Most of these ways occur in the bottom of dry washes in hilly terrain. The infrequent stream flows quickly remove the evidence of use on these ways. Most of the WSA provides outstanding opportunities for solitude due to vegetative and topographic screening.

**10.22 RESPONSE:** King Top is the largest WSA in the West Desert and is made up of Great Basin ecosystems; however, these are similar to ecosystems in adjoining WSAs. Some of the ways noted are quite insignificant, although some are evident and are frequently used. Fifty-nine percent of the area is considered to provide outstanding opportunities for solitude. This information is presented in the EIS and was considered during development of BLM's Proposed Action.

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 10: KING TOP WSA (CONTINUED)

**10.23 COMMENT:** This mountain is the heart of the Confusion Range and, as such, represents an important geographical entity. BLM states that King Top is ". . . one of the world's most important collection areas for lower Ordovician fossils." Wilderness designation will protect this scientific resource, which is a valid reason for designation under the 1964 Wilderness Act. No conflicts with present or proposed mineral developments have been identified. The Draft EIS lists all mineral potentials as low to moderate. [Sierra Club, Cache Group]

We disagree with BLM's conclusion that "the overall quality of the recreational activities present is less than outstanding." The area has numerous outstanding opportunities for primitive recreation and solitude within a natural setting. In addition, the King Top area provides important habitat for wild horses, peregrine falcon, and antelope. What is the rationale for not recommending this area?

**10.23 RESPONSE:** The King Top WSA has within its boundaries an area identified as Fossil Mountain that has been reported as one of the world's most important collection areas for lower Ordovician fossils. Its uniqueness lies in the extremely heavy deposit of a vast variety of species. This site is recognized in the EIS as a special wilderness feature. This area is protected as a HS/ACEC under the Warm Springs Resource Area RMP.

Fifty-nine percent of the WSA is identified as having outstanding opportunities for solitude, but none of the area has outstanding recreational opportunities with the exception of Fossil Mountain (see the responses to Specific Comments 10.2 and 10.3).

Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action.

**10.24 COMMENT:** There is a communication site at the north edge of this WSA and access must be preserved for it. BLM's Proposed Action omits this WSA, and Utah Power and Light supports BLM's omission. [Utah Power and Light]

**10.24 RESPONSE:** The communication site and access road to the site are outside the King Top WSA and would not be affected by wilderness designation.

**10.25 COMMENT:** Page 6, Partial Wilderness Alternative: The fifth sentence in the paragraph under "A

summary of specific actions . . ." is incomplete and, therefore, incoherent. [Editorial comment]

**10.25 RESPONSE:** Page 6, Partial Wilderness Alternative. The fifth sentence beginning: "A summary of specific actions. . ." is deleted, and the beginning of the sixth sentence is modified. The two sentences now read, "The 31,726 acres not designated wilderness would be open to future mineral location, leasing, and sale. This area would be managed as oil and gas leasing Category 1 on about 31,426 acres and Category 3 on about 300 acres."

## SECTION 11

### WAH WAH MOUNTAINS WSA

**11.1 COMMENT:** The size of the initial roadless area was 84,000 acres. BLM made major deletions in the inventory to important West Desert wildlife habitat, most of which is completely natural. Mineral development areas of unknown potential were also deleted in the inventory, even though those areas met the mandatory wilderness criteria. These deletions, some of which violated the inventory policy, make the remaining WSA a partial WSA. [Utah Wilderness Coalition]

**11.1 RESPONSE:** See the response to General Comment 3.1, which discusses the inventory phase of the BLM wilderness review process.

**11.2 COMMENT:** BLM's Partial Wilderness Alternative has an unmanageable eastern boundary. The WSA has outstanding opportunities for both solitude and primitive recreation on 40,940 acres, and there are no significant mineral conflicts. The Utah Wilderness Association's proposal protects all of the wilderness values, in addition to providing a manageable boundary. [Owen Severance]

**11.2 RESPONSE:** It is recognized that natural boundaries are easier to locate and identify than boundaries formed by geographical coordinates. However, in the case of BLM's Proposed Action, the boundary coincides closely with the areas of higher relief containing the mandatory wilderness criteria.

See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action. The Utah Wilderness Association's alternative was considered but not analyzed in detail in the Final EIS.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 11: WAH WAH MOUNTAINS WSA (CONTINUED)**

**11.3 COMMENT:** Page 4, All Wilderness Alternative, Paragraph 1: An error in the WSA Exchange List (Volume I, Appendix 3) supplied by the State probably caused some confusion. Township 23 South, Range 16 West, Section 2 on the exchange list should be Township 25 South, Range 16 West, Section 2. That would make six State sections within or nearly surrounded by the WSA and three adjacent sections that would likely be exchanged. [State of Utah]

**11.3 RESPONSE:** The error in the Exchange List has been corrected. However, the State's policy on exchange has changed since publication of the Draft EIS and the "Exchange List" is now a list of State sections within WSAs. The Description of the Alternatives section for the Final EIS indicate that the State of Utah has not identified lands to be exchanged from wilderness areas.

**11.4 COMMENT:** BLM has dropped the Crystal Peak area from its proposal. This peak, on the Wah Wah's northern tip, provides a striking scene with its pure white and granite-like face and scattered Ponderosa pines. The outstanding natural features should justify wilderness designation here. It is difficult to understand why BLM does not want to include Crystal Peak in its proposal. [Sierra Club, Cache Group]

**11.4 RESPONSE:** BLM's recommendation of 36,382 acres includes Crystal Peak within the recommended area (see the Partial Wilderness Alternative for the Wah Wah Mountains WSA).

**11.5 COMMENT:** The State generally agrees as to the pristine quality of the Wah Wah Mountains WSA's wilderness characteristics. It is considered second for the wilderness quality in the region. Crystal Peak and bristlecone pine are special features. There are no known serious mineral conflicts. Impacts on grazing interests could be reduced by deleting the northern bench areas, namely Sand Pass north to Crystal Peak. The State supports designation of a 640-acre Crystal Peak ONA as well. Recommendations were included in the State's comments on the Warm Springs Resource Area Draft RMP/EIS. [State of Utah]

**11.5 RESPONSE:** BLM's Proposed Action for the Wah Wah Mountains WSA is to reduce the size to 36,382 acres; however, Crystal Peak is within the proposed wilderness area. Conflicts with grazing are not anticipated with BLM's Proposed Action. The comments for the Warm Springs Resource Area RMP were considered in that document.

**11.6 COMMENT:** Page 12, Geology: In addition to minimal references to "tertiary volcanism" and "Paleozoic rocks," there should be more information about rock units and ages, etc. [State of Utah]

**11.6 RESPONSE:** See the responses to General Comments 11.1 and 11.2. Additional information has been added to the Geology section, and this section has been renamed Geology and Topography.

**11.7 COMMENT:** I use the Grassy Cove, the Gray Hills, and the upper part of the Lawson Cove. If this is put into a designated wilderness area, it will completely destroy the rest of my operation because, after you get these things into wilderness, it's almost impossible to control the coyotes. We've got enough coyotes that my sheep will hardly go into some of these areas as it is now. Those old ewes are not as dumb as you think they are. If they are being killed, they know it. [Kenneth Porter]

**11.7 RESPONSE:** Predator control within designated wilderness areas would be allowed on a case-by-case basis to prevent special and serious losses of domestic livestock. Methods would be directed at eliminating the offending individuals, while at the same time presenting the least possible hazard to other animals or to wilderness visitors. Poison baits or cyanide guns would not be used. Also, see Appendix 1 in Volume I and the responses to General Comments 1.5, 3.27, and 16.10. The Final EIS acknowledges that livestock losses to predators would increase slightly.

**11.8 COMMENT:** As a livestock permittee in the King Top and Wah Wah Mountains area, we need all existing roads and the opportunity to build new ones to haul water to livestock and to doctor and corral cattle when needed. Also, fencing, stock ponds, maintenance, salting, spraying for insects, brush chaining, reseeding, and predator control are necessary. On the King Top and Wah Wah Mountains, there is an opportunity to develop water that is vital for thousands of acres of grazing for livestock and wildlife. [Clark Bradshaw]

**11.8 RESPONSE:** See the response to Specific Comment 10.17.

**11.9 COMMENT:** Now, I did not inherit my grazing rights, I had to pay for them. It cost me a lot of money for my summer and winter permits. If this area is put into a wilderness area, it would completely destroy my range operation, and I would lose my initial



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 11: WAH WAH MOUNTAINS WSA (CONTINUED)**

investment. I haven't seen anyone in BLM want to come out and hand over the dollars for losses to the existing users. [Kenneth Porter]

**11.9 RESPONSE:** The designation of a wilderness area will not affect existing grazing rights if grazing is continued in the same manner and degree. Also see the response to Specific Comment 11.7. The Final EIS analysis states that restrictions on access would be an inconvenience to livestock permittees.

**11.10 COMMENT:** To give you an idea of how many people go into this particular area, there have been some years when I left there in the spring, I could go back there in the fall, and I was the last track out. Last summer I left my water truck at my corral for 3 months and, when I got back to get it, there wasn't a drop of gas that had been taken. In comparison, I left it at Jericho overnight, and it was stripped. [Kenneth Porter]

**11.10 RESPONSE:** The number of visitor days attributed to recreational activities is an estimate based on the best information available. It is estimated that the WSA receives only 155 visitor days of use per year. BLM agrees that this is extremely light use.

**11.11 COMMENT:** BLM claims the area lacks solitude owing to military training flights fewer than those occurring over the Lone Peak Wilderness Area. BLM eliminates benches from the area because of an arbitrary solitude and recreation rating. The benches are important wildlife habitat. [Utah Wilderness Coalition]

**11.11 RESPONSE:** Under solitude in the Wilderness Values section, the air traffic over the WSA is identified and the last two sentences state that the air traffic can be an annoyance to visitors seeking solitude and detract from, but generally does not eliminate the overall opportunities for solitude in the WSA. Some of the benchland was not included in the Proposed Action since solitude and primitive recreation on these flats is less than outstanding. Lack of vegetation and landforms to provide screening were factors used in establishing WSA and Proposed Action boundaries. See Appendix 11 in Volume I and the responses to General Comments 3.1 and 16.1.

**11.12 COMMENT:** Each of the mandatory wilderness criteria is met in the Wah Wah Mountains, one of the most remote and natural of the West Desert ranges. To the many high quality wilderness activi-

ties BLM identified in this area, hunting needs to be added. The diversity of not just plant communities but landforms is correctly amplified and used to support the recommendation. [Utah Wilderness Coalition]

**11.12 RESPONSE:** Most of the WSA contains the mandatory wilderness values; however, about 1,200 acres west of Crystal Peak do not. Also, those areas not included in the Proposed Action have low wilderness values due to relatively flat topography and lack of vegetative screening.

Hunting opportunities are noted in the Recreation section (Page 16) as average to poor and were based upon a rating system used on all of the WSAs. The area does support a small resident deer herd of 20, with an additional 20 head migrating into the area during the winter. One of the factors used to rate hunting opportunities is the success of obtaining the game. With the large area involved and the very small number of deer or other game animals, the chances of success are minimal. BLM believes the average hunter would not consider this area as desirable for hunting.

**11.13 COMMENT:** The fascinating geology, fossils, diverse wildlife, and rugged terrain all add up to a wilderness par excellence. Again, I must take exception to the idea that a lack of water during some times of the year represents a serious degradation of recreational opportunity or experience. Unless one is planning to stay for many days it is possible to carry enough water in drier weather. It is a rare rock climb where water is available anyway, and rugged terrain is what a climber looks for. It seems that steep, rugged terrain might increase scenic sightseeing rather than decrease it. [Michael Van Note]

**11.13 RESPONSE:** The third paragraph under Recreation was written to show that the general opportunities for recreational experience are well below optimum and the lack of water is only one of the factors considered. Without water, there is less wildlife; therefore, hunting is not as good and horseback riding is less attractive because horses need water. Even the average hiker would prefer an area with water over a dry area. Therefore, BLM concludes that the lack of water does detract from the recreational experience in this WSA.

**11.14 COMMENT:** Page 17, Land Use Plans and Controls, Paragraph 1: To be consistent with the discussion on Page 4, the second sentence should read, ". . .

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 11: WAH WAH MOUNTAINS WSA (CONTINUED)**

State sections within or nearly surrounded by the WSA . . ." [State of Utah]

**11.14 RESPONSE:** The text has been revised to focus on in-held rather than adjacent lands.

**11.15 COMMENT:** Page 5, Map 2, and Page 8, Map 3: To be consistent with other maps in the document, Section 36, Township 25 South, Range 16 West should not be inside the WSA boundary (see map on Page 3). [State of Utah]

**11.15 RESPONSE:** The maps have been revised, and the indicated section is shown as outside the WSA.

**11.16 COMMENT:** The locatable minerals discussion in the Draft EIS is in error. Small beryllium, lead, zinc, and tungsten deposits are listed (Draft EIS pp. 10 and 13, Vol. III-A) as possibly occurring within the WSA. Our field investigation, conducted in October and November, 1985 (report in progress), found no evidence to suggest the presence of these commodities. No prospects were found, and no BLM personnel or local residents we contacted knew of any deposits or prospects occurring in the WSA. [Bureau of Mines]

The Draft EIS reports (p.14, Vol. IIIA) 62 mining claims in the WSA; claims aggregating 835 acres are reported near Crystal Peak. As of October 1985, records at the BLM State Office in Salt Lake City indicated fewer than 50 mining claims in the WSA. Claims near Crystal Creek aggregated approximately 250 acres.

**11.16 RESPONSE:** Based on SAI (1982), Bullock (1981), BLM (1987), and Brown (1987), the Final EIS reports the possibility of occurrence of the listed minerals; however, the certainty of occurrences is low to very low.

The number of mining claims varies continuously because claims can be located up to the time of designation. At the time of preparation of the Final EIS, there were 30 mining claims in the WSA covering approximately 600 acres.

**SECTION 12**  
**COUGAR CANYON WSA**

**12.1 COMMENT:** Page 1, Vegetation, Introduction, Paragraph 1, Last Sentence: Is this statement true for both Utah and Nevada? [State of Utah]

**12.1 RESPONSE:** According to BLM records, the statement is accurate. There are no in-held State or private lands in the WSA.

**12.2 COMMENT:** This WSA has a strange history. It was recommended for further study in the draft and final initial wilderness inventory, was missing from both the draft and final intensive wilderness inventory documents, then reappeared in SSA form. What happened? [Owen Severance]

**12.2 RESPONSE:** Cougar Canyon WSA was considered under an accelerated inventory process along with other units that were in the overthrust belt. The initial and final decisions on these were published in September 1979 and April 1980.

**12.3 COMMENT:** Too much emphasis was placed on screening as a requirement for solitude. The statement that only 400 acres offer outstanding opportunities for primitive and unconfined recreation is ridiculous. The SSA states that "similar opportunities are found in the near vicinity." Since those areas will not be designated as wilderness, they won't receive protection in the future and shouldn't be considered as a reason to refuse wilderness designation for the Cougar Canyon WSA. The conflicts in this WSA are minimal, and its location adjacent to Beaver Dam State Park is an additional reason for wilderness designation. [Owen Severance]

**12.3 RESPONSE:** Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action. A Partial Wilderness Alternative is included in the Final EIS and is BLM's Proposed Action.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 12: COUGAR CANYON WSA (CONTINUED)

**12.4 COMMENT:** BLM trips over itself in contradictions to degrade the wilderness assessment. First, BLM finds the area is too rugged for recreation. The challenge is so great that BLM falsely claims that this limits opportunities for wilderness-type activities. By what criteria does BLM judge an area too rugged for wilderness?

The description talks about steep canyons, peaks, long ridges, and rough drainages. The Draft EIS points out: "Slopes are rolling to very steep (5 to 65 percent or more). Much of the WSA is exposed rock outcrop." This, of course, adds to the wild character, increasing the quality of wilderness activities. BLM then reverses itself while describing solitude. [Utah Wilderness Coalition]

**12.4 RESPONSE:** No mention of the WSA being too rugged for wilderness is found in the Draft or Final EIS. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action.

**12.5 COMMENT:** The Draft EIS continues to make false statements about the topography of the area by stating that the headwaters of Wash-Barn Pole Hollow is a wide and open canyon system that offers few opportunities for solitude. This is false. The topography of these canyons is rugged and twisting. The canyon walls, where not rugged outcrops, are covered with dense pine. The screening makes it impossible to be aware of a person 100 feet away throughout the canyon. [Utah Wilderness Coalition]

BLM also says that Cougar Canyon is not entrenched and exhibits little topographic or vegetative screening. Again, this is false. The vegetative screening of the undulating terrain makes it difficult to see another person a few hundred feet away. A person in Cougar Canyon cannot see a person on most of the ridges and in any of the other eight canyons.

BLM indicates that Sheep Canyon and the unnamed canyon immediately to the north exhibit some of the natural screening attributes, but neither canyon possesses them to the degree sufficient to provide outstanding opportunities. Here is one of the best examples of the abuse BLM uses to assess wilderness characteristics. Unsupported by fact and inconsistent with other assessments, BLM arbitrarily downrates wilderness values to justify an unsupportable recommendation. Solitude can be found to a degree in designated wilderness in this area.

**12.5 RESPONSE:** The introduction to the Cougar Canyon analysis notes that "Portions of the WSA are characterized by steep mountainous canyons, long ridges, and rough drainages." The comment takes the statements out of context and reports them to be inconsistent. The features of the various areas and canyons within the WSA are variable, and the text of the EIS does report that some areas are flat and open while others are rugged and steep. The Proposed Action in the Final EIS is a Partial Wilderness Alternative that was not analyzed in the Draft EIS. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

**12.6 COMMENT:** It is interesting to note that adjacent FS land was considered for wilderness designation during the RARE II process but was not proposed due to its small size and limited opportunities for recreation. This, of course, was before BLM was required to evaluate roadless areas for wilderness character. It would seem that these two roadless areas should be evaluated together since they represent together some very nice roadless country with enough space for solitude and enough interesting spots to visit and things to do to keep any wilderness enthusiast happy. [Michael Van Note]

**12.6 RESPONSE:** In 1984 Congress determined that the adjoining FS land was not suitable for wilderness designation and the area was released from wilderness study. Cougar Canyon was a WSA at that time, and the complementary wilderness values were known. According to BLM's Wilderness Study Policy, Chapter III, G. Joint Studies (USDI, BLM, 1982b), only adjacent land being considered for wilderness designation will be studied; therefore, inclusion of FS land with the Cougar Canyon WSA is not presented as an alternative in the Final EIS. However, the management objectives of the FS for lands adjacent to the WSA are discussed in the Final EIS.

**12.7 COMMENT:** BLM's analysis of the Cougar Canyon WSA suffers greatly from many of the biases present throughout the wilderness review. BLM parcels out the WSA into the "too rugged," "too open," and "just right" categories. BLM seems to be scrambling for a reason to drop Cougar Canyon when one does not exist. The potential for oil, gas, and minerals is low. BLM states on Page 12: "The entire WSA is open to ORV use but the rough terrain limits such use." Also, on Page 12, Cougar Canyon: ". . . is not entrenched and exhibits little topographic or vegetative screening." While on Page 8: "Sheep Corral,

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 12: COUGAR CANYON WSA (CONTINUED)

Sheep, and Cougar Canyons have extremely narrow and dense riparian zones and are practically inaccessible." The Cougar Canyon analysis is riddled with these inconsistencies. [Dean Petaja]

If BLM looked at the unit as a whole, I think the recommendation would be different. How can a 15,000-acre area with seven perennial streams, numerous canyons and ridges, beaver, deer, and cougar, not qualify for wilderness? In 1984, I took a 2-day trip in the Cougar Canyon WSA. I was astonished at the size of Pine Creek and the numerous beaver dams we had to work our way around. One of the people I was with was a range scientist, and he pointed out the highly unusual community of plant species present from the Colorado Plateau, the Great Basin, and the Mojave Desert provinces.

**12.7 RESPONSE:** Some confusion in the analysis arises because of references to various portions of the WSA. The text has been revised to clarify the descriptions of the different areas within the WSA. Outstanding opportunities for solitude are found in areas where topographic and vegetative screening provide a visitor with a feeling of seclusion. In much of the Cougar Canyon WSA, vegetation is sparse and topography does not provide screening. BLM believes that outstanding opportunities for solitude are found on only 1,300 acres of the WSA. See Appendix 11 in Volume I for a summary of the rationale for the BLM proposed Partial Wilderness Alternative. Also, see the responses to Specific Comments 12.3 and 12.4.

**12.8 COMMENT:** The unsuitable recommendation for Cougar Canyon is not consistent with the Proposed Action as it generally includes areas with little or no resource conflicts. The area has an OIR rating of 1+, as low as possible, and is included in the Manageability Alternative. The area harbors five live streams, a fishery, mule deer, and a healthy population of mountain lion. It harbors unique and likely endangered plant species and provides excellent opportunities for photography and bird watching due to the riparian systems in the area. It has few or no conflicts, and it should be recommended as wilderness. The write-up reveals a very real lack of knowledge of the region and is simple antiwilderness bias. For years, BLM refused to even take this area beyond the initial inventory phase even though it is unique. Now, rather than recognizing the region for its values, BLM makes a no wilderness recommendation. [Utah Wilderness Association]

**12.8 RESPONSE:** The characteristics of the WSA mentioned in the comment are discussed in the EIS. In response to public comment and based on reanalysis of the WSA, BLM's Proposed Action is a Partial Wilderness Alternative. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action. Also, see the response to Specific Comment 12.3.

The OIR was determined confusing and is not included in the Final EIS. See the response to General Comment 15.7.

**12.9 COMMENT:** Compared with other WSAs in the region, Cougar Canyon WSA possesses moderate to low quality wilderness values and low conflicts. However, there are high-value scenery and special features in the WSA. Recreational and wildlife values would benefit from wilderness protection. There are some conflicts with livestock, management of the nearby Nevada State park, and potential water resource development. [State of Utah]

**12.9 RESPONSE:** BLM's analysis indicates that livestock grazing would continue and springs could be developed with wilderness protection stipulations. There is little visitor use of the WSA from the adjacent State park. Therefore, there would not be significant conflicts between wilderness management and other resources.

**12.10 COMMENT:** Page 8, Geology: There is no discussion of geologic structure or unique geologic features; this is a geographic rather than a geologic description. [Composite comment]

**12.10 RESPONSE:** See the responses to General Comments 11.1 and 11.2. The Geology section has been revised and renamed Geology and Topography.

**12.11 COMMENT:** Page 10, Locatable Minerals: The possibility for bulk tonnage gold, either in volcanics or in the intrusives, should not be discounted. [Unidentified]

**12.11 RESPONSE:** Additional data on the potential for gold in the WSA have been included in the Final EIS. There is a low certainty (c2) for small deposits (f2) of iron with associated silver and gold in the WSA.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 12: COUGAR CANYON WSA (CONTINUED)**

**12.12 COMMENT:** Page 10: Leasable and locatable minerals are discussed, but salables are omitted. [Agency comment]

**12.12 RESPONSE:** Salable minerals were not discussed for this WSA in the Draft EIS because it has no known significant salable mineral resources.

However, for the sake of clarity and to provide a record for cumulative impact analysis, a statement has been added in the Final EIS to explain that salable resources are not a significant issue for the Cougar Canyon WSA.

**12.13 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should, therefore, be eliminated from consideration as a wilderness area. The following information is given for BLM's consideration: [Utah International, Inc.]

The WSA has limited historic production of lead, zinc, silver, copper and gold.

Roads and jeep trails criss-cross the area with scattered buildings, mines, and old prospected areas.

The WSA has moderate to high potential for future production of gold, silver, copper, molybdenum, beryllium, and clays.

**12.13 RESPONSE:** Mining activities and structures occur in the vicinity of the WSA, but no mining roads or structures are found within the WSA. BLM has reviewed and updated the mineral information for the Final EIS. The review indicates that there is a low degree of certainty for small deposits of various locatable minerals within the WSA. However, BLM does not project any economic development of minerals in the WSA in the foreseeable future.

Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5, which discuss analysis assumptions and updating of mineral information for the Final EIS.

**12.14 COMMENT:** The golden eagle is not explicitly noted as a sensitive species present in this WSA. [Scott Mills]

**12.14 RESPONSE:** The golden eagle is a FWS candidate species and is protected by the Bald and Golden

Eagle Act. It is a sensitive species and has been identified as such in the Final EIS.

**12.15 COMMENT:** The Draft EIS states that the "vegetative condition in terms of livestock forage ranges from fair to poor" (Draft EIS, Volume III-A, Page 8), yet three spring developments for livestock are planned for the area. This does not make sense. [Jean Soko]

**12.15 RESPONSE:** The three springs proposed for development are presently used by livestock. Development of the springs will not affect the level of livestock use but will make it possible for other resource uses of the water. It should be noted that livestock forage condition ratings gauge the usefulness of forage to livestock, but do not reflect the general vigor or ecological condition of the vegetation. The PNV type for the WSA is pinyon-juniper. Pinyon and juniper are poor forage plants for livestock.

**12.16 COMMENT:** The Draft EIS states that the WSA contains visual quality common to southern Utah. Then it turns around and states that this does not meet the wilderness 2c criteria. The 2c criteria does not say anything about visual or scenic quality having to be present, only that it may be considered as a supplemental value. This is a completely wrong use of the wilderness criteria and must be corrected. Visual quality Class A scenery, by definition in the VRM handbook, is outstanding or unique. To say that Class A visual quality is common to southern Utah and is, therefore, not interesting or outstanding is in error. It simply means that southern Utah is visually outstanding. Class A scenery is found wherever it exists and should not be rated otherwise just because it is "common" to a particular region. [Utah Wilderness Association]

**12.16 RESPONSE:** There are no specific standards for scenic quality in the Wilderness Act. The evaluation of an area's special features in the wilderness inventory was based on an assessment of the estimated abundance or importance of a value to the area. However, the text has been revised to recognize Class A scenery as a special feature if the estimated abundance or importance of the value to the area is not taken into consideration.

**12.17 COMMENT:** The Draft EIS says the scenery is ordinary and commonplace--no mention is made of the large areas of bright white volcanic ash, decidedly not common. The locations of developed access

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 12: COUGAR CANYON WSA (CONTINUED)

points and campgrounds at Beaver Dam State Park in Nevada and Pine Park, Dixie National Forest in Utah, add to recreation potential. The area is described as not affording opportunities for solitude, but as being too rugged to get horses in! Is Cougar Canyon considered too rugged and rough to be wilderness? [Kim Clegg]

**12.17 RESPONSE:** See the responses to Specific Comments 12.4 and 12.16.

**12.18 COMMENT:** Cougar Canyon meets all of the mandatory criteria for wilderness such as size, naturalness, and outstanding opportunities for solitude or primitive recreation. It also has some prime riparian habitat and a good population of cougars. [Alan Miller]

In Volume I, Page 94, BLM finds cougars as quote: "of special features. An important value that contributes to wilderness." Yet, in an absolute contradiction, BLM then goes on to state in Volume III or to claim that Cougar Canyon lacks any special features, even while stating that cougars use the canyon extensively. Now the logic of that squeaks of philosophical nonsense.

**12.18 RESPONSE:** The mandatory characteristics are found only in certain areas within the WSA. In the wilderness inventory, the presence of cougar in the WSA was not considered to be a special feature because they were not considered particularly abundant or important to the area. In southwestern Utah, cougars are found in most remote areas. However, the text has been revised to recognize cougar as a special feature in this WSA if the estimated importance of the value to the area is not taken into consideration.

**12.19 COMMENT:** BLM ignores the importance of supplemental values in determining wilderness values. This is one of the few BLM areas in the State that has Class I trout fishing streams. BLM claims that the supplemental values do not contribute to educational, scenic, historic, or scientific values. Again, this conclusion is unsupported and conflicts with the BLM record. [Utah Wilderness Coalition]

**12.19 RESPONSE:** Evaluation of the area's special features in the wilderness inventory was based on the estimated abundance or importance of a value to the area. None of the streams in the WSA have been classified trout fishing streams and were not considered special features. However, the text has been re-

vised to recognize perennial streams as special features in the WSA if their estimated importance to the area is not taken into consideration.

**12.20 COMMENT:** Solitude is not so hard to find as BLM would indicate in a place with nearly "inaccessible," "dense" riparian zones, and too "steep" and "rough" for even half of it to be suitable for grazing. This WSA is important because of its ecological values also. It is situated in a transition area in terms of geography and elevation. The result of this, coupled with its rich riparian habitat, has been a wide diversity of plant and animal species within a relatively small area. It is no wonder that so many game animals are found here, that cougar frequent the area, or that "environmentalists" would find it so interesting. It represents a well-balanced ecosystem which has been little influenced by man (the lack of grazing in much of this area has no doubt helped this). Again, this area should be included in the BLM wilderness proposal with recommendations for reevaluation of the adjacent FS roadless areas. [Michael Van Note]

**12.20 RESPONSE:** See the responses to Specific Comments 12.3 and 12.6.

**12.21 COMMENT:** The Draft EIS states: "There are no known ecological, geological, scientific, educational, or historical values in the WSA," then says the area is used for nature studies and contains a candidate species for threatened and endangered status (Epilobium nevadense). Aren't these of ecological or scientific value? In fact, the five perennial streams, which contain healthy and active fisheries, are rather unique from an ecological perspective, given they are found in a region as arid as any in the United States. [Utah Wilderness Association]

**12.21 RESPONSE:** The text has been revised to include special status species as special features. Also, see the responses to Specific Comments 12.16, 12.18, and 13.1. Epilobium nevadense is not a candidate species (50 CFR, Part 17). The text has been corrected in the Final EIS.

**12.22 COMMENT:** This interpretation of the Wilderness Act is highly imaginative and the logic which follows is flawed. Section 2(c) of the Wilderness Act states, ". . . (4) may also contain . . . scenic . . . value." The more than 5,000 acres of Class A scenery in Cougar Canyon WSA is, by definition, "unusual or outstanding." If, as stated, the scenery is not unusual, then it must be outstanding. Therefore it must have

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 12: COUGAR CANYON WSA (CONTINUED)**

scenic value, as does all other Class A scenery. Furthermore, if the argument is accepted that any scenery which exists in more than one place (square foot? acre? section? WSA?) in Southern Utah or Nevada is not unusual, then it might be possible to state there is not unusual scenery in Southern Utah, which is patently false. A broader perspective would be appropriate here. [Utah Wilderness Coalition, et al.]

**12.22 RESPONSE:** See the response to Specific Comment 12.6.

**SECTION 13**  
**RED MOUNTAIN WSA**

**13.1 COMMENT:** Rising 1,400 feet above the benches, this imposing brilliant red mountain is capped with pinyon pine. BLM only considered one activity in the many found in the WSA. It possesses the same rugged slickrock terrain that is characteristic of the ISA. The western part of the southern parcel is covered with a juniper forest and has grasslands important for wildlife. This WSA is an important component of the whole ecosystem in this area and needs to be retained in the study process. BLM incorrectly chose to place the boundary on section lines up to 1 mile from the last human impact. The inventory policy requires that all natural areas be included for study. [Utah Wilderness Coalition]

We request a complete set of documentation on the wilderness inventory showing BLM's data and conclusions on the character of this area. BLM is requested to remove the invalid rating system on solitude and recreation from the study process.

**13.1 RESPONSE:** See the responses to General Comments 3.1, 8.11, and 22.5. Red Mountain is a WSA rather than an ISA.

**13.2 COMMENT:** BLM's proposal unnecessarily leaves out the "spectacular red cliffs paralleling old Highway 91" (WSA, Page 8). [Owen Severance]

**13.2 RESPONSE:** BLM's proposed Partial Wilderness Alternative includes the red cliffs along the southern boundary of the WSA.

**13.3 COMMENT:** We endorse the Utah Wilderness Coalition's 18,000-acre proposal for this area; this

involves most of the 18,250-acre WSA. BLM's 17,450-acre recommendation is very good and BLM should be commended for it, but there are a few additional acres that need protection. [Sierra Club, Cache Group]

Please consider the following regarding Red Mountain: This area has been a popular hunting, backpacking, and horse riding area for many years. Wilderness designation as proposed by the Utah Wilderness Coalition will best protect this area, which is extensively used by St. George area residents year-round.

By designating this area as wilderness, the entire Snow Canyon State Park and Gunlock State Beach will be complemented through integral protection.

BLM should remember that many people voiced their concerns when this area was dropped in 1984.

**13.3 RESPONSE:** Contrary to the opinion expressed in the comment, BLM estimates that recreational use of the area is light, probably less than 500 visitor days per year. About 80 percent of this use comes from recreationists who use motorbikes or jeeps for access to the end of a trail on the northeast side of the WSA. Little use occurs in the WSA from June to November because of the scarcity of drinkable water, extreme summer temperatures, and the presence of sand flies.

There are no established access routes from Gunlock State Beach or Snow Canyon State Park into the WSA. Wilderness designation of the WSA would not complement management of Gunlock State Beach, since use of the beach is for water-based activities. Protection of the WSA from surface-disturbing activities would protect visual resources and complement sightseeing activities in the vicinity of Snow Canyon State Park.

**13.4 COMMENT:** It is interesting to note that the Draft EIS, while coming to the same conclusions as presented in the SSA (in most cases), leaves out a lot of the damning information that was included in the WSA. As a result, the Draft EIS is misleading because it doesn't state a lot of the reasons that could be used against adopting BLM's Proposed Action. For example, in the Red Mountain WSA, the Draft EIS doesn't include the information from the SSA that BLM's Proposed Action leaves out the "spectacular Red Cliffs paralleling old Highway 91" (WSA, Page 8). Another

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 13: RED MOUNTAIN WSA (CONTINUED)**

instance is the Moquith Mountain WSA where the Proposed Action is the No Action Alternative. The Draft EIS doesn't say that: "BLM's planning efforts have identified portions of the WSA as suitable for intensive recreation development" (WSA, Page 4). These are typical omissions that prejudice the Draft EIS in favor of BLM's Proposed Action. The Final EIS should be more objective, but I am not optimistic that it will be. [Owen Severance]

**13.4 RESPONSE:** The analysis and preliminary suitability recommendation found in BLM's SSA for the Red Mountain WSA were revised during preparation of the Draft EIS. In the case of Red Mountain, the preliminary suitability recommendation was that the entire WSA was unsuitable for wilderness, including the red cliffs referred to in the comment. BLM's Proposed Action in the Draft EIS was a Partial Wilderness Alternative of 17,450 acres, which included the red cliffs inside the proposed wilderness area. The Proposed Action in the Final EIS is a 12,842-acre Partial Wilderness Alternative, which still includes the red cliffs in the proposed wilderness area. No resource information found in the WSA was left out of the Draft EIS; however, analyses were revised and updated, and the Proposed Action was changed.

**13.5 COMMENT:** Page 10, Geology: There is no discussion of the limestone, conglomerate, or basalt formations found in the WSA. [Agency comment]

**13.5 RESPONSE:** See the responses to General Comments 11.1 and 11.2. The Geology section has been revised to include information on the rock types exposed within the WSA.

**13.6 COMMENT:** Page 13: Although this aquifer is presently closed to water right appropriations, the possibility exists that future growth of St. George and other surrounding communities may necessitate reopening of negotiations for water right applications to supply needed culinary water. Wilderness designation could greatly preclude potential use of the aquifer as a municipal water source for expanding communities in Washington County. [Kurt Young]

**13.6 RESPONSE:** The Navajo sandstone aquifer that underlies the Red Mountain WSA is extensive and can be accessed from outside the WSA. Therefore, it is not considered an issue.

**13.7 COMMENT:** The Red Mountain WSA possesses moderate wilderness values and low conflicts with

other land uses, except for a moderate potential for oil and gas resources and aquifer development. The recommended 17,450-acre Partial Wilderness Alternative mitigates potential conflicts with nearby communities and possible future developments or community expansion plans. [State of Utah]

**13.7 RESPONSE:** The information presented in the comment is included in the EIS and was considered during development of BLM's Proposed Action.

**13.8 COMMENT:** Page 7, Proposed Action: The proviso statement concerning validity of mining claims on the 800-acre area not designated wilderness implies that validity examinations will be conducted on mining claims in this area. To prevent misinterpretation, drop the words "if claims are valid" from this statement. [Agency comment]

**13.8 RESPONSE:** Disturbance estimates have been revised and the statement referred to in the comment is not included in the Final EIS.

**13.9 COMMENT:** Anyone that has been on the top of Red Mountain will agree the view is spectacular. It is certainly a place of quiet beauty. Should this be restricted to the very few who are able to climb the steep terrain that surrounds this place, many beautiful areas would be cut off from at least 70 percent of our population with the proposed wilderness plan. [Southern Nevada Land Cruisers]

The wilderness Alternate Plans 1 and 2 have no cherry-stemming; in fact, the only way to the top is cut off in all plans.

We are requesting a reevaluation of these areas to allow use of a road or way in that area since over half of the members in our four-wheel drive club are unable to hike distances. Our club is dedicated to the preservation of the flora and fauna in the wilds. We use established roads or ways only, and we do not tear up hills or create new ways.

**13.9 RESPONSE:** The use of the 5 miles of way in the WSA by ORV clubs has been noted in the Final EIS. BLM's Proposed Action presented in the Final EIS would close only 1 mile of way, rather than the 4 miles that would have been closed with the Proposed Action in the Draft EIS.

**13.10 COMMENT:** A BLM assessment of development at Santa Clara is very optimistic. A few houses



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 13: RED MOUNTAIN WSA (CONTINUED)**

scattered along the road from Snow Canyon hardly present a threat to the resource. Even the Washington County Master Plan recommends that the area remain open space. The Draft EIS states that "Much of the county's economy is based on the tourism industry." I submit that the reason the tourists come is the wild, scenic beauty of this land. That beauty will be harmed by selling the 800 acres for residential development for which there was little evidence of demand during my travels in this area last spring. I would, however, agree that the Partial Wilderness Alternative makes topographic sense. The cliffline border would be much simpler to define. Yet, I still would prefer the whole area be recommended. Red Mountain, particularly when considered in combination with Snow Canyon State Park, is a superb wild land and should be preserved as wilderness. [Jean Soko]

**13.10 RESPONSE:** The area near Ivins and Santa Clara has no physical barriers to vehicles or other use and would be difficult to manage as wilderness. Therefore, BLM's Proposed Action is to place the proposed wilderness boundary along the cliffs to avoid manageability conflicts.

Also, see Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

**13.11 COMMENT:** Page 15, Wildlife: The UDWR's Southern Region has proposed to the Dixie Resource Area BLM Office stocking desert bighorn sheep on Red Mountain. The action is still proposed but not mentioned in the Draft EIS. [State of Utah]

**13.11 RESPONSE:** The information provided in the comment has been included in the Final EIS.

**SECTION 14**  
**COTTONWOOD CANYON WSA**

**14.1 COMMENT:** This unit was in the accelerated IPP wilderness review and originally had 16,923 acres. IPP would have placed a powerline on the western portion of the unit. This portion was dropped when developing the WSA. This action occurred before Organic Act Detective (OAD) 78-61, Change 2, which required boundaries to abut man-made intrusions. [Utah Wilderness Coalition]

**14.1 RESPONSE:** See the response to General Comment 3.1.

**14.2 COMMENT:** This area abuts approximately 7,000 acres of roadless land managed by the FS. To assess the wilderness issue comprehensively, these lands also need to be considered. BLM should recommend designation of all of the area as wilderness and include the FS plan for a joint wilderness area. [Utah Wilderness Coalition]

**14.2 RESPONSE:** In 1984, Congress determined that the adjoining FS land was not suitable for wilderness designation, and that area was released from wilderness study. Cottonwood Canyon was a WSA at that time, and the complementary wilderness values were known. According to BLM's Wilderness Study Policy, Chapter III, G. Joint Studies (USDI BLM, 1982b), only adjacent land being considered for wilderness designation will be studied; therefore, inclusion of FS land with the Cottonwood Canyon WSA is not presented as an alternative in the Final EIS. However, the management objectives of the FS for lands adjacent to the WSA are discussed in the EIS.

**14.3 COMMENT:** BLM has decided to allow the intrusion of a municipal water well, despite vigorous local opposition. This intrusion proves that water development is the sole reason why only the Partial Wilderness Alternative is proposed. BLM's local office in St. George consistently failed to reply to my own comments about the intrusion. [M.P. Cohen]

**14.3 RESPONSE:** The intrusion referred to in the comment was allowed under a temporary right-of-way and is in compliance with IMP guidelines. The right-of-way will expire on December 31, 1989, and will not affect the Secretary of the Interior's wilderness recommendations.

**14.4 COMMENT:** BLM recently granted the city of St. George a temporary right-of-way for a culinary well in this WSA. The right-of-way will expire on December 31, 1989, or prior to this date if Congress acts to designate or release this area. The Draft EIS states in Volume III, Part A of the Partial Wilderness Alternative, which is the Proposed Action, that 14,077 acres of the wilderness would be deleted to allow water development in this area without wilderness conflicts. Since I did join BLM and the city on a field trip to the well site, I believe that it is not necessary to delete the entire 14,077 acres to develop water in Cottonwood Canyon. I am not opposed to the present temporary water permit granted to the city, but I know that the recommended deleted acreage in

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 14: COTTONWOOD CANYON WSA (CONTINUED)

Cottonwood Canyon is excessive for potential water development.

I would like BLM to reconsider this area and review a partial recommendation that would include the slickrock domes above Cottonwood drainage. [Del Smith]

**14.4 RESPONSE:** The Partial Wilderness Alternative was designed to eliminate conflicts with future water development. The areas outside the Proposed Action are accessible and are located on the southern boundary of the WSA in close proximity to municipalities. Therefore, they offer ideal locations for water development (see Appendix 11 in Volume I).

The need for this water to meet water demand in the St. George area has been identified by the city of St. George and the Washington County Water Conservancy District.

**14.5 COMMENT:** We thank BLM for its 9,853-acre wilderness proposal for Cottonwood Canyon but we do support the Utah Wilderness Coalition's 11,000-acre proposal. We recommend that BLM seriously review the Utah Wilderness Coalition's proposal. BLM should consider the following in making its recommendation. This WSA is a popular hiking area, especially in the Red Cliffs Recreation Area. Wilderness designation here would protect critical wildlife habitat for the gila monster and the chuckwalla. [Sierra Club, Cache Group]

This WSA is adjacent to several thousand acres of roadless lands in the Dixie National Forest. Wilderness designation will better protect the roadless areas. Impressive Navajo sandstone features add to the area's naturalness and wilderness features.

Impacts from potential well drilling for water is minimal and should be discounted in favor of wilderness designation.

**14.5 RESPONSE:** The information provided in the comment is discussed in the EIS and was considered in the development of BLM's Proposed Action. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action. Also, see the response to Specific Comment 14.4.

**14.6 COMMENT:** Earlier, BLM recommended nonwilderness for this area. Now part of the area is being recommended. The key issue is water development.

BLM proposes to delete neat section line areas from the proposal. BLM's analysis does not define the nature of the water source and the likely areas needed to extract it. The partial boundary lacks an extensive analysis of the potential development and its feasibility. [Utah Wilderness Coalition]

BLM describes development of a municipal water system for St. George (wells) as a conflict. St. George desires to develop a municipal water well field in the southern portion of the WSA. The total area BLM indicates is involved is approximately 1,200 acres on the southern boundary. BLM's selection of lands impacted by this water development appears exaggerated in size.

St. George has water rights for 1,500 acre-feet of water, which is found in Navajo sandstone approximately 335 feet down. In view of this small amount of water, it seems possible to redefine the well needs to a more realistic few wells drilled outside the south edge of the WSA.

Recent water project proposals reveal that there are a multitude of other water sources being considered. BLM makes no attempt to identify future water needs and alternate sources for water or conservation alternatives. This issue needs to be addressed, considering other alternatives outside the WSA and water conservation.

**14.6 RESPONSE:** See the response to Specific Comment 14.4. The presence of water in the WSA is demonstrated, and its proximity to the local municipalities makes the area an ideal location for development of water sources. Current exploration of the aquifer is inadequate to determine the extent of feasible development within the WSA or the exact location of the water. However, estimates of water yield range from 14,000 to 84,000 acre-feet per year.

**14.7 COMMENT:** BLM failed to analyze the conflict of mineral development and watershed degradation. BLM also failed to discuss ORV damage. The decrease in wildlife population and diversity was not described or detailed. [Utah Wilderness Coalition]

**14.7 RESPONSE:** The No Action Alternative analysis addresses the subjects referred to in the comment.

**14.8 COMMENT:** Although unstated, it appears that BLM has not done a survey of rare and endangered

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 14: COTTONWOOD CANYON WSA (CONTINUED)**

species. BLM alleges that both the bald eagle and peregrine falcon may use this area. BLM also states that several sensitive raptor species have nesting sites in this area: the prairie falcon and the golden eagle. The gila monster and the chuckwalla are also found; both are on the State's sensitive list. [Utah Wilderness Coalition]

**14.8 RESPONSE:** See the responses to General Comments 9.6 and 16.3, which discuss the need for wildlife and threatened and endangered species data. The information presented in the comment is included in the EIS.

**14.9 COMMENT:** The All Wilderness Alternative removes from future development a potential municipal water source of between 14,000 and 84,000 acre-feet per year.

The Cottonwood Canyon WSA contains substantial and necessary culinary water sources for at least six local municipalities in Washington County. This desert area contains the fastest-growing communities in the State of Utah, and, therefore, no action should be implemented which may conflict in the future development of needed culinary water sources. [Kurt Young]

**14.9 RESPONSE:** Based on the method used by Calvin Clyde, Utah Water Research Laboratory (Clyde, 1979), the 1,477-acre nondesignated area for the Proposed Action has an estimated 45,000 acre-feet of water storage. On an annual basis, the present pumping and spring flow use are about equal with recharge. Therefore, future water development in the WSA would not lead to mining of the resource and would provide a long-term water source for the local municipalities.

**14.10 COMMENT:** No information is provided on the number or location of pre-FLPMA leases on oil and gas. In view of the low rating on minerals, there does not appear to be a management problem. [Utah Wilderness Coalition]

**14.10 RESPONSE:** The number and acreage of pre-FLPMA oil and gas leases and their management implications were discussed in the Draft EIS. This information has been updated in the Final EIS, which reports that there are no pre-FLPMA leases in the Cottonwood Canyon WSA. BLM does anticipate exploration for uranium in the WSA within the foreseeable future.

**14.11 COMMENT:** Both wilderness quality and the degree of conflict for most uses in this WSA are considered moderate for the region except for a potential serious water development conflict with the city of St. George. Additionally, gas company reports indicate that the WSA has potential for hydrocarbon reservoirs. The recommended 9,853-acre Partial Wilderness Alternative mitigates most conflicts, except perhaps the water development conflict. Further assessments should be conducted to determine the extent of these potential conflicts prior to any wilderness designation. [State of Utah]

**14.11 RESPONSE:** See the response to Specific Comment 14.4 concerning water development conflicts and the Partial Wilderness Alternative.

The minerals data have been revised for the Final EIS. The Final EIS reports that the WSA has a low certainty (c1) for the occurrence of small oil and gas deposits. BLM projects that oil and gas development is not likely to occur in the WSA in the foreseeable future. However, there is a more favorable certainty (c2) of small deposits of uranium in the WSA, and BLM assumes that this resource would be explored within the foreseeable future. Additional information on mineral resources is limited, but will be studied by the Geological Survey and Bureau of Mines prior to the Secretary of the Interior's wilderness recommendations to the President and Congress.

Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5, which discuss the analysis assumptions and updating of minerals information for the Final EIS.

**14.12 COMMENT:** Page 12, Geology. More information on uranium and mining methods is needed. [Agency comment]

**14.12 RESPONSE:** See the response to Specific Comment 14.11.

**14.13 COMMENT:** The area clearly has outstanding geological features and scenic qualities not mentioned by BLM. [Utah Wilderness Coalition]

**14.13 RESPONSE:** The Visual Resources section and the Special Features portion of the Wilderness Values section state that, where Navajo sandstone is exposed, the area has special scenic features. No additional information is provided in the comment.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 14: COTTONWOOD CANYON WSA (CONTINUED)**

**14.14 COMMENT:** BLM misrated the visual resources. BLM's VRM class was chosen from the interstate highway which is hidden by foreground terrain outside the WSA. The foreground view from a highway is all that is used. Incorrectly, the WSA received the same rating as the terrain near the highway. BLM has not finished the required resource inventories within this WSA. [Utah Wilderness Coalition]

**14.14 RESPONSE:** BLM has revised the visual resource inventory for the Cottonwood Canyon WSA since publication of the Draft EIS. The text of the Final EIS indicates that the entire WSA is rated as Class A scenery. The visual resources of the WSA are still considered a special wilderness feature.

See the response to General Comment 9.6 for a discussion on the need for additional resource inventories in the WSA.

**14.15 COMMENT:** No cultural inventory appears to have been completed for this area. Not only does this area meet the mandatory wilderness criteria necessary for designation, BLM records support our claim that exceptional wilderness values exist in this area. The designation of a BLM recreation area within this WSA further proves the area's outstanding wilderness values. [Utah Wilderness Coalition]

**14.15 RESPONSE:** The Final EIS discusses the wilderness values found in the WSA. No detailed cultural resource inventory has been completed for the WSA. BLM is aware of two sites which are discussed in the Final EIS. Clearances would be required prior to allowing any surface-disturbing activities. See the responses to General Comments 9.6 and 20.2 for a discussion on the need for additional resource inventories.

The recreation area referred to in the comment is contiguous with but outside of the WSA boundaries.

**14.16 COMMENT:** In this area, the Cedar City District defines high, medium, and low outstanding opportunities for wilderness activities. In this case, they arbitrarily found 1,152 acres as high, 5,264 as medium, and 4,914 as low. This rating system and its inconsistent application violates the Wilderness Study Policy. [Utah Wilderness Coalition]

Besides the hiking (13 miles), sightseeing, horseback riding, rock climbing, photography, wading, associated streamside activities, and camping opportuni-

ties, the Draft EIS indicates that the area offers excellent hunting opportunities for Gambel's quail, mourning dove, and mule deer.

**14.16 RESPONSE:** The Wilderness Values section states that the WSA has about 5,200 acres with outstanding opportunities for solitude and 1,800 acres with outstanding opportunities for primitive and unconfined recreation. The rating system referred to is not used in the Draft EIS or the Final EIS. Also, see the responses to General Comments 8.11 and 22.5.

**14.17 COMMENT:** BLM previously has indicated that any time public land borders development, there are management problems associated with litter, trespass, and vehicle use. These unsubstantiated generalizations fail to support wilderness recommendations within the Study Policy. [Utah Wilderness Coalition]

**14.17 RESPONSE:** The EIS does not indicate that there would be manageability problems associated with litter, trespass, and vehicle use in the Cottonwood Canyon WSA. The EIS does report that ORV use in Washington Hollow would be eliminated, and that recreation use at Red Cliffs could increase significantly due to the Quail Creek Reservoir, adversely affecting opportunities for solitude in the WSA.

**14.18 COMMENT:** Wilderness designation is opposed by local government. Instead of recommending wilderness: "BLM proposes to maintain the area in multiple-use management." Wilderness lands are, of course, managed under multiple use. BLM has established the Red Cliffs Recreation Area (1,005 acres) within the WSA. The developed portion of the recreation area lies just outside the WSA boundary. [Utah Wilderness Coalition]

BLM mentions that the Partial or All Wilderness Alternative is inconsistent with State and local plans and policies. No specific State plan exists, and no policy is cited. BLM offers no description of those conflicts nor any reference to any approved county plan.

**14.18 RESPONSE:** The Land Use Plans and Policies section addresses not only formal plans, but the stated policies and objectives of local governments. The State of Utah and Washington County have issued public statements and resolutions in opposition to wilderness designation in Utah. These resolutions and policies are discussed in the Final EIS. The Draft EIS for the Cottonwood Canyon WSA did not refer to State

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 14: COTTONWOOD CANYON WSA (CONTINUED)**

and local "plans," but to the "policy" of Washington County.

**SECTION 15**  
**LAVERKIN CREEK CANYON WSA**

**15.1 COMMENT:** The Black Ridge section of LaVerkin Creek extending southwest of the Kolob has become an increasingly popular route into the park. Visitors to this area enjoy the wide drainage gently carved in sandstone. Topographical screening is provided by the winding character of the creek and the often dense riparian vegetation. The Black Ridge contributes to the scenic quality of this area. This unique, volcanically formed mesa provides contrast to the surrounding environment in its dark lava ruggedness and possesses supplemental wilderness values in its geological uniqueness. We ask BLM to reconsider wilderness recommendation for the Black Ridge in a supplemental Wilderness Draft EIS. [National Parks and Conservation Association]

**15.1 RESPONSE:** See the response to General Comment 3.1.

**15.2 COMMENT:** These 10 WSAs are ranked as a group, the Zion units, and are considered natural, logical extensions of Zion National Park. There are land use conflicts found in gas company reports. These indicate oil and gas potential (in terms of reservoir storage) in LaVerkin Creek Canyon, Deep Creek, North Fork Virgin River, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, Goose Creek Canyon, and Beartrap Canyon. An additional conflict is present in Spring Creek Canyon associated with the water supply for Kanarraville. Also, the Washington County Conservancy District is considering the construction of Bullock Reservoir immediately upstream from the north boundary of the North Fork Virgin River WSA. The County foresees increased hydroelectric capacity from the current Quail Creek Reservoir and the proposed Bullock Reservoir. Given the small size of the WSAs and their adjacency to Zion National Park, additional study should be given to the potential of transferring most of these WSAs from BLM to NPS management. [State of Utah]

**15.2 RESPONSE:** The resources and conflicts noted in the comment are analyzed in the appropriate WSA analyses and were considered in development of the BLM Proposed Action.

The responses General Comment 3.24, 10.2, and 23.15 discuss transferring of BLM WSAs to the NPS. BLM considers transfer of lands to other agencies as separate from the wilderness study.

**15.3 COMMENT:** As a NPS employee at Zion National Park, we were always coming up against a problem of being able to manage whole ecosystems and whole drainages. So I was really happy to see that BLM has set aside or requested that the areas of the upper canyons around Zion National Park be set aside. And, for instance, the kind of thing that happens in Zion when you can't control the whole drainage is that the NPS never knew how many fecal coliforms were going to be in the Virgin River where people were wading all the time and cattle would be coming through in the upper drainages. For this reason, the Red Butte, Spring Creek Canyon, Watchman, Taylor Creek Canyon, LaVerkin Creek Canyon, and all of the other ones around the top are really important to be set aside for the Zion National Park management. [Alice Lindahl]

**15.3 RESPONSE:** See the responses to General Comments 3.23, 3.24, 7.2, 8.7, 14.19, 23.14, and 23.15, which address the relationships of NPS land and BLM WSAs.

**15.4 COMMENT:** Flood control development is not needed in the WSA. [Bob Lineback]

**15.4 RESPONSE:** The EIS does not identify the need for flood control measures in the WSA. No flood control projects have been proposed.

**15.5 COMMENT:** Water development is not needed as the water originating here is used downstream and is claimed by municipal and private parties. [Bob Lineback]

**15.5 RESPONSE:** The only potential noted in the EIS is for well development in the Navajo sandstone aquifer. However, the EIS states that there is no demand for additional water development from these areas and no projects have been proposed.

**15.6 COMMENT:** Too much emphasis is placed on oil and gas potential. The economics of removal from this rugged, isolated area would prevent recovery of the minor amounts that could be developed if found. Most could be recovered from ridges adjacent to the WSA. [Bob Lineback]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 15: LAVERKIN CREEK CANYON WSA (CONTINUED)**

**15.6 RESPONSE:** The EIS reports that there is very low certainty (c1) that small accumulations of oil and gas (f2) are within the WSA. No development of oil and gas in this WSA is anticipated in the foreseeable future.

**15.7 COMMENT:** The uranium oxide, if present, is several thousand feet deep and unrecoverable under present technologies and economies. Why even mention it? [Bob Lineback]

**15.7 RESPONSE:** Uranium is included in the site-specific discussion for use in the cumulative analysis presented in Volume I. Extraction of uranium from the WSA is not anticipated.

**15.8 COMMENT:** While there are no wild horses or burros, there are some wild pigs in the WSA. Hunters (local) claim they provide good meat. They usually find them on the plateau areas. [Bob Lineback]

**15.8 RESPONSE:** The information provided in the comment has not been well documented and is, therefore, not included in the Final EIS. It should be noted that the presence of feral animals is not considered to enhance wilderness values.

**15.9 COMMENT:** There are no conflicts with wilderness designation. The annual cattle drive through the park is allowed in designated wilderness. [Utah Wilderness Coalition]

**15.9 RESPONSE:** The EIS states that there would be little effect on livestock grazing from wilderness designation. There is no designated wilderness in the park.

**15.10 COMMENT:** Horseback riding should be mentioned as a recreation use, although it is limited. Fishing should be deleted--there are no fish in the WSA that I have seen. [Bob Lineback]

**15.10 RESPONSE:** The text has been revised as suggested in the comment.

**15.11 COMMENT:** I agree with the 100 person per year estimate of recreation user days. I estimate that users spend about \$15/day (includes travel, food, gear, etc.), which translates to about \$1,500 a year benefit to Utah's economy. [Bob Lineback]

**15.11 RESPONSE:** See the response to General Comment 21.19. Not all of the expenditures identified

in the comment would occur in local communities. Therefore, the value of recreation expenditures to the local economy is less than the total.

**15.12 COMMENT:** I resent the implication that \$1,701 in mineral lease monies would be lost with the All Wilderness Alternative. If there were minerals there, they would be leased by now. [Bob Lineback]

**15.12 RESPONSE:** Not all mineral values are leased. Of the \$1,701 reported in the Draft EIS, \$1,320 represents fees for land that was under lease at the time. There are no oil and gas leases within the WSA at the present time.

**SECTION 16**  
**DEEP CREEK WSA**

**16.1 COMMENT:** Deep Creek originally was 7,070 acres in size. BLM alleged that a way divided the WSA. This insignificant way does not cross the WSA and is only evident in a small area above the canyon walls. BLM violated the inventory policy leading to a WSA with a size less than 5,000 acres. The size of the WSA plays an important role in BLM's rationale to drop this area. This rationale hinges on the earlier violations of the inventory policy. The Deep Creek area is part of a larger roadless area consisting of private and State lands totaling more than 40,000 acres. If the adjacent wild park lands are included, an enormous area should be considered in the comprehensive wilderness study. [Utah Wilderness Coalition]

**16.1 RESPONSE:** See the response to General Comment 3.1, which discusses BLM's wilderness inventory in Utah. According to the Wilderness Inventory Handbook (USDI, BLM, 1978), BLM was to inventory public and not State or private lands.

**16.2 COMMENT:** While the lower portion of Deep Creek has been recommended as wilderness, the present WSA boundary arbitrarily cuts off much of this drainage. It is our understanding that BLM drew this boundary to allow for potential recreational development in the upper half of Deep Creek. We would be very skeptical regarding any plans for development in this area, given the high wilderness value of upper Deep Creek and its proximity to the huge 120,620-acre proposed NPS wilderness across the park border. [Terry Martin, NPCA]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 16: DEEP CREEK WSA (CONTINUED)**

**16.2 RESPONSE:** See the responses to General Comment 3.1 and Specific Comments 16.1 and 16.4.

**16.3 COMMENT:** It is unfortunate that BLM only considers the lower half of Deep Creek for wilderness. We feel that the upper half should be wilderness also. This area contains significant and outstanding opportunities for solitude and primitive recreation in a very natural setting. [Sierra Club, Cache Group]

**16.3 RESPONSE:** Because of the small size of the WSA, the opportunities for solitude and primitive recreation are less than outstanding unless the WSA is considered with adjacent NPS lands. The upper portion of the Deep Creek inventory unit was not carried to WSA status because it did not meet the inventory criteria.

Also, see the responses to General Comment 3.1 and Specific Comment 16.1.

**16.4 COMMENT:** We would like to discourage BLM from implementing its proposed mechanized recreation facility in the upper portion of Deep Creek. This would compromise the wilderness character of the area. It should be preserved as wilderness, as identified in the Utah Wilderness Coalition's proposal. [Sierra Club, Cache Group]

**16.4 RESPONSE:** The comment refers to an area outside WSA boundaries. See the response to General Comment 3.1 for a discussion of BLM's wilderness inventory in Utah.

**16.5 COMMENT:** BLM has built a recreation area near the middle of the canyon which should not have been built under BLM's IMP. The area does not seriously impact the wilderness values and serves as a hiking starting point. [Utah Wilderness Coalition]

**16.5 RESPONSE:** There are no BLM recreational developments in the WSA. There are developments on private lands near the WSA.

**16.6 COMMENT:** I have professional familiarity with the Zion National Park area, and feel strongly that many important parts of the watershed surrounding the park should be protected so that the natural area of this famous and much-loved, much-visited park can be managed as one unit. For instance, water reaching the Zion Narrows must go through other drainages before reaching the park, and the park needs to have control over what goes into that water.

In addition, many wild animals migrate to higher elevations, out of the park in summer. If Zion is to protect the populations of animals, it must be able to manage their entire range. Thus, Parunuweap Canyon, Canaan Mountain, Deep Creek, Orderville Canyon, and Black Ridge should definitely be part of the wilderness. I think it was very short sighted to leave them out, and I am strongly opposed to the construction of a dam in Parunuweap Canyon. [Alice Lindahl]

**16.6 RESPONSE:** The resources addressed in the comment are discussed and analyzed in the EIS. The question of transfer of BLM WSAs to the NPS could occur with or without wilderness designation and would be an independent action that would be evaluated on its own merits outside of the wilderness review.

BLM's Proposed Action for the Deep Creek WSA is All Wilderness, which is compatible with the views expressed in the comment.

**16.7 COMMENT:** Sonic booms can hardly be heard; they are covered by river noise. [Bob Lineback]

**16.7 RESPONSE:** The EIS does not address sonic booms in the Deep Creek WSA.

**16.8 COMMENT:** The basalt lava flows capping the Navajo Formation are an unusual geological variation to the cliff theme found in the area. [Bob Lineback]

**16.8 RESPONSE:** The Geology and Visual Resources sections of the Final EIS include the information provided in the comment. The combination of Navajo sandstone and basalt flows is common in Washington County.

**16.9 COMMENT:** Records for water quality for Kolob Creek are available due to the Kolob Reservoir Dam (controlled flow). Records for North Fork are available from USGS from a monitoring station on the North Fork Road. Zion North Fork has some water quality study results. There is a demand for the water (and valid State-granted water rights) to downstream municipal and private users. This WSA protects this important watershed--an important goal of Congress as shown in several public laws regarding the protection of watersheds, water quality, etc. [Bob Lineback]

**16.9 RESPONSE:** Additional information on water standards has been included in the Final EIS.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 16: DEEP CREEK WSA (CONTINUED)**

**16.10 COMMENT:** The Deep Creek WSA may have significant implications on the Kolob water exchange with Cedar City and their ability to divert water into the Iron County area out of the upper regions of the Virgin River. [Washington County Water Conservancy District]

**16.10 RESPONSE:** Federal reserved water rights for instream flows in the Virgin River have already been asserted by the National Park Service for Zion National Park and FWS to seek to protect flows for the Woundfin minnow. Designation of the Deep Creek WSA would not significantly add to constraints on water development upstream of Zion National Park.

**16.11 COMMENT:** Linked to the northwest part of Zion National Park, this area provides critical clear mountain water to the park in a deeply entrenched canyon. [Utah Wilderness Coalition]

**16.11 RESPONSE:** The information provided in the comment has been added to the Water Resources section of the Final EIS.

**16.12 COMMENT:** The oil and gas industry rates the potential as moderate. USGS will affirm the low ranking. Page 8: I disagree with the emphasis on mineral and energy resources. The uranium oxide mentioned (150 tons) may underlie the whole of southern Utah at unrecoverable depth. [Bob Lineback]

**16.12 RESPONSE:** The Final EIS reports that there is low certainty for small quantities of minerals within the WSA. BLM does not anticipate development of any minerals in the WSA within the foreseeable future.

**16.13 COMMENT:** Page 11: Bear are found intermittently on the plateaus of this area. The plateau (upland) sections of this WSA are important for elk. I have seen a lithic scatter on one of the upland areas of this WSA. [Bob Lineback]

**16.13 RESPONSE:** The area's importance to elk was already discussed in the Draft EIS. The information on bear and lithic scatters has been added to the Final EIS.

**16.14 COMMENT:** Statements in several of the WSA descriptions, such as "No other threatened or endangered species are known to occur in the WSA," may be misleading if they cannot be supported with actual survey data. We believe this is important to be

verified because many of the WSAs adjacent to Zion National Park are ideal peregrine falcon habitat. These WSAs include Parunuweap Canyon, Canaan Mountain, Deep Creek, Orderville, and Spring Creek Canyon. [National Park Service]

**16.14 RESPONSE:** The Draft EIS noted the presence of the peregrine falcon and stated that no "other" threatened or endangered species are known to occur in the WSA. Also, see the response to General Comment 16.3.

**16.15 COMMENT:** Page 11, Wildlife, Paragraph 4: The Draft EIS states that there is only light hunting pressure and that no critical habitat for big game occurs within the WSA. UDWR believes that the area receives substantial hunting pressure and that an unquantified amount of critical deer winter range exists. [State of Utah]

**16.15 RESPONSE:** BLM estimates that hunting pressure is light because of difficulty of crossing private and NPS lands to get to the area. BLM is processing a land exchange to exchange Federal lands outside the WSA for private lands outside the WSA to provide additional access to the area. BLM data indicate that the WSA is summer rather than winter range for deer. Because of the elevation, the area is not critical deer winter range, although some deer may remain in the area late in the year.

**16.16 COMMENT:** For several of the small WSAs, we suggest it would be meaningful to discuss recent changes in use intensity which have taken place. For example, during studies in 1982 certain levels of use for these areas were identified which have since changed. These changes are as follows: [National Park Service]

WSA	Comparison between	
	1982	EIS
Taylor Creek	2 AUMs	20 AUMs
Deep Creek	246 AUMs	188 AUMs
Red Butte	784 acres	788 acres
	oil/gas lease	oil/gas lease
Orderville	No grazing	30 AUMs
Orderville	No mining claims	20 acres
Spring Creek Canyon	No grazing	30 AUMs

We suggest the text analyze how such changes have affected the integrity of these WSAs.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 16: DEEP CREEK WSA (CONTINUED)**

**16.16 RESPONSE:** The complete reference to the study referred to in the comment was not provided to BLM. Current BLM records indicate that 201 AUMs are allocated in this WSA.

See the appropriate WSA response sections for responses to questions on the remaining WSAs.

**16.17 COMMENT:** Why would visual quality be impaired on 20 acres if it was made wilderness or it is not? [Bob Lineback]

**16.17 RESPONSE:** Valid mining claims in WSAs can be developed with or without wilderness designation. Therefore, the Draft EIS reported disturbance with both the No Action and All Wilderness Alternatives. However, the disturbance estimates have been revised for the Final EIS, and no mineral-related disturbance is anticipated in the Deep Creek WSA in the foreseeable future.

Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5 which discuss analysis assumptions and updating of mineral information for the Final EIS.

**16.18 COMMENT:** The recreation use of Deep Creek will jump exponentially with BLM access rights gained for the Volcano Knoll access road. Lots of people want to hike Deep Creek which is a nontechnical route, but access is difficult. The Zion Visitor Center has an unpublished route description to Deep Creek available at the front desk. It has not been published due to access difficulties (private lands blocking access). [Bob Lineback]

**16.18 RESPONSE:** The problems with access to the WSA are recognized in the Final EIS. BLM is processing a land exchange which will allow public access into the Deep Creek area.

**16.19 COMMENT:** When BLM proposed nonwilderness for this area, BLM determined Deep Creek "to be more valuable for future use in connection with the Bureau's own recreation program." No additional detail is given. BLM needs to explain these plans with maps and text. There is no evidence that shows that these recreation plans are incompatible with a wilderness designation for this area. [Utah Wilderness Coalition]

**16.19 RESPONSE:** BLM's Proposed Action for the Deep Creek WSA is the All Wilderness Alternative. See Appendix 11 in Volume I.

**16.20 COMMENT:** In reviewing the subject Draft EIS from the perspective of Nationwide Rivers Inventory streams, we find, in general, that it was very well done. Virtually all relevant Nationwide Rivers Inventory streams are discussed in an appropriate manner and context. However, in Volume III in the section on the Deep Creek WSA; Deep Creek from its confluence with the North Fork of the Virgin River to its source should be discussed as a Nationwide Rivers Inventory stream in a manner similar to other such stream discussions. [National Park Service]

**16.20 RESPONSE:** The text revision has been made as suggested in the comment.

**16.21 COMMENT:** Abundant wildlife (598 known); ancient Indian petroglyphs, stone granaries, and rock structures; and world class canyon hiking occur in Deep Creek WSA. [Utah Wilderness Coalition]

**16.21 RESPONSE:** Because of the small size of the WSA, BLM has determined that the opportunities for primitive recreation (hiking, backpacking, etc.) are outstanding only in conjunction with adjacent NPS lands.

The cultural resources noted in the comment are outside of WSA boundaries. The presence of wildlife in the WSA is discussed in the EIS.

**16.22 COMMENT:** I have some personal experience there--I have hiked both the length from the canyon (Deep Creek, Kolob Creek, the North Fork) and been on the plateau west of Deep Creek and northeast of the Deep Creek/North Fork confluence. The scenery was breathtaking and the opportunities for solitude were outstanding (despite what the EIS says twice on Page 13). [Bob Lineback]

**16.22 RESPONSE:** See the response to Specific Comment 16.20.

**16.23 COMMENT:** The WSA abuts a national park proposed wilderness. BLM proposed to acquire additional natural lands next to this WSA with preservation in mind. [Utah Wilderness Coalition]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 16: DEEP CREEK WSA (CONTINUED)

**16.23 RESPONSE:** BLM is processing a land exchange to provide access to the Deep Creek area. This is noted in the Recreation section of the Final EIS.

**16.24 COMMENT:** Page 2, No Action/No Wilderness Alternative, Paragraph 1: It is suggested that the term "near" not be used to describe the proximity of non-BLM lands to WSAs. State mineral lands lie adjacent to the WSA: in fact, the WSA boundary was changed from earlier versions to exclude State/private split-estate. An inconsistency is noted in the mapping of split-estate lands, e.g., Cedar Mountains WSA vs. Deep Creek WSA. [State of Utah]

**16.24 RESPONSE:** The terms "adjacent" or "contiguous" are used in the Final EIS.

### SECTION 17

#### NORTH FORK VIRGIN RIVER WSA

**17.1 COMMENT:** This area is crossed by the Narrows Trail, one of the most popular backpacking trips in this region. The trip through this WSA is of the same quality as the portion of the trip within the national park. In the previous study phase, BLM recommended nonwilderness requiring national park management of the area. BLM has comprehensively assessed the values found in the total roadless area in and out of the park. There are no manageability or conflict problems consistent with the Wilderness Study Policy that impede wilderness designation. [Utah Wilderness Coalition]

**17.1 RESPONSE:** The recreational use of the WSA and its relationship to The Narrows in Zion National Park are discussed in the Recreation section of the Final EIS.

BLM's Proposed Action is the All Wilderness Alternative. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action.

**17.2 COMMENT:** The Washington County Water Conservancy District, in conjunction with Cedar City, has a feasibility report on the Bullock Reservoir site. The engineering is done, as is the preliminary design. That reservoir is a very feasible reservoir with a high water yield at a reasonable cost per acre-foot. The proposed wilderness area would abut against it. We think the implications need to be addressed carefully in the report. Contrary to BLM's representation

in the EIS, there are existing water rights in the area. Water rights have been acquired by the Water Conservancy District which would allow for construction of a reservoir on private property immediately north of the WSA. The proposed change of diversion and location of storage rights can be granted by the Utah State Engineer. The feasibility plans for the Bullock Reservoir are attached. [Washington County Water Conservancy District]

**17.2 RESPONSE:** The feasibility study provided by the commentor was reviewed by BLM. The Water Resources and Land Use Plans and Controls sections have been revised to incorporate a discussion concerning the proposed Bullock Reservoir.

**17.3 COMMENT:** Under Wildlife (Page 12), I have seen both bald eagle and golden eagle a couple of miles from the WSA. [Bob Lineback]

**17.3 RESPONSE:** Both the Draft EIS and Final EIS state that bald and golden eagles may be present within the WSA. The sightings reported in the comment substantiate this statement.

**17.4 COMMENT:** On Page 8 of the EIS, it says that the Proposed Action would impair 20 acres of visual resources. What does that mean? [Bob Lineback]

**17.4 RESPONSE:** The 20 acres referred to in the comment are those projected to be directly impacted by surface-disturbing activities, which would destroy the form, line, color, and texture of the disturbed area. The Final EIS assumes that no surface disturbance would occur in the North Fork Virgin River WSA in the foreseeable future; therefore, visual resources would not be affected.

**17.5 COMMENT:** I find that the summary table does not list the benefits of the recreation user to the local economy under recreation. Yet some of these bogus mineral/energy possibilities are listed under socio-economics. How about clarifying in the Final EIS? [Bob Lineback]

**17.5 RESPONSE:** The summary table is intended to present the "significant" environmental consequences of each alternative in a comparative fashion. The mineral information has been revised and updated for the Final EIS. The Final EIS analysis indicates that mineral development opportunities would not be significant in the North Fork Virgin River WSA under either alternative, and the mineral discussion has been removed

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 17: NORTH FORK VIRGIN RIVER WSA (CONTINUED)**

from the summary table. Likewise, any effects to the local economy from increases in recreational use of the WSA would not be significant, and such losses are not presented in the summary table. Effects to the local economy from recreational use of several WSAs are analyzed in Volume I.

See the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5 for discussions on the analysis assumptions and updating of mineral information for the Final EIS. See the responses to General Comments 15.22, 21.15, 21.17, 21.19, 24.8, and 24.14 for information on economic considerations of recreation and mineral development.

**SECTION 18**  
**ORDERVILLE CANYON WSA**

**18.1 COMMENT:** This is another area that possessed more than 5,000 acres initially (5,080 acres). BLM used largely reclaimed insignificant human impacts to make this area less than 5,000 acres. If the entire roadless area of BLM, State, and some private lands is considered, an area more than 12,000 acres possesses wilderness characteristics. This is all adjacent to the even larger wilderness lands of Zion National Park. The policy violations in the inventory are used by BLM to support more deletions in the wilderness study stage. [Utah Wilderness Coalition]

**18.1 RESPONSE:** See the responses to General Comment 3.1 and Specific Comment 16.1.

**18.2 COMMENT:** I think you drew the boundaries too small and close to the canyon on this WSA. There are some ridges with outstanding views to the southwest of the unit (southwest of Englestead Hollow) and adjacent to Zion National Park. The same situation exists on the north side of the WSA adjacent to Esplin Gulch. Why is the upper section of Walker Gulch not included? Why isn't the jeep trail in Section 17 used as the boundary of this WSA instead of having a vehicle way remain in the proposed wilderness? [Bob Lineback]

**18.2 RESPONSE:** See the responses to General Comment 3.1 and Specific Comment 16.1.

**18.3 COMMENT:** BLM has proposed a No Action Alternative under which even the scenic canyon bottom would not be included as wilderness. Since the

oil, gas, and mineral development hypothesized in the EIS would occur, if at all, on the benches above the canyon and not in the canyon bottom (which is prone to flash flooding and has difficult access, even on foot), I do not understand why the entire WSA was excluded. Please explain. [Gordon Swenson]

**18.3 RESPONSE:** BLM's Proposed Action was and still is the All Wilderness Alternative. The No Action/No Wilderness Alternative was analyzed to comply with NEPA regulations. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

**18.4 COMMENT:** Page 9, Geology, Paragraph 3: "Rocks of Jurassic age, with a total depth of 1,500 feet," should probably read: ". . . with a total thickness of 1,500 feet." [State of Utah]

**18.4 RESPONSE:** The text has been reworded as suggested in the comment.

**18.5 COMMENT:** Page 9, Geology, Paragraph 4: "Minor outcrops of undivided Jurassic sediments" should probably read, ". . . of undifferentiated Jurassic sediments." [State of Utah]

**18.5 RESPONSE:** The change has been made as suggested in the comment.

**18.6 COMMENT:** Under wildlife (Pages 11 and 12), I have seen black bear tracks in the WSA (1985). [Bob Lineback]

**18.6 RESPONSE:** The text has been revised to indicate the presence of black bear in the WSA.

**18.7 COMMENT:** Statements in several of the WSA descriptions such as: "No other threatened or endangered species are known to occur in the WSA" may be misleading if they cannot be supported with actual survey data. We believe this should be verified because many of the WSAs adjacent to Zion National Park are ideal peregrine falcon habitat. These WSAs include Parunuweap Canyon, Canaan Mountain, Deep Creek, Orderville, and Spring Creek Canyon. [National Park Service]

**18.7 RESPONSE:** See the response to Specific Comment 16.14.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 18: ORDERVILLE CANYON WSA (CONTINUED)**

**18.8 COMMENT:** Inadvertently, I have seen peregrine falcon from the edge of this canyon. I don't know where they nest. [Bob Lineback]

**18.8 RESPONSE:** The EIS states that peregrine falcon may be present in the WSA because of the occasional sightings in adjacent areas, an adequate prey base, and excellent nesting habitat within the WSA.

**18.9 COMMENT:** Your No Action Alternative would allow development, which may increase siltation rates and impact the endemic Zion snails. [Bob Lineback]

**18.9 RESPONSE:** The Draft EIS noted that future mineral exploration would not have a significant effect on soil loss within the Orderville Canyon WSA. The mineral development and disturbance estimates have been revised for the Final EIS. No mineral-related surface disturbance is projected for this WSA within the foreseeable future.

See the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5, which discuss analysis assumptions and updating of minerals information for the Final EIS.

**18.10 COMMENT:** For several of the small WSAs, we suggest it would be meaningful to discuss recent changes in use intensity which have taken place. For example, during studies in 1982, certain levels of use for these areas were identified which have since changed. These changes are as follows: [National Park Service]

WSA	Comparison between	
	1982	EIS
Taylor Creek	2 AUMs	20 AUMs
Deep Creek	246 AUMs	188 AUMs
Red Butte	784 acres	788 acres
	oil/gas lease	oil/gas lease
Orderville	No grazing	30 AUMs
Orderville	No mining claims	20 acres
Spring Creek Canyon	No grazing	30 AUMs

We suggest the text analyze how such changes have affected the integrity of these WSAs.

**18.10 RESPONSE:** The complete reference to the study referred to in the comment was not provided to BLM. BLM records indicate that 1,300 acres of the Orderville Gulch grazing allotment are within the WSA, and 30 AUMs are allocated in this area. There

is also one mining claim within the WSA. The Final EIS analysis is based on these data.

See the appropriate WSA comment sections for responses to the questions for the remaining WSAs.

**18.11 COMMENT:** Most of the recreation use here is by hikers, yet those visitors days are shown on the No Action/No Wilderness Alternative side of the summary table on Page 8. [Bob Lineback]

**18.11 RESPONSE:** The summary table has been revised to explain that the same baseline increase in visitation would occur with both the No Action/No Wilderness and All Wilderness Alternatives.

**18.12 COMMENT:** This canyon offers one of the most popular backpacking routes into the national park. BLM failed to fully consider this area as part of that wilderness experience. [Utah Wilderness Coalition]

**18.12 RESPONSE:** The EIS addresses the relationship of Zion National Park to the WSA and notes the amount of backpacking use. Because it is adjacent to the park, BLM's Proposed Action is the All Wilderness Alternative. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action.

**18.13 COMMENT:** On Page 13, under Recreation: I believe a public right of access exists across the private property. Hikers have been regularly using this route for over 20 years. [Bob Lineback]

**18.13 RESPONSE:** There is not an established legal public right of access across private lands for this WSA.

**18.14 COMMENT:** The socioeconomics summary really emphasizes coal/mineral leasing and skips on the tourism benefits. [Bob Lineback]

**18.14 RESPONSE:** The contribution of tourism is incorporated in the figure given for annual local sales. The analysis in the Draft EIS did not emphasize coal revenues because there is no coal resource in the WSA. The Final EIS analysis states that there would not be any mineral development within the WSA in the foreseeable future.

**18.15 COMMENT:** Page 3, All Wilderness Alternative: Part of the specific actions that would take

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 18: ORDERVILLE CANYON WSA (CONTINUED)**

place for minerals has been left out. [Agency comment]

**18.15 RESPONSE:** The Description of the Alternatives section has been revised to include a complete description of the mineral actions under each alternative.

**SECTION 19**  
**PARUNUWEAP CANYON WSA**

**19.1 COMMENT:** BLM should remember the history of this area. First, BLM tried to drop the entire area from the wilderness study system, but then this was appealed and the agency lost. Later, BLM tried to recommend no wilderness at all for this pristine canyon system, but soon thereafter the agency changed its mind. This partly demonstrates that Parunuweap Canyon has true wilderness characteristics and tremendous public support for preservation. [Sierra Club, Cache Group]

**19.1 RESPONSE:** See the responses to General Comments 2.4 and 3.1.

**19.2 COMMENT:** Boundary adjustments are needed on the north. The road that comes down to State Sections 2 and 36 west of Mineral Gulch becomes impassable to 2-wheel drive just after crossing into Section 36. The boundary should include these State sections and the road should be closed at that point or nearby where it can be effectively closed. Permitted use of the road could be allowed if necessary. Also, State Section 32 east of Mineral Gulch should be included in the recommendation. The boundary could follow topographic features. These adjustments would increase the manageability of the north boundary considerably, particularly the Meadow Creek and Mineral Gulch area. [Dean Petaja]

**19.2 RESPONSE:** See the responses to General Comments 3.1 and 6.4. BLM's wilderness review process is directed towards public lands rather than private or State lands.

**19.3 COMMENT:** According to the Draft EIS, BLM is proposing all of this WSA for wilderness designation, yet the included map (Pocket Map 1, BLM Proposed Action) shows a Partial Wilderness Alternative of approximately 14,000 acres. Needless to say, this is more than a little confusing to anyone interested in

the intent of BLM with respect to these proposals. Frankly, I hope that this a cartographic error. [Michael Van Note]

**19.3 RESPONSE:** The error is an editorial one, not a cartographic one. The BLM Proposed Action for the Draft EIS was the 14,000-acre Partial Wilderness Alternative. BLM's Proposed Action for the Final EIS has changed to a 17,888-acre Partial Wilderness Alternative. The rationale for the Proposed Action is summarized in Appendix 11. Also, see the response to General Comment 25.18.

**19.4 COMMENT:** Page 4, All Wilderness Alternative, Paragraph 1: Two State sections are within the WSA (Page 1, Paragraph 1). Same comment for Page 24, Paragraph 1. [State of Utah]

**19.4 RESPONSE:** The text has been revised to indicate that 640 rather than 1,280 acres of State lands are within the WSA.

**19.5 COMMENT:** Page 5, Map: The WSA boundary wrongly excludes the "cornered" State inholding. [State of Utah]

**19.5 RESPONSE:** The map referred to in the comment is drawn accurately. There is only one section of State land within the WSA. BLM's wilderness review process is directed at public rather than State or private lands. Also, see the response to Specific Comment 19.4.

**19.6 COMMENT:** BLM bulldozed an old jeep road to improve hunter access, so that ORVs are now intruding as well. Engineers for Creamer and Noble in St. George have been marking dam sites within the WSA. BLM proposes the Partial Wilderness Alternative (No. 3), only half the WSA. Why? This Draft EIS contains dreadful contradictions of fact. This Zion-type area must be protected as all wilderness, and the Draft EIS amended to remove the errors, conflicts, and lies. [M.P. Cohen]

**19.6 RESPONSE:** The old jeep road referred to in the comment is actually a cherry-stemmed road periodically maintained to provide historical access to Poverty Flat. The survey work done within the WSA was nonimpairing and is consistent with the IMP which allows for studies. Therefore, the recent activities allowed in the Parunuweap WSA are in compliance with IMP.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)**

Also, see the response to Specific Comment 19.9 for a discussion of the perceived conflicts in the analysis.

**19.7 COMMENT:** Perhaps even more disturbing are recent actions taken in Parunuweap by the Washington County Water Conservancy District. Damming this area is unthinkable, and commencement of engineering activities before the wilderness review is complete is an unconscionable violation of public trust. [Mark Peterson]

**19.7 RESPONSE:** See the response to Specific Comment 19.6.

**19.8 COMMENT:** Now BLM is proposing that much less than the entire WSA be declared wilderness. Yet the Draft EIS itself does not give evidence of why the whole area shouldn't be wilderness. The Draft EIS states that there are no significant conflicts with any mineral or energy sources anywhere in the WSA (Volume III-A, Pages 17-18). It states that there are no wilderness manageability problems with any of the WSA, including the deleted acreage (Volume I, Page 37).

BLM deleted acreage in three areas. It deleted 2,000 acres in Joseph Canyon for wilderness consideration without really saying why. There is no specific discussion of resource conflicts or manageability problems with Joseph Canyon. BLM simply notes an unsubstantiated claim that, unlike the similar adjacent canyon (Joseph Canyon) lacks solitude. I don't go along with that. [Utah Wilderness Coalition, et al.]

**19.8 RESPONSE:** See the responses to Specific Comment 19.28 and General Comment 22.5. Appendix 11 in the Final EIS summarizes the rationale for the BLM Proposed Action.

**19.9 COMMENT:** It appears that BLM has cut acreage from the WSA for no justifiable reason. For Elephant Cove, Harris Mountain, and Rock Creek, the Draft EIS does give some potential resource conflicts, an 1,800-acre chaining to improve mule deer habitat, the possibility of harvesting pinyon pine and juniper, and ORV use. However, the Draft EIS is very inconsistent on these potential conflicts. In one place it says "mule deer are common yearlong residents in the WSA"; in another "Big game hunting is generally poor to fair throughout the WSA because of low game populations, dense stands of trees, and the seasonality of mule deer use." In addition, statements on

dense tree cover conflict with statements on solitude where the EIS says that there is a lack of solitude in Elephant Cove because of the "lack of vegetative screening." [Scott DeLong, et al.]

In one place it says "the Elephant Cove and Block Mesa areas are extensively used for woodland harvest"; in another place "Accurate data of the amount of forest resources harvested in this area in the past are not available . . ."; and in yet another "There is minimal harvest of forest products at the present time." In one place it says "ORV use, however, would be eliminated, which has historically been the greatest recreational use"; in another place "for both primitive and nonprimitive types of recreation use (ORV), very little data on existing use are available." Judging by these contrasting statements, BLM's decision to delete this 12,500-acre area is arbitrary and undocumented.

**19.9 RESPONSE:** The commentor has taken the statements out of context. Mule deer are a common species that do occur throughout the area; however populations do fluctuate and are lower during certain years or times of the year and in different portions of the WSA. The Recreation section of the Affected Environment states that: "Big game hunting is generally poor to fair throughout the WSA because of the dense tree cover, low game populations, and the seasonality of mule deer use." All of these factors combined affect hunting success in the WSA as a whole. The statement that mule deer are common yearlong residents does not contradict the statements on the quality of the hunting experience in the WSA.

Additionally, the statement on dense tree cover is in the Recreation section and makes no specific reference to Elephant Cove. As noted above, dense tree cover is only one factor that contributes to poor hunting success, but this does not indicate that the entire WSA is covered by dense stands of trees.

The statement that "Elephant Cove and Block Mesas have been used extensively" for harvest of wood products is qualitative and based on observations of BLM personnel. The statement that "Accurate data of the amount of forest resources harvested in this area in the past are not available" indicates that exact records of the total number of cords of wood, posts, and Christmas trees have not been kept. This does not invalidate the qualitative statement on extensive use of forest products. In the Final EIS, the word

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)**

"accurate" has been replaced by "quantitative" to better explain the meaning.

There is minimal use of the area at the present time because BLM directs cutting permits away from WSAs to avoid impairment of wilderness values. However, the areas described in the EIS have been used in the past and have potential for future use.

As with forest resources, there is little quantitative data on visitor use for the Parunuweap WSA. However, qualitative statements and an estimated range of use is provided, based on the knowledge of BLM recreation specialists who are familiar with the area.

See the responses to General Comments 9.8 and 21.5. BLM believes the available data to be sufficient for purposes of the study. Also, see the response to General Comment 9.6 that deals with questions on resource data.

**19.10 COMMENT:** Parunuweap is considered the WSA with the highest wilderness values and highest conflicts for this region. The outstanding wilderness values, particularly those associated with Parunuweap Canyon on the East Fork of the Virgin River, are among the best of their kind. These same resources create major conflicts in the WSA. Water resource developments associated with proposed dam sites in Parunuweap Canyon would be precluded by the 14,100-acre Partial Wilderness Alternative. The high degree of controversy associated with this WSA requires extensive public input and further analysis on these competing and mutually exclusive land uses. [State of Utah]

**19.10 RESPONSE:** The conflicts recognized in the comment are discussed in the Final EIS. Full analysis of the reservoir proposal and its feasibility would be required before a decision to allow construction could be made. Construction could not be allowed unless Congress decided to release the WSA from wilderness review.

**19.11 COMMENT:** There are several plant species found in Zion National Park that are proposed for endangered and threatened status. There is a high likelihood that one or more of these may occur in the Parunuweap Canyon or Canaan Mountain units, as well as others. These plants include: Erigeron religiosus, Erigeron sionis, Eriogonum corymbosum var. matthewsiae, Eriogonum jamesii var. rupicola, Eriogonum

zionis, Heterotheca jonesii, and Penstemon humilis var. obtusifolius. [National Park Service]

**19.11 RESPONSE:** The comment is not correct in the assertion that several plant species located in Zion National Park are proposed for threatened and endangered status. Of the seven species identified in the comment, only two species (Erigeron sionis and Heterotheca jonesii) are currently listed as Category 2 candidate species by the FWS (50 CFR 17). Neither of these species have been proposed for listing as either threatened or endangered, nor are they likely to be proposed in the foreseeable future. A Category 2 candidate species is a species ". . . for which information now in the possession of the Service indicates that proposing to list them as endangered or threatened species is possibly appropriate, but for which substantial data on biological vulnerability and threat(s) are not currently known or on file to support the immediate preparation of rules" (50 CFR 17). The remaining five species listed by the commenter are currently listed as Category 3C species by the FWS (50 CFR 17). Category 3C species are species ". . . that have proven to be more abundant or widespread than was previously believed and/or those that are not subject to any identifiable threat." Presently, there is only one species in Utah formally proposed by the FWS for listing. This species, Lepidium barnebyanum, is located in Duchesne County, Utah.

Consultation with FWS has taken place during preparation of the EIS (see Appendix 4 for details). As discussed in detail in both the Draft and Final EISs, no listed or proposed listed plant species are known to occur in either the Parunuweap or Canaan Mountain WSAs. However, four Category 2 candidate species are likely to occur in these WSAs. They are Asplenium andrewsii, Erigeron sionis, Heterotheca jonesii, and Sphaeromeria ruthiae. It is recognized that as additional studies are completed, this list will change. Further, it is important to note that BLM policy is to manage Category 1 or 2 candidate species, State-listed species, or any species that BLM feels is in danger in such a manner that the need to list these species does not arise. BLM will not take any actions to threaten the existence of these species, regardless of wilderness designation or nondesignation (see BLM Manual 6840 for details).

**19.12 COMMENT:** The EIS statement regarding the Washington County Water Conservancy District's proposed reservoir fails to discuss the benefits flowing

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)**

from the construction of a dam. These include significantly reduced soil erosion and elimination of the existing uncontrolled downstream flooding damage. Control of these situations would significantly improve water quality for all downstream users. [Washington County Water Conservancy District]

**19.12 RESPONSE:** The Draft EIS stated that the reservoir would stabilize flow and probably improve water quality in the river. Further analysis of the reservoir would be done in an independent study for the reservoir if formal application were made for construction of the dam. The Final EIS assumes that the dam is not likely to be built because of existing constraints.

Also, see the responses to General Comments 14.18 and 24.13.

**19.13 COMMENT:** There is a proposed reservoir development on the East Fork of the Virgin River, a tributary which yields (primarily in the high spring flows) in excess of 40,000-acre feet a year. There are several sites in that area for which preliminary work by geologists and engineers indicates a reasonable cost of development per acre foot. The EIS is totally deficient in analyzing the inability to develop those in the future--the cost to the people in Washington County and this State. [Washington County Water Conservancy District]

**19.13 RESPONSE:** See the responses to Specific Comment 19.12 and General Comments 14.2 and 14.15.

**19.14 COMMENT:** A Parunuweap wilderness is also crucial to the protection of water resources in Zion National Park. Water quality, fisheries (including the endangered Woundfin minnow), riparian vegetation, and the quality of visitors' experience in Zion National Park are all dependent . . . on maintaining instream flows. Wilderness designation would help guarantee that protection. [National Parks and Conservation Association]

**19.14 RESPONSE:** Wilderness designation of the Parunuweap Canyon WSA would not appreciatively affect the ability of NPS to maintain instream flows in Zion National Park since NPS has reserved water rights of an early priority. Any upstream developments would have to be compatible with the purposes for which Zion National Park was reserved.

**19.15 COMMENT:** BLM should continue to oppose the proposed dam for this canyon. St. George, the city that wants to build the dam, has sufficient water to meet its current and realistic future needs. [Sierra Club, Cache Group]

**19.15 RESPONSE:** BLM has not opposed, approved, or disapproved the proposed dam on the East Fork of the Virgin River, and will not make any determinations until an official application has been received and the necessary NEPA compliance and feasibility studies are completed. BLM's Proposed Action for the Parunuweap Canyon WSA is a 17,888-acre Partial Wilderness Alternative. If Congress were to accept this alternative, or the All Wilderness Alternative, the reservoir could not be constructed in the wilderness area without special approval of the President of the United States. BLM assumes that construction of the dam and impoundment of water in the WSA would not be possible.

Also, see the responses to Specific Comments 19.14 and 19.23.

**19.16 COMMENT:** We agree with the conclusion that oil and gas resources in WSAs will be essentially foregone under the so-called Proposed Action. Specifically, our company concludes that inclusion of the following WSAs would adversely affect potential hydrocarbon exploration and development: Canaan Mountain, Parunuweap Canyon, Moquith Mountain, Pariahackberry, Wahweap, Burning Hills, and Fifty Mile Mountain.

Enclosed is a geologic overview and critique of the Greater Kaiparowits Basin in southern Utah. This report was prepared by Daniel D. Tisoncik, Senior Staff Geologist, Champlin Petroleum Company. His report cites the 21-million-barrel Upper Valley field in Garfield County. [Champlin Petroleum Company]

**19.16 RESPONSE:** BLM has reviewed and updated the mineral information for the Final EIS. The review indicates that there is a low degree of certainty that small deposits for oil and gas and a moderate to high degree of certainty for large deposits of uranium and small deposits of coal in the WSA.

The reference provided in the comment was considered in development of the mineral ratings. BLM does not project any economic development of minerals in the WSA in the foreseeable future.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)**

See the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5 for a discussion on analysis assumptions and updating of mineral information for the Final EIS.

**19.17 COMMENT:** The EIS does not reflect the benefits of hydroelectric output associated with either a 35,000- to 40,000-acre-foot reservoir or a reservoir which is used in connection with the hydroelectric facilities now in place. The EIS also ignores future hydroelectric facilities that may be constructed in connection with the Quail Creek project. The ability to coordinate releases and impoundments between two projects will greatly increase the efficiency, output, and profitability of the Quail Creek hydroelectric project. [Washington County Water Conservancy District]

**19.17 RESPONSE:** The hydroelectric potential of the canyon is noted in the EIS. The information supplied in the comment has been added to the Affected Environment section in the EIS.

**19.18 COMMENT:** Statements in several of the WSA descriptions such as "No other threatened or endangered species are known to occur in the WSA" may be misleading if they cannot be supported with actual survey data. We believe this should be verified because many of the WSAs adjacent to Zion National Park are ideal peregrine falcon habitat. These units include Parunuweap Canyon, Canaan Mountain, Deep Creek, Orderville, and Spring Creek Canyon. [National Park Service]

**19.18 RESPONSE:** The discussions of threatened and endangered species have been updated and revised in the Vegetation and Wildlife sections of the Final EIS.

**19.19 COMMENT:** The four major habitats support a diverse wildlife population, including cougar, bald eagle, and 130 more wildlife species. BLM recommends only the canyon bottom and walls for designation. Deleted is the critical habitat for wildlife on the benches.

BLM ignores the benefits to the area as a whole and the importance of protecting the habitat. [Utah Wilderness Coalition]

**19.19 RESPONSE:** Much of the area within BLM's Proposed Action is not canyon bottoms and walls, but gentle hills or flats. For example, the area north of the East Fork of the Virgin River is critical deer win-

ter range. This habitat is within the proposed wilderness area.

**19.20 COMMENT:** The "Old West" setting that most "outdoor" people desire to maintain and enjoy is not a wilderness devoid of all domestic animals but a combination of wild and domestic species on the range. Considerable research has shown that wild and domestic species tend to complement each other in types of plants grazed, thus benefiting the range. [Barracks Ranch]

Some of our concerns are the following factors related to designation of the Parunuweap Canyon WSA as a wilderness area. Most of these have already created problems because of the WSA status.

- (1) Range improvements not allowed.
  - (a) Brush removal.
  - (b) Reseeding.
  - (c) Establishment of well or water catchments. These are needed to properly control grazing patterns.
- (2) No access to range with vehicles for fence repair, sick animal removal, livestock trail improvement or salt distribution. An existing jeep trail shown on older BLM maps is apparently being ignored.
- (3) No assurance for approval of additional needed fencing to control distribution of grazing.
- (4) No assurance of continued grazing permit.
- (5) Potential threat to upstream water rights for private land.

**19.20 RESPONSE:** The EIS analyzes the effects of wilderness designation on livestock grazing and management in the WSA. The specific actions that would and would not be allowed are explained in the Description of the Alternatives section and Appendix 1 in Volume I.

Land treatment would not be allowed following designation, but livestock grazing and range development maintenance would continue, possibly in the same manner as presently being used. Additional development could be allowed if consistent with

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)

wilderness management and livestock grazing objectives (i.e., additional fencing).

Upstream water rights in existence at the time of wilderness designation would not be affected. See the response to General Comment.

**19.21 COMMENT:** The EIS indicates that the scenic values are equivalent to those found in Zion National Park. The experience of hiking in a narrow canyon can be obtained within a few miles from Parunuweap in Zion Park in the famous Zion Narrows. With a reservoir, the landscape views would still be available and could be viewed from the water by more citizens. [Washington County Water Conservancy District]

**19.21 RESPONSE:** The EIS analysis indicates that the reservoir would probably not meet the VRM Class II objectives for the area, and would not be consistent with the values for which the Parunuweap Canyon WSA would be designated as wilderness. The contribution of the WSA to diversity (i.e., canyon systems) of the NWPS is analyzed in the Final EIS.

**19.22 COMMENT:** The EIS identifies backpacking as a major activity; however, it glosses over the fact that access to Parunuweap Canyon through Zion Park requires permission of a private landowner. This landowner has often placed restrictions on canyon access. Most of the recreation visits to this area would be reduced if such access were more fully restricted by this private landowner. [Washington County Water Conservancy District]

**19.22 RESPONSE:** The EIS states that the East Fork of the Virgin River is not one of the more significant use areas because normal access in and out of the river is across private land.

**19.23 COMMENT:** As I recall in 1984, there were 24 people who got permission to go through the Parunuweap area; less than that got permission from the adjacent landowners to trespass his area or to go through it with permission. A reservoir in that area would not only back up approximately 40,000-acre feet of water, but would extend nearly 7 miles in length. If you look at the recreation use of Quail Creek Reservoir (which amounts to literally thousands of people a week), a reservoir at Parunuweap would bring into that area (which is to some extent economically not as well off as other areas of our State in western Kane County and eastern Washington County) a substantial amount of recreational use in addition to

providing flood control and future culinary water to the citizens of Washington County. [Washington County Water Conservancy District]

**19.23 RESPONSE:** The Draft EIS acknowledged that large increases in water based recreation would result with the construction of the reservoir, along with flood control, culinary water, and enhancement of hydroelectric generation. However, there are many problems associated with the reservoir that may prevent construction with or without wilderness designation. These problems include reserved water rights for Zion National Park, protection of endangered fish in the Virgin River, and the effect on visitor use at Zion National Park. These problems are also introduced in the Final EIS; however, any decisions on the construction of the reservoir could be made only after NEPA review of the reservoir project and Congressional release of the WSA from wilderness review.

**19.24 COMMENT:** The description of solitude in benches is not consistent. "Elephant Cove does not exhibit the topographic or vegetative screening necessary to provide outstanding opportunities for solitude" (Volume III-A, Page 22). But, the Draft EIS also states "hunting is fair to poor throughout the area due to dense tree cover" (Volume III-A, Page 21). It appears that BLM has sadly blundered through these WSAs, lacking the objectivity and insight that is needed to report accurately to Congress. [Kim Jennyson]

**19.24 RESPONSE:** See the responses to Specific Comment 19.9 and General Comment 22.5.

**19.25 COMMENT:** The Draft EIS has greatly underestimated the outstanding opportunities for both recreation and solitude in the Parunuweap Canyon WSA. Simply because some areas are flatter or offer somewhat less vegetation does not necessarily mean that opportunities for solitude are lessened, especially when these areas are essentially "islands" of level terrain or open vegetation surrounded on most sides by rugged topography and vegetative screening.

Furthermore, the WSA is large enough that any open spaces enhance the feeling of lonely spaciousness and solitude. This area easily offers as outstanding opportunity for a wide variety of recreation as similar areas within the adjacent national park. Because it is less well known, the chances for solitude are generally greater than many areas within the park. As stated before, this area is a logical exten-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)**

sion of wilderness within the park deserving protection for reasons already stated for other areas adjacent to Zion National Park. [Michael Van Note]

**19.25 RESPONSE:** See the response to General Comment 22.5 concerning the rating of wilderness values and Appendix 11, which summarizes rationale for BLM's Proposed Action.

**19.26 COMMENT:** I support the All Wilderness Alternative for Parunuweap Canyon. The area south of the canyon omitted in the Partial Wilderness Alternatives adds diversity to the area and has outstanding wilderness characteristics. Small-scale topographic features offer much more screening than acknowledged in the Draft EIS. I disagree with the final paragraph of the Primitive and Unconfined Recreation section (Page 23). The hike down the main canyon certainly qualifies as rare and unusual when viewed from a national perspective. The balance of the section clearly identifies multiple (two or more) outstanding recreation opportunities. [John Veranth]

**19.26 RESPONSE:** The EIS fully explains the rationale for the determinations on the extent of outstanding opportunities for solitude and primitive and unconfined recreation. Backpacking through the canyons of the WSA is recognized as an outstanding opportunity for primitive recreation. The diversity of recreational opportunities in the WSA is recognized in the Final EIS, but only backpacking is considered to be outstanding by BLM. Also, see the responses to General Comments 22.3 and 22.5.

**19.27 COMMENT:** Your alternative will simply not protect the wilderness integrity of the area. The idea of allowing massive tree cutting and chaining and ORV use right at the edge of Parunuweap Canyon, by opening up the 12,500-acre Elephant Cove, Harris Mountain, and Rock Creek area is absurd and makes the use of the term wilderness a joke. No one goes to a wilderness to see clear-cuts and hear chainsaws and ORVs. You yourself admit "the sights, sounds and emissions of activities within the area (Elephant Cove) could result in loss of solitude and primitive recreational values within the designated portion." It also seems clear (to me at least) that all conflicting resources are less significant than wilderness. [Sara Irving]

**19.27 RESPONSE:** The Draft EIS projected that mineral and energy development in the nondesignated portion of the WSA could impair solitude and primitive recreation values in the portion that would be desig-

nated. Any loss of solitude to ORV noise, wood-gathering activities, etc., would only be short term in nature. As discussed in the response to Specific Comment 19.16, mineral data and analysis assumptions have changed for the Final EIS, and no mineral-related disturbance is projected in the foreseeable future.

**19.28 COMMENT:** The conclusion in the Draft EIS that solitude is found only in 57 percent of the area (mainly Parunuweap Canyon proper) is quite wrong. The area in Elephant Cove and similar side canyons is used only infrequently and solitude is abundant. This statement only reflects BLM's ignorance of the area. Similarly, the Draft EIS states the WSA offers no "rare, unusual, or otherwise notable recreation activities." What nonsense! There are few, if any, areas that offer the kind of backpacking experience found in Parunuweap Canyon with its deep pools, swift falls, and difficult traverses. I sincerely doubt those who wrote these comments have made this trip. It is difficult to imagine a more unique and notable activity than the 3- to 4-day backpack from the trailhead to lower Zion National Park. [Jack Spence]

**19.28 RESPONSE:** The canyon areas in the WSA are recognized as having outstanding opportunities for solitude and are included in BLM's Proposed Action. See the response to General Comment 22.5 for information on rating of wilderness values.

**19.29 COMMENT:** An overemphasis was placed on screening as the requirement for solitude. This WSA's size is an important factor in determining solitude. [Owen Severance]

**19.29 RESPONSE:** Both size and screening are features required by inventory guidelines to evaluate an area's opportunities for solitude. See the responses to General Comments 22.3 and 22.5.

**19.30 COMMENT:** Notwithstanding the importance of protecting the East Fork of the Virgin, the 14,100-acre Partial Wilderness Alternative falls far short of what should be recommended as wilderness. There are simply no sound reasons for excluding the rest of the unit. The Draft EIS notes that mineral values in the south, which is largely excluded, are very low (f2/c1), and that "The probability of development in the WSA is low even for the more favorable area" (the included portion). The logic of the Proposed Action is again in jeopardy because of the recommendation of over 16,000 acres as nonsuitable. The recommendation exhibits a canyon-stream fixation. It

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)**

appears as if the unparalleled quality of Utah's canyon-stream systems has masked the ability to properly judge other forms of desert wilderness. The conclusion there are only isolated pockets in the nonrecommended portions having outstanding solitude or primitive recreation opportunities is wrong. [Utah Wilderness Association]

The proposal excludes the top of the Block Mesas. The forested mesa tops rise above the land below. Various points extend into the lower landform. The geological separation of the mesa tops from the land below provides outstanding opportunities for solitude. But the Draft EIS only mentions the point which extends deep into Elephant Cove as providing outstanding opportunities for solitude. The mesa tops also offer stunning views of the unit. They are worthy destinations in their own right.

The Draft EIS method of evaluating wilderness values or parcels in piecemeal fashion is inappropriate and misleading. Failure to judge land in context as part of a unit as a whole is an arbitrary and capricious way of making wilderness decisions. It distorts reality and has led to a distorted decision in this case.

**19.30 RESPONSE:** See the response to General Comment 22.5.

**19.31 COMMENT:** The section in the Draft EIS concerning special features fails to mention the fact the canyon was apparently first traversed by John Wesley Powell, and a plaque commemorating his passage is found on the boundary of Zion National Park above the large waterfall. [Jack Spence]

**19.31 RESPONSE:** The plaque referred to in the comment is of historical interest, but does not constitute a special feature under BLM's wilderness study guidelines.

**19.32 COMMENT:** Page 23, Special Features: Are there threats to the Foote Ranch Road if the wilderness alternative is not followed? [State of Utah]

**19.32 RESPONSE:** Under BLM's Proposed Action, approximately 7 miles of ways, which includes a part of the Foote Ranch Road, would be closed to ORV use. The No Action/No Wilderness Alternative would allow historic use of the 16 miles of ways within the WSA. This information is found in the Descriptions of the Alternatives in the individual analysis of the Parunuweap WSA (Volume III-A).

**19.33 COMMENT:** This area is important to the integral protection of nearby Zion National Park. This issue has not been adequately addressed in the Draft EIS. [Sierra Club, Cache Group]

**19.33 RESPONSE:** The complementary association between Zion National Park and the Parunuweap Canyon WSA is discussed in the appropriate sections (i.e., recreation, wilderness values, water resources etc.). Also, see the response to Specific Comment 19.34.

**19.34 COMMENT:** One reason Parunuweap and Canaan Mountain should be discussed together is that they form one large contiguous wilderness area when combined with NPS's recommendation for Zion. Another reason why they should be considered together is that they add needed wilderness to Zion. Utah's parks are small. Adding the State's five parks together results in a total acreage about equal to Yosemite, and less than Glacier, Olympic, or Grand Canyon. Utah's parks are also riddled with roads of one type or another. Zion is typical of Utah's parks. It is basically a park for the dayhiker and the windshield tourist, though a few overnights are possible if one works at finding unusual routes. Geologically, Parunuweap and Canaan Mountain are part of Zion, and they give the park needed wilderness. [David Jorgensen]

The importance of preserving the East Fork of the Virgin to Zion National Park cannot be overemphasized. Virtually everyone who uses the portion of Parunuweap located in the park begins from Foote Ranch or other access points within the WSA. Except for a legal line, the East Fork of the Virgin in the WSA is part of the park. The quality of the wilderness experience within the park depends on wilderness outside the park. The damming of the East Fork of the Virgin outside the park would destroy the wilderness value of the East Fork of the Virgin inside the park as well. Such a national tragedy must be avoided.

**19.34 RESPONSE:** The relationship of the WSAs to Zion National Park is analyzed in the EIS. Canaan Mountain and Parunuweap Canyon are considered together under the Large Cluster Concept Alternative in Volume I of the Draft EIS. However, the two WSAs and the connecting portion of Zion National Park did not meet the size criteria for the Small Cluster Alternative analyzed in detail in Volume I.

**19.35 COMMENT:** The section points out the landlocked status of Parunuweap Canyon, thereby

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 19: PARUNUWEAP CANYON WSA (CONTINUED)**

restricting current access of backpackers into the canyon area. It accurately reflects the policy of Kane County of encouraging multiple use of the land. This policy appears to conflict with BLM's Proposed Action. The statement: "There are no recorded rights-of-way, easements, or grants of any type within the WSA's boundary," is misleading. There are a number of roads which appear on the map on Page 7, Volume III-A, Parunuweap Canyon WSA. Moreover, it is the policy of Kane County that these are public roads. Under Utah law, many roads become public roads by means of unrecorded prescriptive easements. Finally, the EIS fails to consider the extent to which these "public roads" are traveled. (See Exhibit "C" attached hereto, which is a map of the public roads in the subject areas.) Several of these roads provide complete direct access to the reservoir sites in the bottom of the canyon. [Washington County Water Conservancy District]

**19.35 RESPONSE:** There are two cherry-stemmed roads in Parunuweap Canyon WSA. Other access routes do not meet the Federal definition of roads, and, therefore, are considered ways. These ways are currently open to vehicle use, but would be closed in any areas designated as wilderness. See the responses to General Comments 4.1 and 4.2 which discuss the definition of a road.

The Wilderness Study Policy (BLM, 1982b) requires BLM to consult with local governments and provide information to Congress concerning consistency with other land use plans; however, consistency with other plans is only one of the criteria for establishing the suitability of an area for wilderness designation.

**19.36 COMMENT:** For the Parunuweap Canyon WSA, either the All Wilderness or the Large Partial Wilderness Alternatives would afford the benefit of congruous NPS/BLM management. The net effect would be greater protection of the Virgin River through Parunuweap Canyon. The NPS/BLM users of both areas are typically one and the same. A similar situation exists for the Canaan Mountain WSA where either the All Wilderness or the preferred Partial Wilderness would be compatible with park management. However, the All Wilderness Alternative would enhance and protect primitive wilderness opportunities in the Transview Mountain area in Zion National Park by limiting possible ORV access. [National Park Service]

**19.36 RESPONSE:** The Parunuweap Canyon WSA is not adjacent to the Transview Mountain area of the park and would have little effect on ORV access to that area. The complementary nature of wilderness designation and NPS management of Zion National Park is described in the EIS.

**19.37 COMMENT:** The EIS's socioeconomic analysis of the project has been related solely to Kane County. Nevertheless, the primary socioeconomic impact of creating the Parunuweap WSA would be in Washington County, not Kane County. Although the proposed Parunuweap reservoir site is geographically located in Kane County, the terrain in which it is located renders its direct water usage by Kane County residents a nullity; in contrast, the project will dramatically impact Washington County. [Washington County Water Conservancy District]

**19.37 RESPONSE:** The Draft EIS recognized that there would be economic benefits derived from construction of the reservoir and noted that any economic benefits related to the reservoir would not be realized with wilderness designation. However, the reservoir is not likely to be built because of existing constraints. Reference to Washington County as an impacted area has been added to the Final EIS.

**19.38 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**19.38 RESPONSE:** See the response to General Comment 14.27.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 20: CANAAN MOUNTAIN WSA

**20.1 COMMENT:** Previous to the Draft EIS, the acreage for this WSA was listed as 53,600 acres but is now listed as 47,170 acres. Why is there a discrepancy? This apparent contradiction needs an answer. [Utah Wilderness Association]

**20.1 RESPONSE:** The acreage figure for the WSA has changed because a portion of the original WSA was designated as part of the Cottonwood Point Wilderness in the Arizona Wilderness Act of 1984. This is explained in the Land Use Plans and Controls section of the Affected Environment in the Final EIS.

**20.2 COMMENT:** In the Partial Wilderness Alternative the map (Page 8) is unclear regarding the area near The Beehive in Section 15 and Section 24. Is this area in or outside of the proposed wilderness? [Ray Wheeler]

**20.2 RESPONSE:** The Beehive and ridges and plateaus in T. 43 S., R. 10 W., secs. 13 and 24 have been included in BLM's partial wilderness proposal. The canyon bottoms and cliff walls up to approximately 5,600 feet in elevation have been excluded from the alternative in those two sections.

**20.3 COMMENT:** Page 1, Paragraph 1: The acreage of State in-holdings (3,250 acres) does not include the cornered in-holding wrongly excluded on Map 1 (Page 4) and is inconsistent with acreage indicated on Page 3 for the No Action Alternative. State in-holding acreage should be approximately 3,890 acres. The same comment is applicable to Page 5, All Wilderness Alternative. [State of Utah]

Page 4, Map: Two State in-holdings, T. 43 S., R. 10 W., sec. 2 and T. 43 S., R. 9 1/2 W., sec. 32 are not shown.

Page 6, Map: The WSA boundary wrongly excludes the cornered State in-holding.

Page 8, Map: Why is the WSA boundary in T. 43 S., R. 10 W., sec. 2 drawn as shown? Is Section 2 State land?

Page 21, Paragraph 4: State land acreage is approximately 3,890 acres.

**20.3 RESPONSE:** The State lands in T. 43 S., R. 11 W., sec. 2 and T. 43 S., R. 9 1/2 West. sec. 32 have

been added to the maps and included with the WSA. Acreage figures have been revised in the text.

The land in T. 43 S., R. 10 W., sec. 2 is public land administered by BLM. There is a total of 3,249 acres of in-held State land within the WSA.

Also, see the responses to General Comments 6.3 and 23.10 for a discussion of the State's position on the exchange of in-held State lands.

**20.4 COMMENT:** BLM implies in the EIS that proposed vegetative treatments and other projects, totaling 1,300 acres, are reasons for the Partial Wilderness Alternative. Yet the amount of acreage deleted in BLM's recommendation is 11 times greater than the affected acreage. This vast omission seems arbitrary and frivolous because thousands of omitted acres will remain pristine and unaffected by the actions--acreage BLM maintains has high wilderness quality. For example, these proposed developments do not account for the omission of Horse Valley and The Pines in the northeast corner of the WSA. Horse Valley contains a perennial stream and, in The Pines, the cliff rises 1,400 feet to the plateau above, a view labeled as "spectacular" in the EIS. [Utah Wilderness Association]

**20.4 RESPONSE:** The Partial Wilderness Alternative was developed to either eliminate or reduce resource conflicts. The boundary is similar to the old primitive area proposal, but is larger by about 3,500 acres. This enlargement occurs in the Broad Hollow and South Creek areas.

Boundary adjustments for the Partial Wilderness Alternative were used in the Smithsonian Butte area on the north and west sides to eliminate areas without outstanding solitude. Generally, these areas lack vegetative and topographic screening.

The Pines and Horse Valley areas were reduced in size to eliminate private in-holdings. The boundary was adjusted back in the Broad Hollow area to eliminate areas with less than outstanding opportunities for solitude and to leave an area open for expansion of range improvements.

The south drainage areas of Squirrel, Water, and Maxwell Canyons were adjusted because of existing springs developed for culinary and irrigation water for the communities of Hilldale and Colorado City.

**SPECIFIC COMMENT RESPONSE**  
**SECTION 20: CANAAN MOUNTAIN WSA (CONTINUED)**

Likewise, the Canaan Ranch area was adjusted to allow for development and maintenance of springs. Spring developments would also cause manageability problems in these areas.

Appendix 11 summarizes the rationale for BLM's Proposed Action.

**20.5 COMMENT:** Back when BLM was contemplating establishing a primitive area at Canaan Mountain, the Cedar City District put out a fine map showing the plateau, the cliffs, and a proposed boundary. I included that map with my comments on the scoping documents and am attaching another copy to these remarks. I feel that these boundaries are very adequate for protecting the wilderness resource without causing undue hardship on the local residents and their current needs. In fact, I think this proposal is the best compromise to the All Wilderness Alternative. Your Partial Wilderness Alternative is deficient in a number of respects. The most serious problem is along the eastern boundary, where the large westward drift to eliminate Section 36 cuts too far into the plateau proper. Along the south boundary you cut out all of Water Canyon and Squirrel Canyon, which contain important access trails to the plateau. These trails from the end of the jeep trail should be in the wilderness without question. The western and northern boundaries are mostly acceptable with the exception of the huge jogs which completely isolate Smithsonian Butte from the rest of the wilderness, an unacceptable circumstance, and the elimination of South Creek from the wilderness. Without South Creek inside the boundaries, the Eagle Crags area of the plateau, while itself wilderness, is surrounded on three sides by lands open to development. As the Eagle Crags are one of the wilderness' most spectacular features, the boundary needs to be more generous in this area. Your boundary problems with this WSA are caused by an understandable but misguided attempt to eliminate State and private land sections from the wilderness boundary. The law allows the inclusion of such land within the wilderness. The status of such land, of course, is not affected by such inclusion, but if the lands were later acquired by the Federal government, they would become wilderness automatically without further Congressional action. Such would not be the case under your proposal. [Robert Hassell]

In short, the proposed Partial Wilderness Alternative has too many problems to be acceptable. I suggest the adoption of the boundaries in the old prim-

itive area proposal or adoption of the All Wilderness Alternative.

**20.5 RESPONSE:** See the response to Specific Comment 20.4, which discusses rationale and to General Comments 6.3 and 6.4, which address State lands as part of the wilderness review.

**20.6 COMMENT:** The Utah Wilderness Association's proposal excludes terrain in lower South Creek which would allow for reservoir development while retaining the upper portion of South Creek Canyon. This region contains side canyons, thick riparian vegetation, and scenic views that BLM admits in the EIS and in the technical report as giving the area outstanding opportunities for both solitude and primitive recreation. The EIS refers to South Creek as the largest canyon in the WSA, with deep narrow sections and a waterfall in one of the tributaries. The EIS also notes: "Backpacking is possible in most of the South Creek Canyon basin." Since the EIS identifies backpacking as the most area-extensive of all of the activities identified as being of outstanding quality, this area clearly possesses outstanding wilderness values by BLM's own admission. [Utah Wilderness Association]

The upper forks of Short Creek, all the way to The Beehive, have been excluded in BLM's Partial Wilderness Alternative even though the water development is situated well downstream. BLM notes in the EIS that the canyons are generally deep, narrow, and vegetated and, therefore, offer an outstanding opportunity for solitude. In addition, BLM says: "The entire Short Creek-Squirrel Canyon system is favorable for backpacking."

There is no reason given for the acreage deletions around Eagle Crags and Smithsonian Butte. BLM notes that the cliffline circling the WSA has extensive rugged topography and offers outstanding opportunities for solitude. Again, areas with high wilderness values are omitted from the recommendation even though no conflicts exist.

The Utah Wilderness Association's proposal resolves resource conflicts and eliminates impacts while retaining the integrity of the entire Canaan Mountain region. BLM has made a good start but needs to adopt a proposal that includes those areas with high wilderness values and no resource conflicts detailed in this comment.

**SPECIFIC COMMENT RESPONSE**  
**SECTION 20: CANAAN MOUNTAIN WSA (CONTINUED)**

**20.6 RESPONSE:** See the response to Specific Comment 20.4 and Appendix 11 in Volume I, which explain the rationale for the BLM Proposed Action.

The Utah Wilderness Association's proposal was considered but not analyzed in detail. Also see General Comment Responses 3.7 and 3.8.

**20.7 COMMENT:** Why exclude the cliff faces? By withdrawing the boundary to the plateau top, the cliffs and all low-lying areas are left open to any development the local government wants. A road, perhaps, to the top? Part of the area's wilderness feel depends on its isolation and difficulty of access. [Kim Clegg]

**20.7 RESPONSE:** BLM's Proposed Action (Partial Wilderness Alternative) boundary was drawn along the base of the cliffs (bottom of the talus slopes). An exception to this was in Water Canyon, Squirrel Canyon, and Maxwell Canyon where the boundary was drawn to eliminate conflicts with culinary water developments for the town of Hildale.

Also, see the response to Specific Comment 20.4 and Appendix 11 in Volume I, which provide rationale for BLM's Proposed Action.

**20.8 COMMENT:** The top of this high cliff area contains thousands of acres that meet every wilderness criteria. It sits high above all civilization in its wide, highly scenic, primitive setting. Solitude is the dominant factor. It is practically impossible for development to endanger this broad "wilderness in the sky" in any way. Canaan Mountain will be wilderness whether we say it is or not. [Hildale Town Corporation]

The problem arises when the designated wilderness area plummets over the high cliffs, across low rolling foothills, publicly used low canyons, flood control plains, developed and undeveloped springs and reservoirs, roads and accesses, and crowds right into the fast-growing community of over 3,000 people in Hildale.

The designated wilderness area stays on top of Canaan Mountain with the high cliffs as the natural barrier, which they are. Different maps developed by BLM show different boundaries. Some follow survey lines, others follow contour lines. We say follow the natural contour lines all the way. Keep this line high on the face of the cliffs and other high points so there is no encroachment on spring developments and other

necessary uses. Compare the map in the Wilderness Draft EIS, Volume III, Page 8, Canaan Mountain WSA, with the enclosed map which BLM, St. George office, originally developed and gave to us. A close examination around Hildale reveals differences which could affect a very important spring development at the base of the cliffs. The other enclosed map shows the contour line at a 6,200-foot elevation. This would be preferred. A 6,000-foot elevation contour should be the lowest allowed.

**20.8 RESPONSE:** See the responses to Specific Comments 20.4 and 20.7

**20.9 COMMENT:** In 1983, BLM granted a temporary right-of-way to a private individual who claimed need for a reservoir in South Creek for irrigation purposes of this private land. Engineers designed the project so that the dam was outside the WSA, although water would flood into the WSA. This reservoir would have to have been drained if and when the area became wilderness under the agreement. Geologic conditions prevented the dam from working. The engineers then designed a larger dam upstream entirely inside the WSA; BLM wisely denied the permittee a right-of-way. [Del Smith]

Now for the first time in the Draft EIS, BLM is recommending a boundary change to allow such a project to be built. In their SSA, BLM states the area represents a high quality area for hiking opportunity and backpacking is limited to areas accessible within a day's time. Backpacking is possible in most of the South Creek Canyon basin. In the Draft EIS, Volume III-A, Page 20, it states: "South Creek Canyon is the largest canyon in the WSA. It possesses a perennial stream, vegetation characteristic of a north-facing canyon, and deep narrow sections in the upper reaches. Waterfalls are present in a tributary canyon below the lower mountain." On Page 14 of this document, BLM addresses a reservoir permit. "The applicant has decided to hold the original grant until Congressional decision, and it is doubtful that the reservoir will be built as presently granted."

In light of this, BLM should change the current Draft EIS recommendation and return the WSA boundary back to its original inventory boundary. The South Creek drainage qualifies as wilderness in its entirety clear down to State Section 16.

**20.9 RESPONSE:** BLM has enlarged the boundary of the Partial Wilderness Alternative to include the



**SPECIFIC COMMENT RESPONSE**  
**SECTION 20: CANAAN MOUNTAIN WSA (CONTINUED)**

South Creek drainage down to T. 42 S., R. 10 W., sec. 16. This addition increases the size of the Partial Wilderness Alternative (BLM Proposed Action) by about 1,000 acres.

**20.10 COMMENT:** The real reasons for eliminating any of the acreage are to allow development for stock and marginal irrigation. Given the low economic value of such developments for a depressed and weak industry, it is irrational to delete some of the finest wilderness in this country for projects which will benefit no one. There is absolutely no reason for attempting to increase grazing numbers or provide irrigation for marginal land on a WSA of this wilderness quality, particularly when the attempt will fail and will waste taxpayers' money. The Department of Agriculture is trying to decrease the use of marginal land; it thus makes no sense to build a reservoir to encourage it, and destroy prime wilderness at the same time. [Jack Spence]

**20.10 RESPONSE:** See the responses to Specific Comments 20.9, 20.18, and 20.25.

**20.11 COMMENT:** The high quality wilderness values present in the WSA are all retained in the 32,800-acre Partial Wilderness Alternative. This alternative eliminates most conflicts except a potential uranium resource. Also, oil company reports indicate moderate potential for economic accumulations of hydrocarbon reservoirs. Small oil fields, the Virgin field and Anderson Junction field, are nearby. In addition, the town of Hildale gets some of its public water supply from the WSA. [State of Utah]

Wilderness management for this WSA would complement and enhance adjacent Zion National Park values. Canaan Mountain WSA is also adjacent to Cottonwood Point Wilderness Area. Overall, the negative impacts of the Partial Wilderness Alternative are low.

**20.11 RESPONSE:** See the responses to Specific Comments 20.4 and 20.14.

**20.12 COMMENT:** There are several plant species found in Zion National Park that are proposed for endangered and threatened status. There is a high likelihood that one or more of these may occur in the Parunuweap Canyon or Canaan Mountain WSAs, as well as others. These plants include: Erigeron religiosus, Erigeron sionis, Eriogonum corymbosum var. matthewsiae, Eriogonum jamesii var. rupicola, Eriogonum

zionis, Heterotheca jonesii, and Penstemon humilis var. obtusifolius. [National Park Service]

**20.12 RESPONSE:** See the response to Specific Comment 19.11.

**20.13 COMMENT:** The inclusion of the area beneath Canaan Mountain ledges, into the Canaan Ranch, imposes an extreme hardship on us and our ranch operation. Our springs, which have been used since 1874, lie within this area. These springs are used for domestic, stock water, and irrigation purposes. Our water system includes pipelines, dams, and ditches, all of which must be maintained. [Merlin Webb]

To include this area in the WSA seems a blow to agriculture. We certainly hope our rights can be protected by excluding them from wilderness areas. Enclosed are copies of our diligence claims, spring numbers, and locations for seven springs. The springs are all collected and conveyed to privately owned property.

**20.13 RESPONSE:** See the response to Specific Comment 20.4. The EIS notes that seven springs are proposed for development for livestock use, and the effects of each alternative are analyzed.

**20.14 COMMENT:** We agree with the conclusion that oil and gas resources in WSAs will be essentially foregone under the so-called Proposed Action. Specifically, our company concludes that inclusion of the following WSAs would adversely affect potential hydrocarbon exploration and development: Canaan Mountain, Parunuweap Canyon, Moquith Mountain, Pariahackberry, Wahweap, Burning Hills, and Fifty Mile Mountain. [Champlin Petroleum Company]

Enclosed is a geologic overview and critique of the Greater Kaiparowits Basin in Southern Utah. This report was prepared by Daniel D. Tisoncik, Senior Staff Geologist, Champlin Petroleum Company. His report cites the 21-million-barrel Upper Valley field in Garfield County.

**20.14 RESPONSE:** BLM has reviewed and updated the mineral information for the Final EIS. The review indicates that there is a low degree of certainty for small deposits of oil and gas and a very low certainty for small deposits of coal and uranium in the WSA. The reference provided in the comment was considered in development of the mineral ratings. However, BLM does not project any economic development of

**SPECIFIC COMMENT RESPONSE**  
**SECTION 20: CANAAN MOUNTAIN WSA (CONTINUED)**

minerals in the WSA in the foreseeable future. Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5, which discuss the analysis assumptions and updating of mineral information for the Final EIS.

**20.15 COMMENT:** Statements in several of the WSA descriptions such as "No other threatened or endangered species are known to occur in the WSA" may be misleading if they cannot be supported with actual survey data. We believe this is important to be verified because many of the WSAs adjacent to Zion National Park are ideal peregrine falcon habitat. These units include Parunuweap Canyon, Canaan Mountain, Deep Creek, Orderville, and Spring Creek Canyon. [National Park Service]

**20.15 RESPONSE:** The discussion of threatened and endangered species has been revised in the Vegetation and Wildlife sections.

**20.16 COMMENT:** In the SSA, it says that Cottonwood Canyon is a flat open valley with very little vegetative screening, and the opportunity for solitude is minimal and does not provide for outstanding opportunities. And, so even the analysis says Cottonwood Canyon is not really an outstanding place for wilderness. In the Arizona Wilderness Act of 1984, the designated wilderness did leave Cottonwood Canyon allotment out and followed the rims of Cottonwood Point and Lions Point. So I would like to propose in Utah that the east boundary of Cottonwood Canyon be moved over. The east boundary is what is proposed as the Partial Wilderness Alternative. If this boundary were moved over to the west side, it would leave Cottonwood Canyon out of wilderness, and it would tie in still very nicely with what Arizona has already designated both in Lions Point and Cottonwood Point. This would leave the Cottonwood Canyon out and then we could continue our livestock operation as we have been doing for many years in the past. [Darlo Esplin]

**20.16 RESPONSE:** BLM's proposed Partial Wilderness Alternative is designed to complement the Cottonwood Point Wilderness Area in Arizona. In Arizona, both sides of Cottonwood Canyon are designated wilderness, and this is proposed to continue in Utah.

The wilderness management guidelines allow livestock grazing to continue in the area following designation. Some restrictions on the use of motorized vehicles may be imposed. See the responses to General Comments 18.1, 18.6, and 24.3.

**20.17 COMMENT:** Also, the grazing figures in the EIS are somewhat confusing. Pine Springs and Trail Well allotments are listed in the EIS but are not part of the Canaan Mountain Planning Unit. Do these allotments actually occur within the WSA? [Utah Wilderness Association]

**20.17 RESPONSE:** Only a very small portion of the Pine Springs and Trail Well allotments are within the WSA, as indicated in the EIS.

**20.18 COMMENT:** BLM fails to analyze the viability of the conflicting range improvement projects. According to the Kanab/Escalante Grazing EIS, the proposed range manipulations for the WSA seem to be quite speculative and unlikely to make significant contributions to the affected allotments. Using the SCS's Interim Guide for Rating Soils, according to their soil suitability for range seeding, two allotments (Cottonwood and Goat Ranch) were given poor success ratings and the Well Springs Allotment was only given a fair rating. BLM needs to analyze the feasibility of conflicts which cause unsuitable recommendations. [Utah Wilderness Association]

**20.18 RESPONSE:** The feasibility studies of the range improvements proposed in the Kanab/Escalante Grazing EIS have not been completed. However, these projects have passed a screening process and are considered viable by BLM. A final feasibility determination cannot be made without site engineering, which will be done when funding becomes available. The analysis of the No Action/No Wilderness Alternative and the BLM Proposed Action are based on the data available in the current land use plans.

Also, see the response to General Comment 24.5, which addresses questions on the feasibility of range improvements.

**20.19 COMMENT:** Once again, screening was improperly used as the sole determinant for the presence of solitude. The WSA should be re-evaluated using the proper definition for solitude. The EIS should show the contiguous wilderness in Arizona, which also contributes to solitude by increasing the size of the wilderness area. [Owen Severance]

**20.19 RESPONSE:** The WSA's size, particularly when considering the adjacent designated wilderness in Arizona, enhances outstanding opportunities for solitude. This is noted in both the Draft EIS and Final EIS.

**SPECIFIC COMMENT RESPONSE**  
**SECTION 20: CANAAN MOUNTAIN WSA (CONTINUED)**

**20.20 COMMENT:** I disagree completely with the statement in the Draft EIS that 10,170 acres do not meet standards for solitude. In addition to screening, which is quite adequate in these 10,170 acres proposed for deletion because of the rough terrain, solitude evaluation should take use into account. Less than 250 visitor days a year in an area this size means the chances of encountering anyone are almost zero; I saw no one, and few tracks of humans were observed during my backpacking in the area. The entire area offers outstanding solitude. [Jack Spence]

Likewise, I disagree with the statement concerning primitive recreation: ". . . 19,170 acres do not meet the outstanding opportunities . . ." This is nonsense since, for all the activities listed as primitive in the Draft EIS, outstanding opportunities exist throughout these 19,170 acres.

**20.20 RESPONSE:** It is recognized that most of the WSA has outstanding opportunities for solitude because of its size and low visitation. However, outstanding opportunities for solitude require topographic and vegetative screening in conjunction with size.

Also, see the response to General Comment 22.3.

**20.21 COMMENT:** The Washington County Commission supports wilderness designation for the portion of Canaan Mountain WSA described in the Partial Wilderness Alternative of 32,800 acres of public land. Support by local governments is contingent, however, upon the stipulation that valid existing water rights be maintained, including the access and maintenance rights for existing water developments and access to State lands. [Kurt Young]

**20.21 RESPONSE:** The position of the Washington County Commission relative to this WSA has been presented in the Final EIS. The commission supported the Consolidated Local Government Response to the Draft EIS which opposes wilderness designation for the WSA.

Also, see the responses to General Comments 14.11, 14.13, and 14.16.

**20.22 COMMENT:** It appears the "decision document" for this WSA has already been printed--the grazing EIS. The suitability decision appears to have been made in that document, contrary to the wilderness review process. [Utah Wilderness Association]

**20.22 RESPONSE:** See the responses to General Comments 2.24 and 2.26.

**20.23 COMMENT:** A proposed east/west utility corridor from Township 37 South to the Arizona border would be jeopardized with this wilderness designation. The potential major transmission corridor must be protected. [Utah Power and Light]

**20.23 RESPONSE:** The text has been changed to identify Rosy Canyon as an important utility corridor for east-west rights-of-way.

**20.24 COMMENT:** One reason Parunuweap and Canaan Mountain should be discussed together is that they form one large contiguous wilderness area when combined with NPS's recommendation for Zion. Another reason why they should be considered together is that they add needed wilderness to Zion. Utah's parks are small. Adding the State's five parks together results in a total acreage about equal to Yosemite and less than Glacier, Olympic, or Grand Canyon. Utah's parks are also riddled with roads of one type or another. Zion is typical of Utah's parks. It is basically a park for the dayhiker and the windshield tourist, though a few overnights are possible if one works at finding unusual routes. Geologically, Parunuweap and Canaan Mountain are part of Zion, and they give the park needed wilderness. [David Jorgensen]

The importance of preserving the East Fork of the Virgin to Zion National Park cannot be overemphasized. Virtually everyone who uses the portion of Parunuweap located in the park begins from Foote Ranch or other access points within the WSA. Except for a legal line, the East Fork of the Virgin in the WSA is part of the park. The quality of the wilderness experience within the park depends on wilderness outside the park. The damming of the East Fork of the Virgin outside the park would destroy the wilderness value of the East Fork of the Virgin inside the park as well. Such a national tragedy must be avoided.

**20.24 RESPONSE:** See the response to Specific Comment 19.34. The text of the Canaan Mountain analysis has been revised to indicate that designation would preserve the opportunity for extended trips in association with Zion National Park.

**20.25 COMMENT:** I am writing to correct several facts regarding the South Creek Reservoir as proposed at the present time. The essential facts which should be corrected are the following: [James Trees]

**SPECIFIC COMMENT RESPONSE**  
**SECTION 20: CANAAN MOUNTAIN WSA (CONTINUED)**

1. The surface acres of the proposed reservoir are 58 (not 100).

2. The project will irrigate 350 acres (not 200), of which 250 will be in orchards and 100 in pasture.

3. Once in operation, the proposed orchard and packing plant (which cannot exist without the irrigation) will employ 50 to 100 persons, and the entire project will involve approximately \$2 million of capital investment. The proposed operation would be the largest private employer in the eastern half of the county (NPS is probably the only larger one). In addition to the jobs provided by the operation and also those stimulated by the capital investment, the project will have a major economic effect by contributing to Federal, State, and local tax revenues.

4. In an area where water rights are particularly difficult, if not impossible to obtain, the project will create approximately 1,800 acre-feet of high water rights, which may otherwise go unused by the State.

5. Local, county, and State government agencies support the project (two letters displaying local support are enclosed). As the only user on South Creek and because the creek variously floods and nearly dries up in the summer, there are no negative environmental impacts. Some observers believe a reservoir in that location will contribute positively to wildlife. To my knowledge, the only criticism of the reservoir by anyone is the question of the boundary line of the WSA.

I am currently working with the engineers to study the possibility of some other site downstream, but because of complex geology, costs, and loss elevation or head, at the moment no other site has yet proven to be feasible.

**20.25 RESPONSE:** The reservoir has been constructed on private land in T. 42 S., R. 10 W., sec. 9 over 1 mile downstream from the WSA.

**20.26 COMMENT:** The proposed South Creek irrigation project will provide further flood control, capital spending in the eastern part of the country, and annual employment for approximately 50 people per year. The project will service the proposed agricultural area using modern techniques of water distribution and production of commercial orchards, which will aid as being a standard for others to follow. [Washington County Water Conservancy District]

The Washington County Water Conservancy District believes the project as proposed is financially feasible if a low interest-bearing loan is obtained to finance a portion of the project.

**20.26 RESPONSE:** See the response to Specific Comment 20.25.

**20.27 COMMENT:** BLM dropped natural portions of this unit (12,800 acres) that qualified for wilderness study. BLM's justification uses rationale which in other areas the IBLA has found to be in error and remanded. Two of the portions of the unit BLM deleted are not significantly impacted. The first section is the northern part of the unit just south of the town of Rockville. The second deletion is in the eastern Pine Spring portion of the unit. The BLM inventory policy requires that BLM establish that the area is significantly impacted by man's activities to justify deletion of portions of the unit from wilderness review. The northern part of the unit north of Eagle Crags near Rockville has approximately 1,800 acres removed from the study area. BLM's inventory intrusion map indicates that the intrusions occupy less than 3 acres on the west; the 0.25-mile of vehicle way that enters the area in the eastern part is deleted. This legal description deletes a large natural area that offers some of the best hiking opportunities in the unit. One of the few constructed BLM hiking trails is in the portion of the unit deleted. This trail offers the main hiking route to the top of the Canaan Mountain. The legal description of the lands deleted north of Eagle Crags more closely follows the uranium claims of Exxon. Exploration activities were planned during the inventory. Exxon's plans appear to have been cancelled after BLM dropped this portion of the unit from the wilderness review. In the east BLM deleted approximately 11,000 acres of natural rugged mesa tops and canyons. Almost all of the intrusions BLM identifies are along the unit boundary and occupy a small area. Some of the intrusions, fences, and gully plugs (called reservoirs by the BLM) are allowed in designated wilderness areas. The vehicle way is through sagebrush rolling hills and has no evidence of regular use or construction. In several cases the boundary is miles from the nearest impact and crosses large natural areas. [Utah Wilderness Coalition]

**20.27 RESPONSE:** See the response to General Comment 3.1.

**20.28 COMMENT:** BLM in many cases deletes much more acreage than is involved. In the case of the

**SPECIFIC COMMENT RESPONSE**  
**SECTION 20: CANAAN MOUNTAIN WSA (CONTINUED)**

Trees reservoir, the project is abandoned and the issue moot. BLM is required to rehabilitate this area, not drop it from wilderness. We request that BLM provide a list, map, and status of all interim management actions within the WSA. Clearly, BLM is recommending nonwilderness on areas because of actions that have occurred since 1976. This violates their own policy. [Utah Wilderness Coalition]

**20.28 RESPONSE:** See the response to Specific Comment 20.9. The South Creek area is now included within the partial wilderness area.

**20.29 COMMENT:** The locatable minerals discussion in the Draft EIS was incomplete according to industry sources. [Bureau of Mines]

a. In three places (pp.15, 27, and 30, Vol. III-A), the Draft EIS states there are no mining claims in the WSA. As part of our investigation of the mineral resources of the WSA (report in progress), we examined BLM claim recordation data in November 1985. According to these data and the claims holder, who also was contacted, claims of the Micron Gold, East Micron, Purple Clay, and 3-J's groups lie wholly or partially within the WSA.

b. Estimates (Draft EIS pp. 15-16, Vol. III-A) regarding size of uranium deposits possibly occurring in the WSA (as determined by the Department of Energy) are highly optimistic. Our investigation indicates the Chinle and Moenave, listed in the Draft EIS as the most likely host formations, are not favorable for uranium deposition in the WSA; they lack carbonaceous material and well-developed channeling.

**20.29 RESPONSE:** The post-FLPMA mining claim situation changes from time to time as location of claims will continue prior to wilderness designation. The Final EIS reports that there are 112 mining claims in the Canaan Mountain WSA.

Uranium ratings have been revised and are lower than indicated in the Draft EIS.

**SECTION 21**  
**MOQUITH MOUNTAIN WSA**

**21.1 COMMENT:** About 820 acres in the northeastern part of the WSA were deleted because of the "cumulative impact created by the Fredonia town

water system in the upper end of Indian Canyon." BLM deleted more than just the water system from the study area. This water system occupies less than 20 acres. We request that BLM limit the deletion to that which had significant human impact. The remainder of the WSA should be studied for wilderness. [Utah Wilderness Coalition]

**21.1 RESPONSE:** The acreage referred to in the comment was dropped from further study during the wilderness inventory. For answers to questions on BLM's Inventory Phase of the Wilderness Review Process, see the response to General Comment 3.1.

**21.2 COMMENT:** On the basis of improved manageability of the wilderness values and protection of at least a portion of the special features within the WSA, we recommend a Partial Wilderness Alternative of 8,800 acres as a third and the preferred alternative. Because of the intrusions of ORVs in the northern portion of the WSA and the lack of effective topographic barriers in much of the area, we recommend a new boundary that would include approximately 8,800 acres in the eastern and southern portions of the WSA. This approach offers two main benefits: (1) enhances manageability of the wilderness qualities within a majority of the WSA; and (2) meshes with the FWS's plans for protection of Asclepias welshii by allowing more dispersed ORV impacts to the species and, thus, lowering the threat to its survival. [Marvin Poulson]

This Partial Wilderness Alternative would preserve naturalness in the more rugged eastern and southern parts of the WSA, including Water and Indian Canyons (we assume that BLM would pursue acquisition of the State section in Indian Canyon for establishment of a rational natural boundary). Similarly, we would recommend that the western boundary be established that benefits from natural features for improved manageability, including portions of approximately three State sections on the top of the escarpment overlooking the State park. A boundary adjustment of this sort would substantially eliminate the ORV roads or ways from the WSA and would allow establishment of a northern boundary running south from the head of Indian Canyon to the head of South Fork of Indian Canyon (eliminating the need for cherry-stemming the road to the pictographs), then swinging slightly westward along the slope paralleling Water Canyon to about the middle of Section 35 (State section), and then following the rim south to the State line, abutting adjacent wild lands in Arizona. In

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 21: MOQUITH MOUNTAIN WSA (CONTINUED)

addition, this Partial Wilderness Alternative recognizes the relict sites in Water Canyon and the South Fork of Indian Canyon and would provide for protection of these extremely rare special features.

We believe that this Partial Wilderness Alternative affords a strong balance between recognition for and protection of the significant wilderness characteristics of the Moquith Mountain area and manageability of the integrity of the area and adjacent resources. While it is acknowledged that ORV use may still continue in the sand dunes portion of the area, any occasional sights and sounds from outside the WSA would not significantly impair outstanding opportunities for solitude in the wilderness.

We believe that the merits of the area and the manageability issue support the 8,800-acre recommended alternative as the preferred alternative.

**21.2 RESPONSE:** This alternative was suggested and considered during the scoping process for the EIS; however, it was not analyzed in detail because the alternative proposed is based mainly on the inclusion of State lands. The wilderness review process addresses public lands rather than State or private. See the responses to General Comments 6.3 and 6.4.

**21.3 COMMENT:** BLM clearly wants to promote ORV use in this area instead of resource protection. Clearly, the incredible natural values cannot be protected if BLM manages this area as an ORV playground. [Utah Wilderness Coalition]

ORV use is claimed by BLM to be a management problem that makes wilderness management not possible. BLM's past management has been to encourage, rather than control, ORV use. BLM ignores known management experience. BLM claims manageability problems exist "with ORV use and outside sights and sounds." BLM uses the sounds and sights of activities within the adjacent State park as one of the reasons to drop this area from wilderness designation. Our field work performed revealed no evidence of these problems within the WSA. BLM offers no objective data supporting their opinion. Under the Wilderness Study Policy, this activity should not be considered as a management problem.

**21.3 RESPONSE:** BLM has not promoted ORV use within the WSA. ORV use has been discouraged in this area by use of the following procedures: (1) the area has been signed, except in the sand dunes, to stay on

existing roads and trails. This requirement is generally being followed; (2) portions of the area are closed to ORV travel or limited to existing roads and trails under the land use plan; (3) BLM and State park personnel devote considerable time to educating the public on the values of the area and how to properly use it; and (4) the cultural resources and sensitive plant species within the WSA have been studied intensively, and Water Canyon/South Fork of Indian Canyon was formally designated as an ACEC in September 1986.

BLM's field experience is that ORV use within the adjacent State park is evident within the WSA on weekends during the spring and summer seasons resulting in a manageability problem for the WSA. Also, see the response to General Comment 8.19 which addresses manageability.

**21.4 COMMENT:** Moquith Mountain WSA is considered to have low-quality wilderness values and moderately high conflicts when compared with other WSAs in the region. The conflicts are primarily associated with water and nonwilderness recreational developments planned for areas within and adjacent to the WSA. [State of Utah]

Fredonia, Arizona, uses water from the WSA for culinary purposes. Gas company records indicate possible hydrocarbon reservoirs. Small oil fields, the Virgin field and Anderson Junction field, are nearby. Two areas within the WSA possess high wilderness quality or special features which may be deserving of special management designations. They include: (1) ONA designation for 1,000 to 1,640 acres. This would acknowledge the outstanding scenic value of the Ponderosa pine/sand dune ecosystems; and, (2) an ACEC designation for Water Canyon. The State has supported the Water Canyon ACEC in its comments on the proposed amendments to the Vermilion Cliffs MFP.

**21.4 RESPONSE:** Formal designation of the Water Canyon/South Fork of Indian Canyon ACEC was finalized in September 1986. The Vermilion Cliffs MFP was amended to include the ACEC designation. The conflicts and resource values referred to in the comment are discussed and analyzed in the EIS.

**21.5 COMMENT:** BLM uses woodcutting and ORV use as conflicts supporting nonwilderness for this area. BLM makes no analysis of other areas outside the WSA to provide ORV play areas and woodcutting. At this time, nearly 80 percent of public land is not

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 21: MOQUITH MOUNTAIN WSA (CONTINUED)**

being considered for wilderness designation and is open to these activities. The marginal short-term fire-wood gained in cutting this outstanding ecosystem clearly shows the imbalance of values used by BLM in making wilderness recommendations. [Utah Wilderness Coalition]

**21.5 RESPONSE:** Woodcutting within the Moquith Mountain WSA was only one of many resource uses noted in the EIS. Wood cutting is not a major factor in the rationale for BLM's Proposed Action. See Appendix 11 in Volume I which summarizes the BLM rationale for the Proposed Action.

**21.6 COMMENT:** There are no mineral conflicts. "Perhaps no other WSA in the Cedar City District exhibits as much topographic and vegetation variety in a limited area as does the Moquith Mountain unit" (Draft EIS, Page 14). Once again, screening was used to define solitude and, therefore, the claim is made that much of the WSA lacks qualification for wilderness designation. However, apparently the main reason that BLM is not recommending wilderness designation for this WSA is because "the Bureau's planning efforts have identified portions of the WSA as suitable for intensive recreation development" (SSA, Page 4). BLM's bias should not be used to determine whether the WSA is recommended for wilderness designation; the All Wilderness Alternative should become the Proposed Action. [Owen Severance]

**21.6 RESPONSE:** See the responses to Specific Comment 21.5 and General Comments 3.1, 9.8, and 22.3.

**21.7 COMMENT:** Page 1, Paragraph 1: If the 40 acres of private in-holdings are found at T. 44 S., R. 3 W., sec. 3: Lot 4, they are not shown on Map 1. The State owns the minerals on this parcel. [State of Utah]

Page 4, All Wilderness Alternative, Paragraph 1: The 680.42 acres of State land probably includes 40.42 acres of minerals only.

**21.7 RESPONSE:** The map has been revised to show the 40.42 acres of private land within the WSA (T. 44 S., R. 3 W., sec. 3, Lot 4). The State of Utah has reserved the mineral rights on this parcel of land. This information is included in the Final EIS. The 40.42 acres of split estate was included in the State land total in the Draft EIS.

**21.8 COMMENT:** It is interesting to note that the Draft EIS, while coming to the same conclusions as presented in the SSAs (in most cases), leaves out a lot of the damning information that was included in the SSAs. As a result, the Draft EIS is misleading because it doesn't state many of the reasons that could be used against adopting BLM's Proposed Action. For example, in the Red Mountain WSA, the Draft EIS does not include the information from the SSA that BLM's Proposed Action leaves out the "spectacular Red Cliffs paralleling old Highway 91" (SSA, Page 8). Another instance is the Moquith Mountain WSA, where the Proposed Action is No Action Alternative. The Draft EIS doesn't say that "the Bureau's planning efforts have identified portions of the WSA as suitable for intensive recreation development" (SSA, Page 4). These are typical omissions that prejudice the Draft EIS in favor of BLM's Proposed Action. The Final EIS should be more objective, but I am not optimistic that it will be. [Owen Severance]

**21.8 RESPONSE:** The intensive recreation development referred to in the comment was discussed during the scoping process and was introduced in the Draft EIS in detail on pages 1, 2, 4, 12, 13, 19, and 22. This information is also included in the Final EIS.

Also, see the response to Specific Comment 13.4 for information on Red Mountain.

**21.9 COMMENT:** BLM says "Designation of the Moquith Mountain WSA as a wilderness area would not provide any multiple resource benefits whose existing continued viability could be ensured only by wilderness designation." No ACEC is proposed for any part of this area. Apparently, BLM plans to protect these values by opening most of the area to ORV use and woodcutting. [Utah Wilderness Coalition]

**21.9 RESPONSE:** The Water Canyon/South Fork of Indian Canyon ACEC within the WSA was formally designated in September 1986. BLM is aware of special features and is managing them in an appropriate manner as noted in the response to Specific Comment 21.3.

**21.10 COMMENT:** The agency fails to recognize the rare plant species that occur within the WSA as special features. Particularly Asclepias welshii represents a visible and unique asset for observation and study. Furthermore, steps should be described that will afford protection to this plant which is a candidate for Federal listing. [Marvin Poulson]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 21: MOQUITH MOUNTAIN WSA (CONTINUED)**

**21.10 RESPONSE:** Asclepias welshii has been listed by FWS as threatened (Federal Register Notice, Volume 52, No. 208, Wednesday, October 28, 1987) and occurs in the Moquith Mountain WSA. This species is discussed and analyzed in the Vegetation section of the Moquith Mountain WSA analysis (Volume III-A) and in the Statewide analysis (Volume I). Asclepias welshii is recognized as a visible and unique asset for observation and study in the WSA. By law, regulation, and policy, BLM will not permit any actions that could jeopardize the continued existence of this species. It is further noted that the WSA contains several other special features such as hanging gardens, relict areas, and cultural resources.

**21.11 COMMENT:** Page 1, Response to Comment 1: Since Astragalus ampullaris has been found approximately 1 mile southeast of the west boundary of the WSA, it is highly likely that the ecological conditions necessary to support this species exist within the WSA boundary. Just because it has not been found inside the boundary lines does not mean that it should not be discussed in the Draft EIS. [State of Utah]

**21.11 RESPONSE:** Astragalus ampullaris has been listed by FWS as a Category 2 candidate species (50 CFR, Part 17). According to Welsh et al. (1987), this species is found in Utah on clay soils of the Chinle and Tropic Shale Formations in Kane and Washington Counties. The type is found near Kanab, Utah. The Moquith Mountain WSA consists predominantly sandstone-derived soils; therefore, potential habitat for Astragalus ampullaris is limited. Nevertheless, a possibility exists that the species could be found in the WSA. The text of the Vegetation section has been revised to include a discussion of the species, as suggested in the comment.

**21.12 COMMENT:** We agree with the conclusion that oil and gas resources in WSAs will be essentially foregone under the so-called Proposed Action. Specifically, our company concludes that inclusion of the following WSAs would adversely affect potential hydrocarbon exploration and development: Canaan Mountain, Parunuweap Canyon, Moquith Mountain, Paria-Hackberry, Wahweap, Burning Hills, and Fifty Mile Mountain. [Champlin Petroleum Company]

Enclosed is a geologic overview and critique of the Greater Kaiparowits Basin in Southern Utah. This report was prepared by Daniel D. Tisoncik, Senior Staff Geologist, Champlin Petroleum Company. His

report cites 21-million-barrel Upper Valley field in Garfield County.

**21.12 RESPONSE:** BLM has reviewed and updated the mineral information used in the EIS. The review indicates that there is a low degree of certainty for small deposits of oil and gas and a high degree of certainty for no coal deposits in the WSA. BLM does not project economic development of any mineral resources in the Moquith Mountain WSA in the foreseeable future.

See the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5 for information on the analysis assumptions and updating of mineral information for the Final EIS.

**21.13 COMMENT:** The other special features found in this WSA include the South Fork Indian Canyon pictograph and active sand dunes bordering on scattered groves of Ponderosa pine. No comprehensive inventory within the WSA is known to have been performed for archaeological features or rare and endangered species. [Utah Wilderness Coalition]

**21.13 RESPONSE:** Although a comprehensive inventory has not been conducted on the entire WSA, an intensive study has been done on portions of the area. The BLM portion of the sand dunes has been thoroughly mapped for populations of Asclepias welshii. Also the Cottonwood drainage and portions of its tributaries have been inventoried for cultural resources. The cultural resource and vegetation discussions have been revised and updated for the Final EIS, and BLM believes the data to be sufficient for purposes of the wilderness review. Also, see the responses to General Comments 9.6, 9.8, 13.1, 13.8, and 20.2.

**21.14 COMMENT:** Numerous archaeological sites from the Anasazi Indians are within the WSA which also can best be protected through wilderness designation. [Sierra Club, Cache Group]

**21.14 RESPONSE:** The presence of cultural resources in the WSA is identified and analyzed in the Final EIS. Also, see the responses to General Comments 9.2 and 20.1.

**21.15 COMMENT:** BLM claims that 5,700 visitors in ORVs use the WSA each year. BLM admits that they have no current inventory of actual use in the WSA. The description of this estimate is on Page 13 of the Moquith WSA section of Volume III-A. BLM estimates



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 21: MOQUITH MOUNTAIN WSA (CONTINUED)**

(again no monitoring has occurred) that 6,000 visitor days are spent in Grove campground on the north side of Moquith. [Utah Wilderness Coalition]

The Draft EIS then extrapolates this unverified estimate further, "approximately 95 percent (5,700 visitor days) is associated with sightseeing or sand dunes use with ORVs." No justification for choosing 95 percent is given. This should be explained. This does not say that they occur within or outside the WSA.

Most of those trips are on routes outside the WSA. BLM gives no basis for its claim that 5,700 visitors motor in the WSA. BLM is requested to explain the source of this number. The Draft EIS fails to explain how BLM arrived at this estimate. If the estimate is based upon the description we cited, it is clearly unsupported and arbitrary.

The evidence given shows that this number reflects all visitors in the area, including those who use the boundary road and hike in the area. BLM misrepresents this number to reflect mechanized recreation within the area. Unless BLM can substantiate this number, it should not be used in the Draft EIS.

Table 1, showing the consequences of wilderness designation, lists this ORV number. Since that number is totally arbitrary and without validation, it should not be used on that table. We request that BLM drop invalid estimations from consideration.

**21.15 RESPONSE:** The visitor use estimates for Ponderosa Grove were derived from information obtained from the visitor use roster, BLM recreation personnel, and Coral Pink Sand Dunes State Park personnel who make regular visits to the campground. This is the best available information. See the response to General Comment 9.8.

**21.16 COMMENT:** The following special biological communities are found in this area: Douglas fir (Water Canyon), hanging gardens (South Fork of Indian Canyon), and sand dune plant community (Coral Pink Sand Dunes). None of these ecosystems is used in discussing the diversity of the NWPS in this or other areas. [Utah Wilderness Coalition]

**21.16 RESPONSE:** All of the resources referred to in the comment are identified and analyzed in the EIS. Diversity is discussed in Volume I in the cumulative analysis.

**21.17 COMMENT:** Moquith Mountain has important biological diversity which wilderness status will best protect; in addition, there is a variety of unique topography that provides impressive scenic vistas. [Sierra Club, Cache Group]

**21.17 RESPONSE:** See the response to Specific Comment 21.16.

**21.18 COMMENT:** According to an undocumented BLM wilderness rating system, 40 percent of the area has "high quality wilderness values and 30 percent medium quality." All the area meets the mandatory wilderness criteria, and this BLM rating system is inconsistent with the Wilderness Study Policy. BLM failed to consider the values of the adjacent State park in its analysis. The analysis was limited, excluding many wilderness values (special features for example) specifically mentioned in their study policy. The cumulative value of these many factors omitted from BLM's consideration identifies a larger area of special values above those meeting the mandatory wilderness criteria. [Utah Wilderness Coalition]

**21.18 RESPONSE:** The EIS describes those areas with outstanding opportunities for solitude and primitive and unconfined recreation. The rating system referred to in the comment was not used in the EIS. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action. Also, see the responses to General Comments 8.11 and 22.5.

**21.19 COMMENT:** Seventy-five percent of the area would be open to ORV use. No mention is made on loss of protection to special features nor the impacts due to increased vehicle use in the area. BLM needs to systematically analyze and quantify the resource damage that would occur under the worst-case nonwilderness scenario. These significant impacts should be listed in the consequences table. [Utah Wilderness Coalition]

**21.19 RESPONSE:** The discussion and analysis of ORV use have been further quantified in the Final EIS. In short, loss of naturalness would occur in areas remaining open to ORV use (under the BLM land use plan), and opportunities for solitude would also be reduced, mainly during the spring and summer seasons.

**21.20 COMMENT:** By designating this area as wilderness, the nearby Coral Pink Sand Dunes State Park will receive better protection, and ORV activity at

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 21: MOQUITH MOUNTAIN WSA (CONTINUED)

the State park should not affect the wilderness status of this WSA. [Sierra Club, Cache Group]

**21.20 RESPONSE:** The EIS notes that the Utah State Division of Parks and Recreation plan (1985) is generally directed to accommodation of ORV recreational use. A wilderness designation for Moquith Mountain would not complement the planned use of the Coral Pink Sand Dunes; however, use of the dunes would be noticeable within the wilderness area, especially during the spring and summer months.

## SECTION 22

### THE BLUES WSA

**22.1 COMMENT:** BLM dropped 1,260 acres in the intensive inventory to "legal subdivisions." This boundary change has not been verified to see if it follows the inventory policy. The intensive inventory used the "cumulative effects" of intrusions alleged to occur in the southeastern portion of the WSA. [Utah Wilderness Coalition]

**22.1 RESPONSE:** See the response to General Comment 3.1.

**22.2 COMMENT:** We recommend a Partial Wilderness Alternative. This was an issue raised during the scoping process. We proposed that BLM consider designation of the lands which are infeasible for coal development. BLM has not responded. The Draft EIS does not show that BLM considered this request. [Utah Wilderness Coalition]

**22.2 RESPONSE:** BLM has considered a Partial Wilderness Alternative, but has not analyzed it in detail because the entire WSA is underlain by coal. The EIS acknowledges that the coal is more accessible in the western and central portions of the WSA; however, a Partial Wilderness Alternative would not resolve the conflicts with coal development. General Comment Responses 3.1, 3.6, and 3.7 discuss the inventory process and citizen alternatives.

**22.3 COMMENT:** BLM makes no clear statement of how the values in this WSA were used to make the recommendation. We ask that BLM consider the low feasibility of coal development (and other minerals as well). Only developments which are feasible should be considered as significant consequences of wilderness designation. In a sense, this is said on Page 7 of this

section of the Draft EIS. But, in an earlier column, BLM lists tons of coal and other minerals as the developments that "could be achieved." This table only lists significant consequences. If the development is infeasible, then those numbers should not be used. [Utah Wilderness Coalition]

**22.3 RESPONSE:** Appendix 11 in Volume I provides a summary of the rationale for the BLM Proposed Action. Even though it is not likely that coal will be developed in the short-term future (at least to the year 2020), it is a known resource that BLM believes will be developed in the long term. Also, see the response to Specific Comment 22.6 for additional references.

**22.4 COMMENT:** The coal potential was given too much weight in comparison to the area's associated wilderness values. The Draft EIS points out that this WSA's coal reserves are very marginal. This coal is only found in the southwest corner of The Blues. From a review of the Draft EIS, this appears to be the primary argument used to drop The Blues from BLM's proposal. The marginal coal makes BLM's argument very weak. [Sierra Club, Cache Group]

No strategic or critical minerals are present in The Blues WSA or within the Utah Wilderness Coalition's larger proposal.

**22.4 RESPONSE:** See the response to Specific Comment 22.6.

**22.5 COMMENT:** The Blues WSA is another Kaiparowits area that has been found unsuitable because of mineral resources (coal) and a convoluted negative analysis of primitive and unconfined recreation opportunities. This, despite an acknowledged "poor quality" and "low" potential of recoverable mineral resources (including coal). BLM seems to raise minerals as a major objection to recommending a wilderness alternative of any sort. Only one coal development exists in or near the WSA. The Shakespear mine lies within the only existing coal lease in the WSA. The Draft EIS deceptively uses a coal production figure of 25,000 tons for the entire Kaiparowits coal field in a context that suggests that the production is attributable to the Shakespear mine. Even according to BLM, the mine has not been active for many years and recently proposed development (1980) has not occurred, nor is there any indication that it will. [Utah Wilderness Association]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 22: THE BLUES WSA (CONTINUED)

**22.5 RESPONSE:** See the responses to General Comment 15.43 and Specific Comment 22.6 that discuss the potential for coal development in the Kaiparowits field. The EIS describes coal as the primary energy resource of The Blues WSA. Page 10 of the Draft EIS specifically states that 25,000 tons of coal have been removed from the Kaiparowits coal field, and no mines are currently active. It also states that a number of mines were active and lists the Shakespear mine as only one of these. BLM believes that the EIS accurately describes the coal values and past production of The Blues WSA.

**22.6 COMMENT:** This area is not recommended largely because of the potential development of the Kaiparowits coal field. However, the one coal mine within the existing WSA has not begun operation, and it was scheduled to start in 1980. [Jean Soko]

The Draft EIS states that "because of problems related to remoteness, accessibility, water availability, high mining and transportation costs, and competition from nearby coal fields . . . the field will face complex and expensive development problems for years to come." I also believe that the possibility of developing mines outside of The Blues and Mud Spring Canyon WSAs should be thoroughly investigated. This is a case of BLM making the evaluation which should be left to Congress.

**22.6 RESPONSE:** General Comment Responses 9.10 and 24.10 discuss the national perspective of minerals and analysis of alternative commodity supplies. General Comment Responses 2.23 and 8.6 address the wilderness study process and BLM's role in evaluating wilderness potential. Also, see the response to General Comment 15.43 which discusses the potential for coal development in the Kaiparowits field.

**22.7 COMMENT:** The relatively low-quality wilderness values found in the WSA are not significant enough to override the relatively high degree of conflicts present. The conflicts do not seem resolvable by any suggested boundary adjustment. However, the badlands portion of the WSA has an associated scenic turnout on State Highway 12 with a designated scenic overlook. An ACEC or scenic area designation for the badlands area would help to preserve these scenic values. Such a designation for this portion of the WSA might be a reasonable compromise. [State of Utah]

**22.7 RESPONSE:** The EIS analyzes the wilderness values and resource conflicts of The Blues WSA. Des-

ignation of an ACEC will be considered in future planning for the resource area, which is scheduled to be done between 1991 and 1994. The Statewide Wilderness EIS must be based on the current Paria Management Framework Plan (MFP). Also, see the response to General Comment 2.24, which discusses the need for expedited RMPs for the wilderness review process.

**22.8 COMMENT:** Page 17: 1,130 acres disturbed for mineral exploration and development seems high. [State of Utah]

**22.8 RESPONSE:** The mineral development and disturbance assumptions and projections have been revised for the Final EIS. See the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5. The Final EIS does not project any coal development and related disturbance for The Blues WSA in the short-term future. However, mineral and energy exploration and development is projected in the long-term future (beyond the year 2020).

**22.9 COMMENT:** Page 6, Geology: What part of the Cretaceous section is exposed on the surface? [State of Utah]

**22.9 RESPONSE:** The exposed sediments are generally Upper Cretaceous, approximately the equivalent of the Mancos Shale Formation in eastern Utah and western Colorado. This information has been added to the Final EIS.

**22.10 COMMENT:** If mining (of coal in the WSA) does occur, then erosion and watershed damage would be directly proportional to the rehabilitation that occurs on these sites. Rehabilitation of badland areas is unproven. [Utah Wilderness Coalition]

**22.10 RESPONSE:** Further information on reclamation potentials has been added to the Final EIS. See the response to General Comment 12.4.

**22.11 COMMENT:** Erosion of the fragile badlands through surface development is not meaningfully discussed in the Draft EIS. The chaining of the pinyon-juniper forests found in the higher elevations of the WSA would occur on soil unsuitable for this activity. Again, the Draft EIS failed to assess whether the soil erosion these developments would create would exceed soil protection requirements. No wildlife population changes are described by the Draft EIS for the development alternative. [Utah Wilderness Coalition]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 22: THE BLUES WSA (CONTINUED)

**22.11 RESPONSE:** The Final EIS notes that much of the WSA would not be considered suitable for rehabilitation (see Soils section). However, the vegetation treatments would be limited to those areas in the WSA that could be reclaimed. The Final EIS notes that the new forage would increase wildlife numbers (actual numbers are not known) and improve the condition of the present animal populations. The EIS also states that the proposed vegetation treatments would reduce soil loss following establishment of new vegetation. See the responses to General Comments 9.13 and 12.4 which address reclamation potential and the effects of chaining.

**22.12 COMMENT:** The exposed geology of The Blues has created habitat for at least one rare and possibly threatened species that the FWS has listed in the Federal Register for further study. The Kaiparowits daisy (Xylorhiza confertifolia) grows only on the exposed slopes of the Kaiparowits formation. Other rare plant species likely to occur within or near the WSA include : Penstemon atwoodii and Coryphantha missouriensis var. marstonii. [Utah Wilderness Coalition]

**22.12 RESPONSE:** The discussion and analysis of endangered and threatened plant species has been revised and updated for the Final EIS. Based on BLM inventories and consultation with other experts (see the Vegetation section for details), of the species mentioned in the comment, only Coryphantha missouriensis var. marstonii and Xylorhiza confertifolia are thought to occur in the WSA. It should be noted that protection of endangered, threatened, or other special status plant species would occur with or without wilderness designation.

Also, see the responses to General Comments 13.1, 13.2, 13.4, 13.5, and 13.10, which address the treatment of endangered, threatened, and special status plant species in the EIS.

**22.13 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Wilderness Study Areas 22, 23, 28, and 32 are situated in the Kaiparowits Basin of south central Utah. The hydrocarbon potential of this basin is relatively unexplored, since only a few test wells have been drilled in the area. One large oil field, Upper Valley, has been discovered in the basin, and it is reasonable to believe that other hydrocarbon accumulations exist in sedimentary rocks of Paleo-

zoic geologic age. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personal and discuss our concerns and interests in the resource potential of these areas. [Texaco]

**22.13 RESPONSE:** The Draft EIS noted that there was low certainty of small deposits of oil and gas in the WSA. The mineral information has been revised and updated for the Final EIS. Based on a structural trap in the Redwall Limestone or Cedar Mesa Formation similar to the Upper Valley field (located about 6 miles to the east of the WSA), the oil and gas rating has been revised to low certainty of moderate deposits of oil and gas (f3/c2). BLM projects that, without wilderness designation, there would at least be exploratory drilling for oil and gas in The Blues WSA in the foreseeable future (see Appendix 6).

Also, see the responses to General Comments 9.4, 9.10, 9.12, 15.1, and 15.5, which discuss the analysis assumptions and updating of mineral information for the Final EIS.

**22.14 COMMENT:** Page 11, Paragraph 3: While a moisture content of 18.3 percent and an average ash content of 13.6 are higher than that normally found in Western coals, the average Btu value of 11,683 is quite good and makes the statement of generally "poor to moderate quality" subject to question. [State of Utah]

**22.14 RESPONSE:** The rating of "poor to moderate" is for the Kaiparowits coal field in general. The EIS notes that coal within The Blues WSA would be considered of moderate quality, in general, and of average quality when compared to Kaiparowits coal. BLM believes that these statements accurately portray the quality of coal in the WSA.

**22.15 COMMENT:** The Blues is likely to be one of the least-favored areas for coal development in this region. [Utah Wilderness Coalition]

**22.15 RESPONSE:** Of the seven WSAs with Kaiparowits coal, The Blues has the smallest tonnage of recoverable coal. Its potential for development is ranked equally with the other tracts and exploration and development is projected in the long-term future (beyond the year 2020).

**22.16 COMMENT:** About 75-200 million tons of unleased coal are contained in the WSA. "Coal seams

# SPECIFIC COMMENTS AND RESPONSES

## SECTION 22: THE BLUES WSA (CONTINUED)

expose themselves on the surface paralleling and for the most part on the WSA southwestern boundary from the State highway to the Tropic Valley" (Doelling and Graham, 1972). These coal seams drop going east more than 5,000 feet in a distance of 10 miles beneath the surface. Historically, coal mining has occurred along the exposed portion of the coal seam just outside the WSA. [Utah Wilderness Coalition]

Future mining access would also be from areas just along the southwestern WSA boundary. BLM incorrectly located the coal deposit at the western edge. A majority of the coal seams expose themselves just outside the present WSA boundary. Mining access would also be limited to the western area along the western boundary of the WSA.

BLM also erred in the extent of the coal which lies under 2,000 feet of overburden. The eastern boundary should be more than 1.5 miles further west, based on the Doelling and Graham (1972) geological information. In view of the location of access to the coal field, a majority of the WSA's surface area would not be involved in coal mining.

The value of this coal, coupled with development problems (limited size of the commercially producible coal), explains why there are no coal leases in this area. The sulphur content averages more than twice that used in the Emery powerplants. This coal could not be used at that facility without violating air quality standards. The moisture content is higher than other coal more easily available, and the Btu ratings are lower. Under present demand forecasts, there appear to be several centuries of higher quality coal at a lower development cost outside the WSA. BLM has incorrectly determined that every ton of coal, no matter how marginal, outweighs any wilderness value, no matter how high.

**22.16 RESPONSE:** The Draft EIS accurately portrays the location of coal in the WSA when stating that: "The coal resources in the central and western portions of the WSA may have an economic advantage over more deeply buried deposits in the eastern portions of the WSA." BLM data indicate that there are approximately 245 million tons of in-place minable coal in The Blues WSA.

The EIS acknowledges the problems involved with coal production from the Kaiparowits field and projects that coal development will not occur in the short-term future. See the responses to General Com-

ments 15.43, 15.47, and 15.48 which discuss the feasibility of coal production from the Kaiparowits coal field.

Also, see the response to General Comment 9.10 which discusses the need for commodities and alternative sources.

**22.17 COMMENT:** The Alton coal field illustrates many of the problems inherent in developing southern Utah coal. Part of this field was designated unsuitable for strip mining by the U.S. Office of Surface Mining, owing to severe environmental constraints, including adverse impacts on visual resources, hydrologic impacts, and difficult revegetation. The latter problem is significant; Federal law prohibits surface coal mining in areas where native vegetation communities cannot be reestablished and maintained. Throughout southern Utah, but particularly in the severe climates and thin soils of wild land areas, revegetation may well be a fantasy. [Utah Wilderness Coalition]

**22.17 RESPONSE:** See the response to General Comment 12.4 for information on reclamation potential. The portion of The Blues WSA within T. 36 S., R. 2 W., has been designated by the Secretary of the Interior as unsuitable for mining by surface methods. However, coal reserves in The Blues WSA would be mined by underground methods, and the constraints referred to in the comment do not apply.

**22.18 COMMENT:** This WSA has important bear and mountain lion habitat that wilderness status can best protect. [Sierra Club, Cache Group]

**22.18 RESPONSE:** See the response to General Comment 16.4.

**22.19 COMMENT:** Vegetation management (chaining) alleged to improve grazing lands is cited by BLM to pose a conflict. The erosion impact from this would be prevented by a wilderness designation. This chaining is estimated by BLM to return an annual revenue of \$608.22, using the current AUM price. The cost of chaining far outweighs any return to the public. Wilderness would preclude this chaining on soil types BLM describes as unsuitable for this activity. Preventing chaining would save the public money. [Utah Wilderness Coalition]

**22.19 RESPONSE:** See the responses to General Comments 9.13 and 12.4 for information on the benefits of chaining and reclamation potential. The Final

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 22: THE BLUES WSA (CONTINUED)**

EIS has been reversed to show a potential for only 600 acres of vegetation treatments. The treatments would be restricted to those areas where proper reclamation and successful seeding could occur.

**22.20 COMMENT:** I feel that BLM has underrated this WSA in many respects. The first was in its visual resource classification. Why would the potential for an overlook on a highway be considered if this were truly Class B scenery? I have stopped many times, both day and night, to gaze over the rugged badlands of The Blues. I suggest that it is first-rate Class A scenery which impels me to do so. [Michael Van Note]

**22.20 RESPONSE:** Scenic quality ratings were determined in the Paria MFP. The MFP visual resource evaluation was contracted to Roy Mann Associates, Inc., who followed the procedures set forth in BLM Manual. The highway overlook is designed to provide a view of Powell Point in the Table Cliffs. This landmark is also featured at several Bryce Canyon National Park overlooks. Also, see the response to General Comment 19.1 which discusses BLM's visual resource inventories and methodology.

**22.21 COMMENT:** We disagree with BLM's findings that only part of the WSA has solitude and primitive recreation opportunities. The Blues contain exceptional opportunities for solitude and primitive outdoor recreation within a very natural surrounding extending throughout the Utah Wilderness Coalition's wilderness proposal. The Draft EIS states: "opportunities for hiking and hunting exist throughout the WSA" (Page 14). The Draft EIS also notes that the imprints of man are unnoticeable. [Sierra Club, Cache Group]

**22.21 RESPONSE:** See the responses to General Comments 2.12 and 3.1 for information regarding the evaluation of wilderness characteristics and BLM's wilderness inventory in Utah. Also, see the responses to General Comments 3.6 and 3.7 which discuss citizen alternatives such as the Utah Wilderness Coalition's proposal.

**22.22 COMMENT:** The Draft EIS states "the WSA affords outstanding opportunities for solitude due to vegetative and topographic screening situations" (Volume III-A, Page 13). Yet, only 8 percent of the WSA is determined to qualify for wilderness. The standards BLM uses are not even the ones which they should use. Volume II, Page 217, states solitude is not determined by vegetative and topographic screening,

but by the lack of habitation. BLM states that, when two or more types of recreation are possible in part of the area, it qualifies the area under the wilderness criteria. This WSA qualifies for outstanding opportunities for hiking, climbing, sightseeing, and photography. The Blues represent an outstanding, unique area outside of typical redrock lands. Diversity exists in geology, landforms, and vegetation, creating diverse recreational opportunities of wilderness caliber. [Kim Jennyson]

**22.22 RESPONSE:** The EIS analyzes the characteristics referred to in the comment, and concludes that 8 percent of the WSA has outstanding opportunities for solitude and 16 percent has outstanding opportunities for primitive and unconfined recreation. The criteria for these determinations are outlined in the text.

Also, see the responses to General Comments 2.12 and 3.1 which discuss evaluations of wilderness values and the inventory phase of BLM's wilderness review in Utah. See the responses to General Comments 2.13, 8.11, and 22.5 for information on mapping and ranking of wilderness values.

**22.23 COMMENT:** In addition to using screening to claim that most of the WSA doesn't meet the requirement for outstanding solitude, speculative mineral values were used to eliminate this WSA from the wilderness proposal, even though there is only one coal lease and no active mines. In a new twist, the EIS claims that outstanding opportunities for primitive and unconfined recreation exist only in those parts of the WSA where six "activity opportunities . . . exist together." BLM has once again redefined the rules to eliminate another deserving area from its wilderness recommendation. [Owen Severance]

**22.23 RESPONSE:** See the response to Specific Comment 22.22.

**22.24 COMMENT:** Wilderness values are recognized as being present throughout most of the WSA. The agency acknowledges that naturalness is present in all but 1 percent of the area where a portion of a way and 4 miles of fence are the only imprints; BLM calls them "substantially" unnoticeable. However, although BLM states that: "The WSA affords outstanding opportunities for solitude due to vegetation and topographic screening . . .," the agency goes on to directly contradict this analysis three paragraphs later by saying: "However, in much of the WSA

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 22: THE BLUES WSA (CONTINUED)

(unspecified), seclusion would be difficult to find." BLM goes on to use expressions of "feelings" to discount opportunities for solitude as well as primitive and unconfined recreation (e.g., "In summary, it is felt that 1,600 acres (8 percent) of the WSA have outstanding opportunities for solitude" and similarly "It is felt that . . . recreation . . . on 3,000 acres, 16 percent . . ."). Verbal descriptions by the agency contradict both the analysis for solitude and recreation. [Utah Wilderness Association]

**22.24 RESPONSE:** See the response to Specific Comment 22.22. The text of the EIS has been changed to indicate that the analysis is based on BLM's judgment after application of criteria to the WSA. The reference to feelings has been deleted.

The commentor has apparently overlooked the references to specific locations in the text of the EIS. If the statements are taken in context, the apparent conflicts are resolved.

**22.25 COMMENT:** During the wilderness inventory, BLM identified 19,030 acres as meeting the Wilderness Act characteristics. Now, they say 83 percent is of "low quality." No method based on the Wilderness Study Policy is given on how this number is reached. BLM only considered four types of recreation in this estimation. BLM also argues that, to meet the standard, each portion of the area must have several of the mandatory requirements (both outstanding solitude and outstanding wilderness activity opportunities). All of these are inconsistent with the Wilderness Study Policy. [Utah Wilderness Coalition]

**22.25 RESPONSE:** See the responses to General Comments 8.11 and 22.5.

**22.26 COMMENT:** I would also suggest that outstanding opportunities exist for solitude. Even in the "busy" hunting season, one would be hard pressed to have their solitude disturbed in over 75 percent of the WSA. This is due both to the ruggedness of the terrain and because it is adjacent to a FS roadless area. The presence of both these roadless areas was not given consideration by the FS during the RARE II process because BLM had no wilderness directive at that time. I feel that both these areas (The Blues and Table Cliffs/Henderson Canyon areas) form a large complementary wilderness of outstanding diversity in landform, elevation, vegetation, fauna, recreation, and visual impact, with more than ample opportunity

for solitude throughout most of nearly 40,000 acres. [Michael Van Note]

**22.26 RESPONSE:** Title II of Public Law 98-428 (Utah Wilderness Act of 1984) directs that the adjacent FS lands be released to ensure that they are available for nonwilderness uses. The quality of the wilderness values of The Blues WSA cannot be evaluated in conjunction with the adjacent released lands; however, the relationship of The Blues WSA to the FS land has been analyzed.

**22.27 COMMENT:** The Blues have some extraordinary rock-climbing areas which BLM failed to consider for primitive outdoor recreational opportunities. [Sierra Club, Cache Group]

We have special concerns about wilderness designation in Upper Pardner Canyon, Pasture Canyon, Jimmie Canyon, and Henderson Canyon.

**22.27 RESPONSE:** The EIS states that outstanding opportunities for recreation exist on about 16 percent of the WSA. This evaluation includes rock climbing, although this activity is very localized and dependent on cliffs.

**22.28 COMMENT:** The criteria used in judging recreation quality in The Blues is erroneous. The primary recreation judgment is based on "diversity of recreation" potential in various parts of the WSA. BLM says that, when two or more types of recreation are possible in part of the area, it qualifies that part of the WSA under their recreation criteria. However, when BLM perceives that only one form of recreation is possible (apparently no matter how high in quality it might be) the area does not meet the recreation requirements. BLM says that hiking and climbing are the highest quality forms of recreation found in The Blues. This is despite the strikingly unique steep terrain and landforms that abound for interesting sightseeing and photography. Nor does BLM acknowledge the distinct opportunities for botanical sightseeing and scientific study that abound within the WSA. [Utah Wilderness Association]

**22.28 RESPONSE:** All of the opportunities referred to in the comment are discussed and analyzed in the EIS. The locations of these opportunities are presented, and an overall evaluation is made. The EIS states that the number of possible activities is enhanced by variation in vegetation and topography. The area with

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 22: THE BLUES WSA (CONTINUED)

variation occurs along the Table Cliffs amphitheater and The Blues rim.

**22.29 COMMENT:** The intensive inventory decisions cite the following supplemental values: "The area contains botanical, geological, and paleontological supplemental values." It continues: "One threatened plant species, Xylorhiza confertifolia, is found in the Kaiparowits Formation." The single most permanent impression of this area is of the blue badlands capped by the Ponderosa and pinyon-juniper forests. These badlands form special geological features. [Utah Wilderness Coalition]

No threatened or endangered species inventory appears to have been performed. No inventory of archaeological values appears to have been done.

**22.29 RESPONSE:** The values addressed in the comment are analyzed in the EIS. BLM has not rated all of these values as special features, but the Kaiparowits Formation badlands is responsible for the geological and botanical sightseeing activities that contribute to the diversity of primitive recreational activities. Based on consultation with FWS and other studies, it has been determined that no threatened or endangered plant species are located in the WSA. However, six sensitive species including Xylorhiza confertifolia are thought to exist in the WSA (see Vegetation section for details).

Also, see the responses to General Comments 9.6, 13.1, 13.5, 13.8, 20.2, 22.4, and 22.12 which discuss the need for additional resource inventories.

**22.30 COMMENT:** The Blues abuts the national forest on its northern boundary. This boundary joins this area with a FS roadless area of 19,620 acres. We support the designation of this RARE II area, Henderson Canyon, as wilderness. Both of these areas should be considered together in one wilderness study. No mention of the management of abutting forest lands is described in the Draft EIS. [Utah Wilderness Coalition]

**22.30 RESPONSE:** Page 14 of the Draft EIS stated "Under its RARE II study the Forest Service found the Table Cliff-Henderson Canyon unit, which adjoins the WSA on the north, to be unsuitable for wilderness designation. The 1984 Utah Wilderness Act (P.L. 98-248) released the unit from further review by the Forest Service until the next revision of land management plans." This information has also been included

in the Final EIS. Also, see the responses to Specific Comment 22.26 and General Comments 3.23 and 8.7.

**22.31 COMMENT:** The Forest Service has a right-of-way through a portion of the unit. "If the Forest Service upgraded this substantially unnoticeable way, it could drastically impair wilderness character of the unit and manageability could be severely compromised due to sights and sounds" (SSA, Page 18). No Forest Service proposal is known to exist. [Utah Wilderness Coalition]

**22.31 RESPONSE:** The quote referred to in the comment was not carried forward into the Draft or Final EIS. BLM is not aware of any rights-of-way through the WSA owned by the Forest Service.

**22.32 COMMENT:** WSAs 22 (The Blues) and 23 (Mud Spring Canyon): A 230-kV transmission line scheduled for upgrading to 345-kV traverses northwesterly along portions of the west boundary of these two WSAs. BLM's Proposed Action omits these two WSAs, and Utah Power & Light supports that omission. This valuable transmission corridor, and the right-of-way to maintain it, must be protected from wilderness designation. [Utah Power and Light]

**22.32 RESPONSE:** The right-of-way and transmission line referred to in the comment are outside The Blues and Mud Spring Canyon WSAs and would not be affected by designation or nondesignation of either area.

**22.33 COMMENT:** Along the southwestern border of the WSA, a boundary modification could resolve resource conflicts. Two electric transmission line grants, a telephone line grant, and a pipeline grant would be affected. Lands outside the WSA would serve these utility rights-of-way should their need arise. [Utah Wilderness Coalition]

**22.33 RESPONSE:** See the response to Specific Comment 22.32. The facilities referred to in the comment are outside WSA boundaries, and sufficient space exists outside the boundaries of the two WSAs for future expansion. Therefore, these facilities and grants are not analyzed in the EIS.

**22.34 COMMENT:** Another aspect of development relates to a rail or coal slurry pipeline that has been suggested to transport coal from areas to the east of the WSA. Studies of potential routes for this transportation corridor suggest deliberately avoiding The



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 22: THE BLUES WSA (CONTINUED)

Blues. The reasons for this stem from the rugged, steep terrain and poor construction foundation of the shale formations in the WSA. This means that development of the area for virtually any purpose is very unlikely. [Utah Wilderness Association]

**22.34 RESPONSE:** The Land Use Plans sections of the EIS state that The Blues formation would be avoided by the proposed coal slurry line or railroad lines. However, the same constraints cannot be applied to all types of development.

The rail and slurry lines are not part of the rationale for BLM's Proposed Action. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action.

**22.35 COMMENT:** The 1980 Kaiparowits Coal Development and Transportation Study identified the whole WSA as a transportation corridor (not a coal development area). The study choose routes up to 15 miles in width for "maximum flexibility for future location," (SSA, Page 16). Both a rail line and a coal slurry line (water from Lake Powell) are in the corridor. At this time the lack of definition of the corridor prevents assessment of future impacts. [Utah Wilderness Coalition]

**22.35 RESPONSE:** The Kaiparowits Coal Development and Transportation Study selected corridors between 2 and 15 miles in width to retain maximum flexibility for the future location of specific routes. In corridor C-13, extremely narrow or multiple corridors were avoided by allowing The Blues to occupy the center of the corridor. The study considers The Blues and Canaan Peak as constraints to be avoided by any future transportation facilities within the C-13 corridor.

Also, see the responses to General Comments 8.18 and 23.2 for information on the Kaiparowits transportation corridors.

**22.36 COMMENT:** Page 10, Leasable Minerals: The discussion of oil and gas is well done. [State of Utah]

**22.36 RESPONSE:** Comment noted.

**22.37 COMMENT:** Oil and gas occurs in small isolated pockets in this region. BLM gives no DOE rating for this resource. Nearby exploration has not shown commercial quantities of oil or gas. [Utah Wilderness Coalition]

**22.37 RESPONSE:** See the response to Specific Comment 22.13.

## SECTION 23

### MUD SPRING CANYON WSA

**23.1 COMMENT:** In the intensive inventory BLM reduced this WSA from 65,000 acres to 38,075 acres. Approximately two-thirds of these deletions lie in the southeastern portion of the WSA. The deleted portions include outstanding habitat for wildlife and scenic badland areas. The southeastern deletions clearly deserve wilderness study. [Utah Wilderness Coalition]

**23.1 RESPONSE:** During the inventory, BLM found that the southeastern portion of the roadless unit did not have opportunities for solitude or primitive recreation. This was upheld by the Interior Board of Land Appeals' remand decision. See the response to General Comment 3.1.

**23.2 COMMENT:** This WSA was reduced to the present size without cause during the intensive inventory. BLM eliminated over 19,000 acres because both solitude and primitive recreation values, in addition to naturalness, were claimed to be absent. At that time, BLM stated that the rest of the area had all three characteristics. Now, BLM claims that most of the WSA lacks either solitude or primitive recreation values. Screening and the new requirement that only multiple primitive recreation values in the same area are acceptable for wilderness recommendation. Obviously, the primary reasons this area is recommended for no wilderness are speculative mineral values and a speculative railroad corridor. The present wilderness values of this WSA are far more important than those speculative values. The 51,000-acre proposal by the Utah Wilderness Association includes more of the area that meets the requirements for wilderness designation than does BLM's proposal, and it should be adopted by BLM. [Owen Severance]

**23.2 RESPONSE:** See the responses to Specific Comment 23.1 and General Comment 3.1, which discuss BLM's wilderness inventory in Utah. Appendix 11 in Volume I summarizes the rationale for the BLM Proposed Action. BLM believes the long-term potential for coal development outweighs the wilderness potential of this WSA.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 23: MUD SPRING CANYON WSA (CONTINUED)

Also, see the responses to General Comments 3.1, 3.6, and 3.7 for information regarding citizen alternatives, such as the Utah Wilderness Association's proposal.

**23.3 COMMENT:** The Partial Wilderness Alternative wasn't considered because BLM incorrectly concluded that ". . . there were no major resource conflicts that could be adequately mitigated with a boundary adjustment." In examination of the DOE energy-resource potential map, less than half of the area has energy development potential. The energy development potential in this area is also of marginal quality. If BLM considered the feasible conflicts, then it is possible to devise a boundary that would exclude impacts. We request any written evidence that BLM used in making this conclusion. There is no factual support for this conclusion. Unsupported, it seems arbitrary. [Utah Wilderness Coalition]

**23.3 RESPONSE:** The minerals data for the Mud Springs Canyon WSA has been restudied and revised for the Final EIS. It has been determined that coal underlies the entire WSA at depths of 1,000 to 3,000 feet, and that the amount of coal with overburden exceeding 3,000 feet is negligible. Coal in seams 5 feet or more in thickness, and with overburden of 3,000 feet or less, is considered minable. Therefore, a Partial Wilderness Alternative would not resolve conflicts with minable coal.

BLM recognizes that coal extraction from the WSA is not likely to occur in the short-term future (to the year 2020), although there is long-term potential (beyond the year 2020). Also, see the responses to General Comments 15.43, 15.47, and 15.48.

**23.4 COMMENT:** The area was evaluated to have excellent solitude, primitive and unconfined recreation, and abundant special features (Pages 14-15), yet the No Action Alternative recommendation was proposed. The area was excluded, apparently based on proposed transportation corridors and truck haul routes (Page 15) and potential coal development in the area (Page 19). Despite the claim that the "Probability of coal being developed here is high in the long term" (Page 19), it seems rather odd that there is not a single coal lease in the area. Half of the WSA is covered by the Wahweap and Kaiparowits Formations, which means the coal would be several thousand feet below the surface. This would be extremely expensive coal. [Robert Hassell]

**23.4 RESPONSE:** See the responses to General Comments 15.43 and 15.44. BLM's Wilderness Study Guidelines direct the agency to address "known and potential mineral values." The presence of coal in this WSA is known, and there is a long-term potential for development. BLM finds that, in this WSA, the long-term potential for coal development outweighs wilderness values.

Also, see the response to Specific Comment 23.3 for a discussion of coal depths and minability.

**23.5 COMMENT:** Mud Spring Canyon WSA is simply another example of high-value Kaiparowits Plateau wilderness being ignored and downplayed because of a potential conflict with coal development. Indeed, the very presence of coal seems to obstruct BLM's ability to recognize, in any objective fashion, wilderness values in the area. [Utah Wilderness Association]

Coal exists in the WSA but, like all Kaiparowits coal, it is uncertain at best if it will ever be mined. Most indications are that it won't be, which should figure heavily in BLM's suitability recommendation. This "conflict" should not get in the way of BLM's recognizing the important wilderness values of the area.

**23.5 RESPONSE:** See the responses to Specific Comments 23.3 and 23.4.

**23.6 COMMENT:** Most of the WSA has no mineral conflicts, so why did BLM recommend no wilderness at all? There are also a few potential oil and gas conflicts found here, but they cover a very small portion of the WSA. These potential conflicts are very small when compared against the outstanding wilderness values that are already present here. [Rudy Lukez]

**23.6 RESPONSE:** See the response to Specific Comment 23.3. Based on data acquired since preparation of the Draft EIS, the oil and gas rating has been reduced from a very low certainty of moderate-sized deposits (f3/c1) to a very low certainty of small deposits of oil and gas (f2/c1). The oil and gas potential of the WSA is not a primary rationale for BLM's Proposed Action (See Appendix 11 in Volume I).

**23.7 COMMENT:** The relatively low-quality wilderness values of Mud Spring Canyon WSA do not outweigh the high degree of conflict present in this WSA. There are, however, some outstanding special visual

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 23: MUD SPRING CANYON WSA (CONTINUED)**

features in this WSA, notably the scenic values in parts of the WSA and a waterfall at the entrance to a pristine relic canyon ecosystem. The high degree of conflict with other land uses (minerals, land treatments, and transportation corridors) will likely prevail over wilderness values. Special features could be given an alternative management designation, such as a RNA for the relic canyon system and scenic area designation for The Cockscomb area. [State of Utah]

**23.7 RESPONSE:** The wilderness values of the WSA have been analyzed, along with the potential conflicts referred to in the comment. If released by Congress, alternative designations (e.g. RNA/ACEC designation) will be considered in future BLM land use plans for the area.

**23.8 COMMENT:** No map showing the potential chainings was provided. Their location needs to be known. [Utah Wilderness Coalition]

**23.8 RESPONSE:** The Description of the Alternatives sections have been revised to specify the general locations of the proposed land treatments. In summary, the vegetation treatments would occur in scattered areas throughout the central, southern, and western portions of the WSA. Also, see the response to General Comment 26.1.

**23.9 COMMENT:** Wilderness designation would prevent 8,330 acres of chaining and burning of pinyon-juniper forest. In BLM's own analysis, watershed protection needs and erosion control standards make the area unsuitable for this activity. The benefits of this appear to be exceeded by the costs even when measured solely in economic terms. [Utah Wilderness Coalition]

**23.9 RESPONSE:** See the response to General Comment 9.13. The Final EIS has been revised to consider only 1,000 acres of vegetation treatments. These would occur only in those areas where successful seeding could follow.

**23.10 COMMENT:** The impacts of alternatives on riparian habitat, which Volume I describes as "unique and limited high-value wildlife habitat," are not described. [Scott Mills]

**23.10 RESPONSE:** BLM does not project any disturbances to riparian habitat in the foreseeable future resulting from implementation of any of the alternatives.

**23.11 COMMENT:** Also missing is an economic analysis of the lack of benefits from the chaining of pinyon-juniper forests. By approving chaining, BLM postpones benefit analysis until later. In dollars alone, analysis in similar areas has shown that this damaging practice costs far more than it returns. The analysis fails to address the benefits in erosion control by not chaining. [Utah Wilderness Coalition]

**23.11 RESPONSE:** See the responses to General Comments 12.1 and 24.5, which address the relationship of chaining to soil erosion and the costs and benefits of land treatments.

**23.12 COMMENT:** Page 3, All Wilderness Alternative: The narrative states it is assumed that mining claims would be located prior to wilderness designation, yet the Affected Environment section (Page 12) states that only uranium has been identified as having any potential for development, and the potential for uranium is low. Under which criterion is the assumption that mining claims will be located in the proposed wilderness based? [Agency comment]

**23.12 RESPONSE:** This assumption recognized that there is some uranium potential in the WSA and that, under the Interim Management Policy, mining claims may be located in WSAs until the date of wilderness designation. However, BLM has reevaluated minerals and economics and has updated the mineral development assumptions for the Final EIS. The Final EIS does not project any uranium development in the WSA in the foreseeable future.

**23.13 COMMENT:** A document not included with the Draft EIS mentions the potential for coal, oil, and gas. Recent exploration not considered in BLM's recent geologic analysis proved that there is little likelihood that the WSA has oil. [Utah Wilderness Coalition]

**23.13 RESPONSE:** See the responses to General Comments 15.1 and 15.2.

**23.14 COMMENT:** The nearest oil and gas field is found in Upper Valley. BLM indicates that Tenneco has defined the limits of this field to end outside the WSA approximately 0.25 mile northeast. Only a small portion of the WSA is shown to have a significant favorability. [Utah Wilderness Coalition]

**23.14 RESPONSE:** This information is contained in the Final EIS. See General Comment 15.10.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 23: MUD SPRING CANYON WSA (CONTINUED)

**23.15 COMMENT:** Of equal interest is the rating for oil and gas, which implies a moderately "high" potential, although the Draft EIS does state that most of the WSA has "low" potential. BLM should not be precluding further analysis of this potential conflict by giving the WSA an unsuitable recommendation. It seems unlikely this oil and gas resource could outweigh the WSA's wilderness values. [Utah Wilderness Association]

**23.15 RESPONSE:** See the responses to General Comments 2.33 and 15.10.

**23.16 COMMENT:** "Possible problems from energy development on pre-FLPMA oil and gas leases (46 percent of the WSA)." Oil and gas leases carry stipulations concerning surface disturbances. BLM provides no information on what stipulations are now in place. BLM gave no legal analysis clearly defining problems with pre-FLPMA leases and claims. Unsupported opinions cannot be used by BLM to make wilderness study recommendations. [Utah Wilderness Coalition]

**23.16 RESPONSE:** The Final EIS indicates that there are no pre-FLPMA leases in this WSA. Also, see Appendix 11, which summarizes the rationale for the BLM Proposed Action. Oil and gas potential is not a major rationale for BLM's Proposed Action.

**23.17 COMMENT:** Extensive coal mining impact analyses are absent from the analysis. Conflicts with present uses (hunting, grazing, etc.) are not addressed. The ability of BLM to manage coal, oil, and gas development under present limitations is not assessed. BLM claims that they cannot manage ORVs in areas they recommend dropping from wilderness designation (Moquith Mountain), yet they can manage enormous coal development in areas they again recommend dropping from wilderness designation. [Utah Wilderness Coalition]

Enormous local economic costs of coal development are not addressed, only the development benefits.

**23.17 RESPONSE:** All of the resources referred to in the comment are addressed in the EIS. BLM is able to control oil, gas, and coal development through stipulations placed on leases at the time of issuance. The EIS identifies the leasing categories that apply. In addition, coal developments must meet the unsuitability criteria before development can proceed. Therefore, BLM has assumed that all future users in the WSA

would meet the requirements for all applicable Federal, State, and local permits. ORV use is dispersed and is not as easily regulated as mineral developments that are stationary and controlled through the stipulations referred to above. Therefore, ORV use is less manageable than mineral development.

The Final EIS projects that coal development will not occur in this WSA within the short-term future, but is likely to occur in the long-term future.

**23.18 COMMENT:** Page 12, Coal, Paragraph 3: The statement concerning nondevelopment of the deeper coal in this WSA seems questionable. Coal is generally minable down to 3,000 feet, with some increase in cost as the depth increases, but not necessarily enough to make the 1,000-foot coal producible and the 3,000-foot coal nonproducibile in the same mine. [State of Utah]

**23.18 RESPONSE:** The text has been revised to indicate that essentially the entire WSA is underlain by minable coal. See the response to Specific Comment 23.3.

**23.19 COMMENT:** ". . . 30-50 million tons of coal would be foregone (with wilderness designation) with an unknown amount of oil and gas." No coal leases are present now. Adequate coal exists outside this area (more than 23.5 billion tons in Utah alone), and this coal is of marginal quality unsuitable for use in existing power plants in Utah. BLM has incorrectly made any ton of coal more valuable than any wilderness value. BLM needs to develop a method of assessing the feasibility of coal development in Utah. This would include the quality of the deposit, its quantity, extraction costs, environmental protection needs, and transportation and processing costs. [Utah Wilderness Coalition]

**23.19 RESPONSE:** See the responses to General Comments 3.3, 15.20, 15.22, and 24.9.

**23.20 COMMENT:** This area is infeasible for development in the foreseeable future. The coal resource is not a significant concern or consequence to conflict with wilderness designation. [Utah Wilderness Coalition]

In the immediate area of Mud Spring Canyon WSA, the moisture and ash content are particularly high, averaging 19.50 percent and 13.77 percent, respectively. "The sulfur content averages 0.98

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 23: MUD SPRING CANYON WSA (CONTINUED)**

percent, and the heat value averages 11,207 Btu per pound (Doelling and Graham, 1972)." Coal with this sulfur content burned in the Emery powerplants would likely create emissions exceeding the National Clean Air Act standards.

**23.20 RESPONSE:** See the responses to General Comments 9.7, 9.14, and 10.4 which discuss national emission standards.

**23.21 COMMENT:** AMCA is the record assignee of 40,277 acres of Federal coal leases and 6,210 acres of Utah State coal leases in the Kaiparowits coal fields, an important part of which lies within the Wahweap and Burning Hills WSAs, and all of which is adversely affected by potential transportation problems resulting from the adjoining Mud Spring Canyon and Death Ridge WSAs. BLM studies and final recommendations eliminate all of these WSAs from their Proposed Action shown on Pocket Map 4, "Paramount Wilderness Quality Alternative." [AMCA]

The coal measures underlying these WSAs contain the largest reserve of quality coal in the western United States which has remained undeveloped because of lack of transportation. In 1960, an active exploration program in preparation for a mine-mouth powerplant began. This work demonstrated over 400 million tons of coal, fully explored and ready for mining. The mine-mouth powerplant project died after a long controversy over the impact of a second plant in the Glen Canyon area. Locking up these reserves in a wilderness area would deprive the southwest states of a major energy base sufficient to serve the needs of power generation and gas liquid fuel conversion for generations to come.

We urge BLM to withdraw Wahweap, Burning Hills, Mud Springs Canyon, and Death Ridge WSAs from further consideration. They contain known reserves on which many millions of dollars have been spent in exploration, mine planning, permitting, and water acquisition.

**23.21 RESPONSE:** The EIS acknowledges that the Kaiparowits coal field is a significant resource and has considered the long-term potential for development as major rationale for BLM's Proposed Action.

BLM's Proposed No Action/No Wilderness Alternative was shown on Pocket Map 1, rather than Pocket Map 4 of the Draft EIS. This was identified as the Pro-

posed Action rather than the Paramount Wilderness Alternative.

**23.22 COMMENT:** The Resources Company drilled 202 holes on the leasehold. Information includes plats showing structural contours and isopachs of various seams, cover lines, and all data needed for mine layout and planning. The work was incorporated into an application to mine filed with the then USGS Minerals Conservation Branch, which is now the Minerals Management Division of BLM and the Utah Division of Oil, Gas, and Mining. The application, consisting of many volumes, is in the files of those agencies and available for inspection. If these WSAs are not eliminated from the EIS, mining from this field will be precluded, this tremendous resource will be lost, and last, but certainly not least, the \$25 million spent on exploration, planning, and development will have been wasted. This scenario would be tragic. [AMCA]

**23.22 RESPONSE:** See the response to Specific Comment 23.21. Only Congress can release WSAs from the wilderness review process. BLM's Proposed Action in the Final EIS for this WSA is the No Action/No Wilderness Alternative.

**23.23 COMMENT:** This WSA has important Ponderosa-covered mountains for wildlife. Only wilderness designation will properly protect this biological resource. [Sierra Club, Cache Group]

**23.23 RESPONSE:** See the response to General Comment 16.1. The EIS acknowledges the diversity of habitat types in the WSA. Wilderness designation is not the only means available to BLM for protection of wildlife. Other legal tools include the Endangered Species Act, Fish and Wildlife Coordination Act, and State laws regarding the management and harvest of wildlife. BLM does not project any surface disturbance in the Ponderosa pine vegetation type in the WSA in the foreseeable future.

**23.24 COMMENT:** It is asserted that the All Wilderness Alternative would have a negative impact on wildlife because water is limiting for wildlife and wildlife would be negatively impacted by the prevention of 1,000 acres of land treatments. This assertion does not consider wildlife in the broad sense. [Scott Mills]

**23.24 RESPONSE:** See the responses to General Comments 9.13 and 24.5, which address environmental and economic costs and benefits of chaining as

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 23: MUD SPRING CANYON WSA (CONTINUED)**

a land treatment. Also, see the responses to General Comments 16.4 and 16.14.

**23.25 COMMENT:** The impressive cliffs south of Henrieville Creek, off Utah Highway 12, should be protected as a part of the wilderness area to ensure scenic vistas for area travelers. People visit Utah's parks not only for the parks, but for the areas around as well. Wilderness designation of this area is the only way to protect these views as tourists expect and want to see them. [Sierra Club, Cache Group]

**23.25 RESPONSE:** The surface disturbance projected to occur in the WSA would be located in the pinyon-juniper woodland and sagebrush flat land areas in the central, south, and western portions of the WSA. The cliffs mentioned in the comments would not be affected.

**23.26 COMMENT:** We disagree with BLM's assessment that Mud Spring Canyon WSA does not contain enough opportunities for solitude and outdoor recreation. This WSA has significant opportunities for primitive outdoor recreation and outstanding solitude within a natural setting, as required by the 1964 Wilderness Act. [Sierra Club, Cache Group]

**23.26 RESPONSE:** See the responses to General Comments 2.12, 3.1, 8.11, and 22.5. The EIS reports that outstanding opportunities for solitude and primitive recreation exist in portions of the WSA. Also, see the response to General Comment 8.6 for information on suitability determinations.

**23.27 COMMENT:** BLM argues that only 35 percent of the unit has "high quality wilderness values." BLM uses a rating system, an analysis system in violation of the Wilderness Study Policy. The rating system methodology is not documented and is applied inconsistently. [Utah Wilderness Coalition]

**23.27 RESPONSE:** See the response to Specific Comment 23.26.

**23.28 COMMENT:** The impressive Cockscomb formations should be protected for their unique and scenic values.

**23.28 RESPONSE:** The EIS describes the 4,100 acres of The Cockscomb in the WSA as having exceptional scenic values. Under BLM's Proposed Action, The Cockscomb would be managed under VRM Class III, which indicates that modifications should remain

subordinate to the landscape character. No surface disturbance is projected to occur on the Cockscomb itself.

**23.29 COMMENT:** There is a very scenic and unique waterfall at the entrance to Dry Valley Creek Canyon which adds tremendous primitive value to the Mud Spring Canyon area. Only wilderness designation will properly protect this natural attraction. [Sierra Club, Cache Group]

**23.29 RESPONSE:** Dry Valley Creek is a perennial stream that would be protected by water pollution control, riparian protection, and other laws and guidelines with or without wilderness designation.

**23.30 COMMENT:** BLM incorrectly listed the Kaiparowits Coal Development and Transportation Study under land use plans and controls. This is not a land use plan or control, but a hypothetical study. This should be removed from this section. [Utah Wilderness Coalition]

BLM has identified the entire WSA as a coal development transportation corridor. "By selecting corridors between 2 miles and 15 miles in width, maximum flexibility for future location of specific routes was maintained." Union Pacific Railroad has identified a potential rail route along the southern border of the WSA. There are no proposals or plans for this. BLM should limit consideration to the needs identified. BLM should limit the area in conflict to realistic utility facilities and assess alternate routes. This cannot be called a significant conflict until BLM does the necessary analysis.

**23.30 RESPONSE:** See the responses to General Comments 8.18 and 23.2.

**23.31 COMMENT:** A proposed railroad line crossing some of the most spectacular geography in this area is listed as a conflict. The deletion of the southeastern part of the WSA in the inventory also is related to this proposed rail line. By using excessively wide transportation corridors (up to 15 miles wide), BLM has exaggerated the impact of wilderness designation to this development. [Utah Wilderness Coalition]

**23.31 RESPONSE:** See the responses to General Comments 8.18 and 23.2.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 23: MUD SPRING CANYON WSA (CONTINUED)

The Kaiparowits Coal Development and Transportation Study selected corridors between 2 and 15 miles in width to retain maximum flexibility for the future location of specific routes. In corridor C-13, extremely narrow or multiple corridors were avoided by allowing Canaan Peak north of the Mud Spring Canyon WSA to occupy the center of the corridors. The study considers Canaan Peak as a constraint to be avoided by any further transportation facilities within the C-13 corridor.

**23.32 COMMENT:** Transportation to the markets in the Southwest can be accomplished by truck to rail sites and thence to market. The truck haul is somewhat longer than the 85-mile haul to the railroad presently made in central Utah from Salina Canyon to Levan. Although this seems potentially a large cost, this truck haul serves to reduce the rail haul to the Southwest by 200 miles and equates to a cost saving, not an extra expense. Costs per ton per mile for rail vs. trucks over short hauls have been narrowing for years. It cannot be predicted when this trend will level off. However, under present costs, coal can be moved from Kaiparowits to Southwest markets at costs comparable with coal from central Utah. [AMCA]

**23.32 RESPONSE:** See the responses to General Comments 15.43, 15.47, and 15.48 which discuss the feasibility of development of the Kaiparowits coal field.

**23.33 COMMENT:** WSAs 22 (The Blues) and 23 (Mud Spring Canyon): A 230-kV transmission line scheduled for upgrading to 345-kV traverses northwesterly along portions of the west boundary of these two WSAs. BLM's Proposed Action omits these two WSAs, and Utah Power & Light supports that omission. This valuable transmission corridor and the right-of-way to maintain it must be protected from wilderness designation. [Utah Power and Light]

**23.33 RESPONSE:** See the response to Specific Comment 22.32.

**23.34 COMMENT:** A minimum of 75 well paid jobs would be required for a start-up mine; the benefits to the surrounding communities would be substantial. The share of Federal royalty going to State institutions would be significant and, as State leases were opened up, larger sums per ton of production would be available to education through the State Division of Lands and Forestry. We believe that State and local

officials should speak for themselves but, without question, the well being of the region would be permanently damaged by the continued inclusion of Wahweap, Burning Hills, Death Ridge, and Mud Spring Canyon in the wilderness study program. [AMCA]

**23.34 RESPONSE:** See the response to General Comment 24.20. BLM notes that local communities would likely receive some economic benefit were coal mining activities to occur.

**23.35 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Wilderness Study Areas 22, 23, 28, and 32 are situated in the Kaiparowits Basin of south central Utah. The hydrocarbon potential of this basin is relatively unexplored, since only a few test wells have been drilled in the area. One large oil field, Upper Valley, has been discovered in the basin, and it is reasonable to believe that other hydrocarbon accumulations exist in sedimentary rocks of Paleozoic geologic age. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**23.35 RESPONSE:** This WSA is presently rated as f3/c1. Because of low certainty, oil and gas exploration are not expected in the foreseeable future.

## SECTION 24

### PARIA-HACKBERRY WSA

**24.1 COMMENT:** BLM's Paria-Hackberry roadless area is one of 60 or more crystal-clear examples of BLM's pro-development wilderness inventory policy. Of an original roadless area of nearly 200,000 acres, BLM carved a WSA of 135,822 acres, reducing the size of the roadless area by more than 30 percent. As BLM's Director Gary Wicks specifically acknowledged in two memos to BLM's National Director Frank Gregg, some 22,000 acres of the lands dropped from inventory were entirely natural, and therefore qualified for inclusion in the WSA. Why, then, was an area nearly twice the size of BLM's proposed Behind the Rocks Wilderness Area arbitrarily omitted from Paria-Hackberry WSA? The answer can be found among the broken and twisted wreckage of the pinyon-juniper forest that once covered Calf Pasture Point.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 24: PARI-A-HACKBERRY WSA (CONTINUED)

This spectacular forest land at the rim of the White Cliffs was entirely natural in 1980 when Gary Wicks asked BLM director Frank Gregg for special permission to deviate from BLM's wilderness inventory policy in omitting it from Paria-Hackberry WSA. Today it looks like a bombing and gunnery range. When a conservationist's appeal of the exclusion failed in 1983, BLM immediately brought in bulldozers and chained 1,000 acres of forest on the point. Virtually all of the land omitted from the WSA is targeted for similar chainings. BLM omitted these benchlands not because they lacked wilderness values, but for the express purpose of facilitating such chainings and other kinds of development. [Raymond Wheeler]

**24.1 RESPONSE:** See the response to General Comment 3.1.

**24.2 COMMENT:** Three roadless areas have a special importance because of their location precisely in the center of one of Utah's most important natural areas: the Grand Staircase. Between the rim of Bryce Canyon and the floor of Grand Canyon, the land drops 9,000 feet in a series of gigantic cliffs and terraces. This "staircase" is a topographical, ecological, and geologic masterpiece encompassing six major life zones (from Lower Sonoran to Arctic-Alpine) and at least 1.5 billion years of earth history. The Paria-Hackberry, Squaw Creek, and Willis Creek roadless areas encompass the entire middle section of the "Grand Staircase" and together reach from the recently designated Paria Canyon Wilderness Area on the south to Bryce Canyon National Park on the north.

By designating all three BLM roadless areas we can create an unbroken corridor of designated wilderness reaching all the way from the headwaters of the Paria River to its mouth at Lee's Ferry--and thus to Grand Canyon National Park. Imagine the thrill of hiking from the rim of Bryce Canyon down into the heart of Grand Canyon--a journey of hundreds of miles--without ever encountering signs of civilization except for two dirt roads and one paved road crossing your path. Such a hike is possible today, and indeed a similar descent of the Grand Staircase is described in Paul Geerling's book Down the Grand Staircase. It describes an experience that will no longer be possible if the roadless lands of the Paria River drainage continue to be slashed into ribbons. In spite of their singular importance in protecting one last undeveloped remnant of the Grand Staircase, the Squaw and Willis Creek roadless areas were dropped altogether from wilderness study in 1979. BLM concluded, on the basis of aerial reconnaissance,

that these areas "clearly and obviously" lack wilderness character. [Raymond Wheeler]

**24.2 RESPONSE:** See the response to General Comment 3.1.

**24.3 COMMENT:** The proposed Partial Wilderness Alternative for this WSA left out too many good places. However, on further reflection I have decided that your alternative is probably a good one. You have drawn the boundaries to include Hackberry Canyon, Bull Valley Gorge, No Man's Mesa, and Upper and Lower Death Valley, which I think are the best areas for wilderness in the WSA. I understand the needs of area stockmen to continue to use and develop the water sources in the region plus their need for vehicular access along the routes and ways that penetrate this country. In the spirit of compromise, therefore, I can support the Partial Wilderness Alternative for this area. [Robert Hassell]

The boundary you have drawn guarantees protection of solitude in the canyons and encloses an area sufficiently large to protect portions of White Cliffs and the very important watershed of the region. I am glad to see protection proposed for the very important ecosystem around No Man's Mesa. Actually, I'm glad to see this region finally get the attention it deserves.

**24.3 RESPONSE:** The proposed Partial Wilderness Alternative in the Draft EIS did not include No Man's Mesa, but it has been added to the Proposed Action in the Final EIS. No Man's Mesa is a relict area that was designated a Research Natural Area by BLM in September, 1986.

**24.4 COMMENT:** BLM's 59,000-acre Paria-Hackberry wilderness proposal does not preserve the integrity of the entire roadless area. BLM's proposal does include an area which truly deserves wilderness designation, but the proposal should also include another 99,000 acres as outlined in the UWC proposal. [Sierra Club, Cache Group]

**24.4 RESPONSE:** BLM's Proposed Action in the Final EIS has been increased by 35,372 acres to a total of 95,042 acres. See the responses to General Comments 3.1, 3.6, and 3.7.

**24.5 COMMENT:** Removal of Paria River and its bed from wilderness is a travesty and a caving in to ORV interests. The heart of this area is the river



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

which created it. Anywhere else in America, this would be a major national park. [Kim Clegg]

While employed by BLM, I was ordered to draw approximately the recommended partial wilderness boundary. When I asked what the justification was to delete the west side, the administrator laughed and said, "Morgan (Cedar City District Manager, Morgan Jensen) thinks it's too big. I think that comment sums up the overt hostility encountered throughout the entire wilderness inventory process from Cedar City District management.

**24.5 RESPONSE:** While employed by BLM, the commenter was assigned to compile resource data from existing planning documents. He was never "ordered" to draw wilderness boundaries for any WSA in the Cedar City District. A summary or the rationale for BLM's Proposed Action is given in Appendix 11 in Volume I.

**24.6 COMMENT:** Even inside its own WSA boundary, BLM has authorized impairing developments, such as the proposed pipeline down Park Wash to the base of No-Man's Mesa. To facilitate such development, BLM cherry-stemmed an almost invisible jeep trail down Park Wash in drawing its WSA boundary--and then simply eliminated the entire area, including remarkable No-Man's Mesa--from its wilderness recommendation. [Utah Wilderness Coalition]

**24.6 RESPONSE:** No Man's Mesa is included in the BLM Proposed Action in the Final EIS. The boundary determination for the WSA and for BLM's Proposed Action had nothing to do with the pipeline project. The Environmental Analysis for the pipeline project determined that it would be nonimpairing to wilderness values.

**24.7 COMMENT:** Page 1, paragraph 1: The 8,371 acres of State in-holdings do not include the cornered in-holding wrongly excluded on Map 1. State in-holding acreage is 11,912 (surface) and 9,419 (mineral). The same comment applies to page 4, paragraph 3 and page 22, column 2, paragraph 2. [State of Utah]

**24.7 RESPONSE:** All numbers regarding State in-holdings and adjacent sections have been reviewed and revised. Inasmuch as the State has altered its position on wilderness-related land exchanges since the Draft EIS (see Volume I and General Comment Response 6.3), the Final EIS does not treat adjacent (or cornered) State sections in detail and does not as-

sume that in-held State sections would be exchanged. Appendix 3 in Volume I lists in-held State sections in each WSA.

**24.8 COMMENT:** Page 5, Map: The surface of State land shown in T. 40, R. 1 W., sec. 16 was conveyed to the United States; the State retained subsurface. Page 22, column 2, paragraph 2 should be changed. [State of Utah]

**24.8 RESPONSE:** The map and data have been corrected. Also, see the response to Specific Comment 24.7.

**24.9 COMMENT:** The Paria River is not a road and shouldn't split the area into two WSAs. Both sides should be preserved as a single unit, and acreage should be UWC's 158,950, not the 135,822 acres of the WSAs or the pitiful 59,270 acres proposed by BLM. [Eric Johnson]

**24.9 RESPONSE:** The Paria River bed is a traditional travel route during the dry seasons. BLM believes that it should remain open to vehicle use. Signs of vehicle use are eliminated by the annual flood flows. It is not expected that the travel route would become a constructed, all season road.

**24.10 COMMENT:** The recommendation of 59,270 noncontiguous acres wastes the wilderness resource. BLM's recommendation ignores one of the primary values of the Paria-Hackberry; its immense size. It is one of few opportunities remaining to protect wilderness on a grand scale. Wilderness values in the non-recommended portion are diminished by the vastly reduced size and the separation of the recommended parts into three separate, noncontiguous parcels. The dismemberment begins by not recommending Paria River canyon which has undisputed exceptional wilderness values. This decision divides the areas recommended as wilderness into three separate wildernesses. It also denies wilderness protection to the Paria River itself, the major trail to or from many recommended areas. [Utah Wilderness Association]

**24.10 RESPONSE:** See the responses to Specific Comments 24.4 and 24.9. The areas on each side of the Paria River are sufficiently large to protect wilderness values. Also, these areas have high wilderness values. BLM's Proposed Action of 95,042 acres is a reasonable balance between wilderness and conflicting uses.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

**24.11 COMMENT:** According to the Draft EIS, 89,700 acres in Paria-Hackberry have outstanding opportunities for primitive unconfined recreation. This figure places Paria-Hackberry third behind Desolation Canyon and North Escalante in total acres with this characteristic. (Volume I, pp. 91-92). As high as this number is, it probably understates the acreage with outstanding opportunities. The Draft EIS also states that 97,900 acres in Paria-Hackberry have a Class A scenery rating. (Volume III-A, "Paria-Hackberry," p. 19). This is more than North Escalante (Volume III-B, "North Escalante," p. 26) and places Paria-Hackberry in second behind Desolation Canyon in terms of Class A land. Only 3,000 acres in Paria-Hackberry is rated Class "C." (Volume III-A, "Paria-Hackberry," p. 19). Some of the Class "B" and "C" land simply separates one Class A parcel from another. (Id. p. 21). Yet the proposed alternative, the so-called "Paramount" Wilderness Alternative, and the High Quality Alternative each include only 59,270 of Paria-Hackberry's 135,822 acres (Volume I, pp. 25, 30, 40). [David Jorgensen]

**24.11 RESPONSE:** BLM's Proposed Action of 59,207 acres in the Draft EIS has been increased to 95,042 acres in the Final EIS after further consideration of the values noted in the comment and other factors.

**24.12 COMMENT:** Paria-Hackberry is a large WSA where, by BLM's own admission, approximately 90,000 acres are classified as outstanding. In the VRM analysis, about 30,000 additional acres are Class B and only about 3,000 acres are classed as ordinary. It is a WSA that could be a gem of the Utah wilderness system but now has a chopped up recommendation of about 60,000 acres. Because of the overall size of 138,000 acres, Paria-Hackberry could be something that Utah and BLM could be proud of, but instead the small recommendation does not do the land justice. [David Jorgensen]

**24.12 RESPONSE:** See the response to Specific Comment 24.11.

**24.13 COMMENT:** The list of major scenic, biological, and recreational attractions omitted from BLM's Paria-Hackberry wilderness recommendations is long and appalling. [Utah Wilderness Coalition]

a. The Paria River: What can be more important to this wilderness area than the river for which it was named? The Paria is the living heart of this can-

yon system; a magnet for vegetation, wildlife, and humans alike.

b. The White Cliffs Rim: Benchlands above the White Cliffs are an integral and important part of the scenic beauty and biological completeness of this wilderness area. They are the principle habitat for deer and cougar. BLM's "range improvements" proposals would eradicate the pinyon-juniper forest, leaving broken trees scattered over 10 square miles, and forever destroying the wilderness character of the entire western half of the WSA. Large portions of Deer Spring Point, Deer Range Point, and Rock Springs Bench are natural.

c. Paria Tributaries: Some of the most beautiful and exciting canyons in the entire WSA are omitted entirely. The casualties include: Sheep Creek, Willis Creek, Deer Range Canyon, Tank Canyon, Bullrush Gorge, Lick Wash, Kitchen Canyon, and upper Deer Creek Canyon. Each of these are major scenic and recreational features.

d. No Man's Mesa: This virtually impregnable 2,000-acre, forested mesa is an extraordinary recreational and scientific resource. No Man's Mesa has never been grazed by domestic livestock at all, with the exception of one small goat herd which used the northwest tip for a period of no more than a couple of seasons. It is, therefore, one of the largest relict plant areas in the State of Utah--a total of 2,000 acres of classic forest and meadow land which exists, biologically, in a perpetual primeval state. There is diversity and abundance of native grasses and shrubs on the mesa top. Cryptogam growths are five inches high and waist-high clumps of grass--and a luxuriant growth of grass growing, contrary to all popular range management opinion--under the pinyon-juniper overstory. It is astonishing that BLM has omitted No Man's Mesa--and indeed virtually all of the White Cliffs--from its Paria-Hackberry wilderness proposal. The entire area is full of wilderness marvels--each of which, by itself, overwhelmingly outweighs the meager potential of nonwilderness uses.

**24.13 RESPONSE:** See the responses to Specific Comments 24.3, 24.5, and 24.11. Also, see Appendix 11 in Volume I. The various attributes of the Paria River are described throughout the analysis for this WSA. These attributes were considered by BLM in determining BLM's Proposed Action.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

The White Cliffs rim is discussed in Wilderness Values and Geology sections of the analysis. The extent of probable vegetation treatment (removal of pinyon-juniper) has been reviewed and reduced for the No Action/No Wilderness Alternative in the Final EIS.

A portion of Sheep Creek, Deer Range Canyon, No Man's Mesa, and other notable areas are included in BLM's Proposed Action, Partial Wilderness Alternative. As discussed in the Wilderness Values section, areas not proposed for wilderness designation do not meet quality standards or do not exhibit landscape interest of other canyons of the WSA. In essence, these areas are less spectacular than those parts of the WSA proposed for wilderness designation.

No Man's Mesa now is included in BLM's Proposed Action. See the response to Specific Comment 24.43.

**24.14 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future, important, valuable, or critical mineral deposits, and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration. [Utah International, Inc.]

a. On p. 20, BLM claims that the "WSA is natural with only minor imprints of man." This naturalness is one of the primary justifications for proposed wilderness designation. Yet, on the same page BLM also notes that because of the "Paria-Hackberry WSA site characteristics and ease of local access," recreational use in the WSA is primarily nonprimitive in nature; nor, does BLM expect "primitive recreation use (to) . . . increase significantly" even if the area is officially designated as wilderness. Such a finding is not unexpected, considering the fact that more than 33 miles of ORV roads already exist within the WSA. To propose therefore that the WSA be designated as wilderness because of its natural setting seems to be contrary to the actual situation.

b. BLM's analysis of Paria-Hackberry WSA indicates that the Paria River is the primary stream drainage within the WSA. This river is according to the report "one of the major sources of nonpoint salinity and sediment to the Colorado River . . . (carrying) more sediment per acre of drainage area than any other river in the United States" (p. 16). BLM also notes that the existing Management Framework Plan for this area "has identified a number of watershed treat-

ment potentials for this WSA to mitigate erosional problems" (p.16). These land treatment projects would involve some 6,500 acres of land and would include watershed tillage, pinyon-juniper chaining and seeding, and sagebrush control and seeding. Having identified the importance of erosion control in the WSA, BLM then goes on to limit its analysis of the impact of forbidding the use of erosion control (i.e., by designating the area as wilderness) to one paragraph on p. 28. Furthermore, no mention of this impact is made in Table 1 (Summary of Significant Environmental Consequences: Paria-Hackberry WSA).

In light of BLM's own statements on the importance of erosion control, it can only be concluded that the above-mentioned impact analysis does not adequately address this issue and does not support the proposed wilderness designation.

c. Possibly the most important reason for dropping this WSA from inclusion within the National Wilderness Preservation System (NWPS) is the presence of adequate wilderness acreage within close proximity to the WSA. In particular, as noted on page 20, the Paria Canyon-Vermillion Cliffs Wilderness Area is located immediately south of the WSA. The presence and quality of this wilderness area is the primary reason why Paria-Hackberry WSA is not expected to receive significant wilderness-oriented use, even if it is designated as a wilderness area.

**24.14 RESPONSE:** At the present time, there occurs about 500 visitor days of primitive recreation use and about 200 visitor days of ORV recreation use. With the All Wilderness Alternative, primitive-type use could increase. With No Action/No Wilderness Alternative, ORV-type use could increase. Additional discussion of sedimentation and salinity has been included in the Final EIS. See the response to Specific Comment 24.26.

The existing wilderness and/or potential for All Wilderness designation elsewhere in the region is addressed in the Statewide alternatives in Volume I. This does not affect the description and analysis of Paria-Hackberry WSA, nor wilderness values within the WSA. Congress will determine how much wilderness in the region is "adequate."

**24.15 COMMENT:** The heart of the WSA is the Paria River. I simply can't believe BLM proposes to exclude this river and its canyon from proposed wilderness which bears its name. How can this

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

wilderness retain its magnificent opportunities for solitude with an ORV racetrack running right up the center of it? The proposal to cherry-stem the Paria River Canyon is simply preposterous. The Paria River! Off-Road Vehicles? A railroad? The Paria River is a wild and scenic river candidate. BLM is required by law to prohibit impairing developments of such river corridors as long as they remain under study. Therefore, in the Final EIS, BLM should abandon its senseless cherry-stemming of the Paria and incorporate the Paria Box into its recommendation. That is the whole purpose of legislation--to prevent such developments from destroying the nation's last remnants of wilderness. [Raymond Wheeler]

**24.15 RESPONSE:** See the responses to General Comment 4.5. and Specific Comments 24.9 and 24.38.

**24.16 COMMENT:** BLM claims with Arch Canyon that if a single, large WSA is cut into smaller pieces, the wilderness character is compromised and the WSA becomes harder to manage. This contradicts BLM's decision to significantly reduce the size of the Paria-Hackberry WSA. A smaller Paria-Hackberry WSA will hurt the overall natural characteristics of the area. [Sierra Club, Cache Group]

**24.16 RESPONSE:** The situation with Arch Canyon is not the same as with Paria-Hackberry. Arch Canyon is a small unit limited by a State land section, while Paria-Hackberry is a very large unit. See the response to Specific Comment 24.10.

**24.17 COMMENT:** When hiking in a canyon like Paria-Hackberry, many users like to climb to the rims and benchlands in order to explore, enjoy views, and take photographs. For this reason, and also to provide a buffer, it's important to include benchlands along with canyon systems. [Martin Barth]

**24.17 RESPONSE:** BLM's Proposed Action includes benchlands in selected areas with important wilderness characteristics.

**24.18 COMMENT:** ORV use is very destructive to any lands, but especially to semiarid lands such as this. ORVs already have access to too much land as it is. According to BLM's own skewed data (page 26), "primitive recreational use" is currently double that of "recreational activities utilizing vehicular access". Why, then, is it proposed to leave almost two-thirds

of this area open to ORVs? It is simply inexcusable. [Scott DeLong]

**24.18 RESPONSE:** As noted in the Final EIS, about 70 percent (95,042 acres) of the WSA would be closed to ORV use as a result of BLM's Proposed Action for wilderness designation.

**24.19 COMMENT:** Why (on page 26) does the lower amount of visitor days via off-road use out compete the higher number of primitive recreation visitor days? This clearly shows that primitive recreation is higher in this WSA. I do not understand this logic. [Damian Fagan]

**24.19 RESPONSE:** See the recreation portion of Specific Comment Response 24.14. For the No Action/No Wilderness Alternative, it is possible that a higher amount of ORV recreation use may occur if new vehicle access is created with new vegetation treatment projects. The projected use figures for the alternative are based on this assumption.

**24.20 COMMENT:** The upper Paria River is not inside the boundaries of the Paria-Hackberry proposal of BLM. Just a short description of it is 25 miles of wash bottom. It is a canyon that you drive one way, down stream. When you are four wheeling, it is best to be there with somebody else, and it is also best to be there when it is not going to rain. Otherwise, you might get a quick lesson in river running. There are a lot of places and canyons that you can walk, but there are very few that give you an ORV opportunity like Paria Canyon. Hackberry Wash and Wahweap Wash are also passable. I'm not sure how passable or what length Hackberry is. I know Wahweap Wash is a long distance of wash, and it is fairly open. It is not really a prime backpacking area. It is a hot, dry, desolate area, and really I think it would be best preserved but left open for other forms of recreation. This would not preclude anybody who wants to hike in this area. I prefer joint use in several areas where both ORV and hiking opportunities exist. [Dave Jarvis]

**24.20 RESPONSE:** See the response to Specific Comment 24.9. BLM's Proposed Action would allow ORV use and hiking use in the bed of the Paria River.

**24.21 COMMENT:** The next highest rating is for uranium (f2/c2). The Draft EIS acknowledges that even with the All Wilderness Alternative, "the loss of development opportunity for uranium would not be significant." The Draft EIS (Volume I) states that WSAs

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARIJA-HACKBERRY WSA (CONTINUED)**

with "no significant conflict with other resources were generally determined suitable even if they had low wilderness values." Wilderness values in the omitted portions of Paria-Hackberry are generally exceptional. Conflicts with other resources in the omitted portion are insignificant. [Utah Wilderness Association]

**24.21 RESPONSE:** BLM does not agree that the wilderness values are exceptional in the portions of the WSA not proposed for wilderness designation. The text quoted in the comment relative to "no conflict" and "low wilderness values" has been revised and clarified. In some cases, areas with little conflict are not proposed as wilderness solely because of low wilderness values. At Paria-Hackberry WSA, potential conflicts with nonwilderness uses do exist at some locations.

**24.22 COMMENT:** Compared with other WSAs in the region, Paria-Hackberry WSA is considered to rank high in both wilderness values and conflicts. The recommended 59,270-acre Partial Wilderness Alternative mitigates many of these conflicts while retaining most of the high-quality wilderness values. Some conflicts will not be mitigated, notably, the oil and gas potential and land treatments for livestock and wildlife. The Partial Wilderness Alternative would, however, allow for further consideration of coal transportation corridors through portions of the WSA. Future need for an improved highway facility between US-89 and Cannonville through Cottonwood Canyon is evident. Where topography allows, the present roadway should be given a 1/4-mile offset corridor to accommodate this future alignment. [State of Utah]

The State has supported a Research Natural Area designation for No Man's Mesa as proposed in amendments to Vermillion Cliffs Management Framework Plan. This special designation is endorsed by the local county officials and landowners. Such a special designation would have no significant impacts on other resources or land use values.

**24.22 RESPONSE:** Further discussion of transportation corridors and a roadway offset corridor at Cottonwood Canyon is included in the Final EIS. See the responses to General Comments 4.3 and 4.4 concerning road set backs. Also, see the responses to Specific Comments 24.13 and 24.50 regarding No Man's Mesa.

**24.23 COMMENT:** The Draft EIS states that 89,700 acres have outstanding opportunities for primitive and unconfined recreation. It says that outstanding solitude opportunities are present on 89,300 acres. Although such large numbers by themselves would seem to cry out for an even larger recommendation, these figures understate the wilderness resource. For example, the Draft EIS states that 97,800 acres have Class A scenery, yet the acreage providing opportunities for solitude or primitive recreation are not considered outstanding throughout virtually all of the WSA. BLM's own evaluation of scenic quality in Paria-Hackberry WSA justifies an all wilderness designation. [Utah Wilderness Association]

**24.23 RESPONSE:** See the responses to General Comment 8.6 and Specific Comment 24.11. Scenic quality is not the only consideration used in formulating the wilderness Proposed Action.

**24.24 COMMENT:** Page 13, Geology: A discussion of structure or regional setting is lacking. [State of Utah]

**24.24 RESPONSE:** The Geology section has been revised. See the responses to General Comments 11.1 and 11.2.

**24.25 COMMENT:** The Draft EIS greatly exaggerates the salinity problem. The Paria is a salty river, but its discharge is so small that it does not have any meaningful effect on the Colorado River. In a letter dated Oct. 28, 1982, the Bureau of Reclamation's Acting Chief of the Colorado River Water Quality Office wrote as follows: "total dissolved solids in the Paria River usually exceed 1,000 mg/l, but the total flow or runoff from the area during the study period was practically nil. Therefore, the salt load from the Paria River system had virtually little or no effect on the Colorado River during the period of study . . . The Paria River is still considered a source of sediment, but at the time, the amount of salt loading is insignificant as compared to other identified sources." The Draft EIS assertion that the Paria is a major source of Colorado River salinity is not true. The Draft EIS does, however, admit that land treatments BLM has proposed to help with erosion would not make a "measurable" difference in water quality. It doesn't discuss the adverse effect which wilderness designation might have due to foregone land treatments on this insignificant source of salinity would therefore be too small to measure and could easily be offset by the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARIA-HACKBERRY WSA (CONTINUED)**

protection to land wilderness gives. [Utah Wilderness Association]

**24.25 RESPONSE:** The comment may be correct that, during the study period referenced in the 1982 letter, the Paria River salinity contribution was insignificant "as compared to other sources." However, over the long term, the Paria River contributes to the cumulative salinity effect, which is significant. The Bureau of Reclamation records and studies show that the Paria River sedimentation level is high. Description and impact analysis in the Water Resources sections of the Final EIS have been expanded.

**24.26 COMMENT:** Control of problems regarding sediment flow and salinity of the Colorado River have been mentioned as reasons to leave the Paria River undesignated. I believe that these concerns are overstated. The Bureau of Reclamation has never, to my knowledge, suggested a project involving the Paria River. On the other hand, it has been suggested that the entire river be designated under the National Wild and Scenic River System. This area's outstanding natural values far outweigh any considerations of "reclamation." The entire area, less private property and obvious vehicle rights-of-way, should be designated as wilderness. [Mark Peterson]

**24.26 RESPONSE:** The Paria River was not omitted from BLM's Proposed Action because ". . . of problems regarding sediment flow and salinity of the Colorado River . . ." The EIS does include a description of salinity aspects for the wilderness alternatives studied. Also, see the response to Specific Comment 24.38 regarding wild and scenic river status.

**24.27 COMMENT:** The Draft EIS fails to acknowledge that the Wilderness Act permits water conservation projects in the national interest that have Presidential approval. Relatively innocuous land treatments which even arguably might affect Colorado River salinity and our treaty with Mexico would be far more likely to receive such approval than permanently destructive dams. [David Jorgensen]

**24.27 RESPONSE:** The EIS does not fail to acknowledge the Wilderness Act's Presidential authority to approve selected water projects, as this is described as part of the management provisions described in the Introduction to Volume III-A. No such projects are likely for Paria-Hackberry WSA.

**24.28 COMMENT:** We agree with the conclusion that oil and gas resources in WSAs will be essentially forgone under the so-called "preferred alternative." Specifically, our company concludes that inclusion of Paria-Hackberry WSA would adversely affect potential hydrocarbon exploration and development. Enclosed is a geologic overview and critique of Greater Kaiparowits Basin in Southern Utah, prepared by Daniel D. Tisoncik, Senior Staff Geologist, Champlin Petroleum Company. His report cites the 21 million barrel Upper Valley field in Garfield County. [Champlin Petroleum Company]

**24.28 RESPONSE:** The report was reviewed and considered in preparing the revised Minerals and Energy Resources section of the Final EIS.

**24.29 COMMENT:** The WSA has a relatively high overall SAI rating because the rating system discriminates against large areas. The highest rating is f3/c1 for oil and gas. But oil and gas favorability is greater in the recommended eastern portion than in the non-recommended west. In the west, oil and gas rating drops to f2/c1. [Utah Wilderness Association]

**24.29 RESPONSE:** BLM believes that high wilderness values outweigh potential for mineral discovery and extraction in the portion of the WSA included in BLM's Proposed Action.

**24.30 COMMENT:** Discussion of the No Action/No Wilderness Alternative states that "Overall there would be a positive effect (sic) on wildlife due to creation of improved and varied habitat." This statement is not true for all wildlife. The species to which the statement applies should be specified with appropriate supporting citations or data. [Scott Mills]

**24.30 RESPONSE:** The main species that would benefit have been noted in the revised text of the Final EIS. Also see the response to General Comment 16.1.

**24.31 COMMENT:** The White Cliff Rim should be included since the pinyon-juniper forest is the principle habitat in the area for deer and cougar. Wilderness designation will protect this valuable wildlife resource. [Sierra Club, Cache Group]

**24.31 RESPONSE:** Deer habitat can be managed and protected without wilderness designation. In some cases, protection and enhancement of deer habitat necessitates forage projects which would be prevented by wilderness designation.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

**24.32 COMMENT:** The locatable minerals discussion in the Draft EIS was incomplete. [Utah International Inc., and Bureau of Mines]

a. According to industry sources, this WSA is considered to have a low potential for future mineral development based on current understanding of the geology and mineral content. However, further detailed field investigation and sampling programs should be completed on the area prior to wilderness designation. The detailed work and additional review process may move the rating into the higher potential categories. The following information is provided for BLM's consideration. There is potential for gold, silver, uranium, vanadium, copper, and gypsum.

b. The Draft EIS reports the Chinle and Moenave Formations favorable for uranium (p. 18, Vol. III-A) in the study areas. Our field investigation and literature search (report in progress), however, indicate that the uranium potential is low in these formations. The formations do not contain greater concentrations of uranium than the Navajo or Carmel Formations, neither of which is considered favorable for uranium deposition in the study areas. Analyses of stream sediment samples do not indicate that uranium deposits occur in the WSA.

Nineteen mining claims are reported in the northeastern part of the WSA, and 20 additional claims are reported in the same area along the boundary of the WSA (DEIS, p. 19, Vol. III-A). Our investigation indicates that as of October 1984, there were no mining claims in the WSA. At that time, there were 149 claims within 6 miles of the WSA. The claims were located north, northeast, and southwest of the WSA.

**24.32 RESPONSE:** The locatable minerals sections have been revised for the Final EIS. See the response to General Comment 15.1.

The EIS indicates that the WSA is not favorable for significant deposits of uranium. The mining claim situation changes continuously because claims can be located up to the time of designation. At the time the Final EIS was prepared, there were four mining claims inside the WSA.

**24.33 COMMENT:** Land treatments for grazing and water improvement projects are treated as conflicts in the EIS. According to the Draft EIS: "About 6,000 acres of proposed land treatments would be in the non-designated portion and could be allowed" (page 14). If

this land were designated wilderness, existing grazing would still be allowed. I have no quarrel with this as long as it is not destroying the land (i.e., there is no overgrazing). It is precisely this overgrazing, however, along with irrigation of desert lands that is contributing to the salinity problem in the Paria and Colorado Rivers. By chaining over 10 square miles of new land for additional grazing, you would merely be compounding the problem. The other pertinent question, of course, is: Is it economically beneficial and necessary? The answer is: NO! Your own figures show that ranching contributes less than 3 percent of the personal income of Kane County residents. Your proposal would benefit only about a dozen ranchers at most. Even heavily subsidized as it is, the ranching business is just not a major factor in this arid, submarginal grazing area. Once again, show me that this is one of the most productive grazing areas in the U.S., and I will support it as a grazing area. YOU CANNOT DO IT!! I support protecting the ranchers existing leases. Designating the entire 158,750-acre Paria-Hackberry WSA as wilderness would do just that---and no more. [Scott Delong]

**24.33 RESPONSE:** Livestock grazing is one aspect of multiple use management and is permitted (with restrictions) in wilderness areas. Chaining projects would not be permitted in WSAs or in designated wilderness areas. Range projects are carried out only if it is expected that positive economic benefits can be attained and/or if other resource purposes (such as wildlife browse rejuvenation) can be achieved.

**24.34 COMMENT:** We are concerned about the planned 13,800-acre pinyon-juniper chaining and livestock range improvement project for this WSA. Is this the real reason why BLM wants to reduce this WSA's size? The money which BLM will spend on this project should be directed to similar activities in less sensitive areas. Wilderness values found here are truly more valuable than any potential economic gain from additional livestock usage. [Sierra Club, Cache Group]

**24.34 RESPONSE:** See the response to Specific Comment 24.33.

**24.35 COMMENT:** On page 19 of the Draft EIS, 97,800 acres are said to have Class A visual resource classification while on page 22 only about 59,300 acres are credited with scenic values. [Michael Van Note]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARIA-HACKBERRY WSA (CONTINUED)**

**24.35 RESPONSE:** The text has been clarified to provide consistent information.

**24.36 COMMENT:** Page 22, Column 1: A number of high-value scenic areas are identified. Are these areas included in BLM's Proposed Action (Partial Wilderness)? [State of Utah]

**24.36 RESPONSE:** The majority of the highly scenic areas identified in the description of visual resources are included in BLM's Proposed Action.

**24.37 COMMENT:** Important petroglyphs have not received adequate protection in BLM's Proposed Action. These ancient artworks can be found in Deer Creek and Snake Canyons. [Sierra Club, Cache Group]

**24.37 RESPONSE:** The artwork in the two canyons has been mentioned in the text. Protection of such resources does not necessarily require wilderness designation. See the responses to General Comments 9.6 and 20.2.

**24.38 COMMENT:** BLM also mentions relative lack of knowledge of this WSA as compared to Paria Vermillion Cliffs Wilderness. With an ever-increasing visitor load of the existing wilderness, wouldn't Paria-Hackberry WSA make a perfect alternative for overflow visitors? [Dean Petaja]

**24.38 RESPONSE:** With or without wilderness designation, Paria-Hackberry WSA provides alternative opportunities for visitors who are accustomed to using other areas. The text describes opportunities for recreation activities such as hiking, photography, camping, etc.

**24.39 COMMENT:** BLM is also obligated to mitigate or prevent impacts which would foreclose wild and scenic or recreational river status. Keeping the river bottom open to ORV use cannot possibly be consistent with this obligation. [Dean Petaja]

**24.39 RESPONSE:** Traditional vehicular use of the Paria River bed was occurring at the time that the stream was identified by National Park Service as part of the nationwide inventory of potential wild and scenic rivers. By allowing use to continue with BLM's Proposed Action, BLM would not be changing the status of the river corridor; consequently, it would not be taking new action which would foreclose on opportunities for future consideration of the river under the Wild and Scenic Rivers Act.

**24.40 COMMENT:** The Draft EIS states, "WSAs contain about 2 percent of the State total of ORV trails . . . the total miles of ORV routes within WSAs would remain relatively small when compared to the total miles within southern Utah and the State as a whole" (Vol. 1, page 185). Yet, several times the Draft EIS uses ORV use to justify a nonwilderness recommendation. Since wilderness designation will not adversely affect ORV recreationists, BLM should discount any ORV use concerns and actively pursue enforcement of regulations that keep ORVs out of wilderness areas. [Sierra Club, Cache Group]

**24.40 RESPONSE:** While wilderness designation would not significantly affect ORV use on an overall basis, specific localized areas may be affected. BLM has considered both the Statewide and the specific individual areas in the EIS analysis and in formulating BLM's Proposed Action.

**24.41 COMMENT:** The statement, "BLM recreation specialists in Utah identified only two areas with important nonmotorized--motorized recreation use conflicts: Moquith Mountain and Crack Canyon" (Draft EIS, Volume I, p. 89). This brings into question BLM's exclusion of acreage in many areas because of ORV conflicts, particularly Paria-Hackberry WSA. [Utah Wilderness Association]

**24.41 RESPONSE:** There currently is no substantial conflict between ORV use and primitive recreation use within the Paria-Hackberry WSA. As discussed in the EIS narrative, both uses now occur in relatively low numbers. Also, the ORV use is mostly within the Paria Box which has little primitive recreation use. See the response to Specific Comment 24.40.

**24.42 COMMENT:** This vast area would be decimated under BLM's Proposed Action. The obvious management alternative includes it in its entirety, the logical extension of Bryce Canyon National Park back country with upper Paria Canyon systems, that remarkable section of Utah which offers days to weeks of exceptional canyon and range hiking, gentle enough for the infirmed and aged, spectacular, mild in winter, a truly different and necessary addition to the National Wilderness Preservation System. [Lucille Wagner]

**24.42 RESPONSE:** The regional setting has been described and considered with respect to the Paria-Hackberry WSA.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

**24.43 COMMENT:** BLM's Cedar City District has consistently shown its anti-wilderness bias all through the wilderness study process. This negative bias is shown in the form of a perverted definition of solitude. The District uses topographic and vegetative screening as the sole determinant for the presence of solitude. The Wilderness Inventory Handbook (1978) defines solitude as "the state of being alone or remote from others; isolation. A lonely or secluded place." One of the elements influencing solitude is "natural screening"; it is not the sole determinant. For instance, it is absurd for BLM to state that only 66 percent of an area 23 miles by 19 miles has outstanding opportunities for solitude (the Paria-Hackberry WSA). How many miles am I supposed to hike before I find outstanding isolation? All WSAs in Cedar City District should be reevaluated using the proper definition of solitude. [Owen Severance]

**24.43 RESPONSE:** Volume I identifies the five features considered in determining outstanding opportunities for solitude. In many WSAs, BLM recognizes that there is a difference between "solitude" and "outstanding solitude." Applying the concept of solitude to each of the WSAs has required individual judgment on the part of the many different people involved in the wilderness study. In the case of Paria-Hackberry WSA, interpretation and judgments were made which determined that every acre of the WSA is not outstanding for solitude. See the responses to General Comments 3.1, 8.11, and 23.1.

**24.44 COMMENT:** The statement helps create the mistaken impression that much of the nonrecommended area does not have outstanding wilderness values. It may well be true that the preliminary recommendation includes over 50 percent of the "most outstanding" wilderness land, although it is impossible to tell whether or not over 50 percent of the Class A land is within the recommendation. But the impression that the land with admitted outstanding wilderness values is largely located in any particular part of the WSA is contradicted by the agency's own prior evaluations. The Draft EIS description of wilderness values in the nonrecommended parts of the WSA could lead the casual reader to believe that most of the land in the nonrecommended part of the west half of the unit is not that outstanding. In part, such an impression is likely to be created because the Draft EIS names only three areas in the nonrecommended part of the west half that are left out. [David Jorgensen]

The three such areas that are named are: No Man's Mesa, Deer Range Canyon, and Tank Canyon. To compound the problem that one unfamiliar with the area would have in analyzing the Draft EIS, the Draft EIS map places these areas in the wrong locations. The locations shown on the map suggest that the three named areas are isolated from each other and that there may have been a good reason to exclude them. No Man's Mesa and Deer Range Canyon shown on the Draft EIS' map are different from those discussed in the text. The map shows Deer Range Canyon, located south of the chain of in-holdings, in an area that the text describes as generally unremarkable. The chain of in-holdings is a tempting boundary. Looking at the map, one might easily conclude that the area was left out for manageability reasons as well as lack of wilderness values. No Man's Mesa depicted on the Draft EIS map is a small knob south of Starlight Canyon on the WSA's border. Again, a casual reader could easily conclude that the important No Man's Mesa is isolated in a relatively unremarkable area. In reality, however, No Man's Mesa and Deer Range Canyon discussed in the text are part of an outstanding complex of mesas and canyons north of the chain of in-holdings.

**24.44 RESPONSE:** Several non-EIS maps have two locations labeled as No Man's Mesa and Deer Range Canyon. The maps used in the Final EIS have been labeled to emphasize the locations most commonly known by these names and to be consistent with the text. Both of these areas now are included in BLM's Proposed Action. See the response to Specific Comment 24.11.

**24.45 COMMENT:** The maps and verbal descriptions of wilderness values in the Draft EIS are so limited that to the "average reviewer" it is impossible to determine what the omitted areas are like. This glaring insufficiency exists even though BLM prepared a Study Phase Technical Report which describes the WSA in much more detail. Additionally, the Site Specific Analysis (SSA) prepared just prior to the Draft EIS had a map which illustrated those areas that BLM felt had outstanding wilderness values. The Study Phase Report and the SSA map show that BLM recognizes that most of the omitted parts have outstanding wilderness. An omitted area in the easternmost part of the WSA deserves mention. This area is the Rush Beds. BLM concludes that this area does not offer outstanding opportunities for solitude. But the colors are so brilliant and the geography so intriguing that the Draft EIS does admit that there are

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARIA-HACKBERRY WSA (CONTINUED)**

outstanding opportunities for primitive recreation.  
[Utah Wilderness Association]

**24.45 RESPONSE:** See the response to General Comment 26.1.

**24.46 COMMENT:** As part of the review process, BLM prepared a Study Phase Technical Report. To emphasize the fact that outstanding wilderness values exist throughout the WSA, and not just in particular portions of the WSA, this report quoted the following from a prior decision of BLM Utah State Director: "There is a diversity of outstanding scenery and features throughout the area. There are no individual features which would tend to draw visitors to a particular part of the unit . . . Each of the major drainages contain numerous side canyons which offer equally outstanding hiking opportunities . . . each of the major drainages contain numerous side canyons which offer equally outstanding solitude opportunities . . ." Prior BLM studies recognize that the entire area where these landforms are located has outstanding wilderness values. The SSA, originally prepared by Cedar City District, had a map not duplicated in the Draft EIS that would allow one to point out the "most outstanding" areas. (A copy of this map was attached to the comment but not reproduced for the Final EIS.) The Study Phase Report and the SSA map show that the following nonrecommended areas in the west are outstanding either for solitude, primitive recreation, or (usually) both: Sheep Creek; Willis Creek; the part of Park Wash located north of the chain of in-holdings; Lick Wash; Deer Spring Wash; Wilsey Hollow east to the Paria River including Kitchen Canyon; the area south of the Starlight Canyon recommended area; and the area connecting Deer Range Canyon, No Man's Mesa, Park Wash, Deer Creek, Range Point, and the recommended area around Bull Valley Gorge. Except for transition zones between such areas, the only area west of the Paria River which BLM has not acknowledged at one time or another as having outstanding wilderness values is the extreme southwest corner of the WSA south of the chain of in-holdings and west of Starlight Canyon area. [David Jorgensen]

**24.46 RESPONSE:** BLM's Proposed Action for the Final EIS includes many of the locations mentioned in the comment. Included are Bull Valley Gorge, Deer Creek Canyon, Deer Range Point, Deer Range Canyon, No Man's Mesa, Starlight Canyon, Pilot Ridge, and several connecting areas. Refer to Map 3 in the Paria-Hackberry portion of Volume III-A.

**24.47 COMMENT:** The southwestern portion of the WSA which BLM proposed to eliminate from wilderness designation is characterized by towering cliffs, canyons, and with vegetation enough to allow amply for solitude. Outstanding? When I was hiking just west of Mollies Nipple, I could only rarely see other members of my own hiking party. I was not likely to see or hear anyone much over a hundred yards away due to topographical and vegetative screening. I would consider that to be outstanding. Where large cliffs and canyons exist in the southwest part of the WSA, solitude is simply all the more outstanding as is the scenery and recreational opportunity. The All Wilderness Alternative is the only sensible and logical alternative for an area with such outstanding diversity and opportunities for wilderness activities and the quiet contemplation of natural solitude. [Raymond Wheeler]

**24.47 RESPONSE:** See the responses to Specific Comments 24.15 and 24.39. The acreage added to the BLM Proposed Action for the Final EIS is west of the Paria River, primarily in the southwest part of the WSA.

**24.48 COMMENT:** The coal corridor conflict is insignificant. Several proposed transportation routes for Kaiparowits coal would pass through some parts of the WSAs. Evidently, the Draft EIS does not consider this a real problem because it does not describe where these routes would be, and it does not discuss the necessity of routes through WSAs opposed to alternatives. Alternatives, such as Cottonwood Wash, do exist. If alternatives did not exist, one would at least expect an explanation as to why in the Draft EIS. [Utah Wilderness Association]

**24.48 RESPONSE:** See the responses to General Comments 8.18 and 23.2.

**24.49 COMMENT:** A coal transportation corridor would be extremely destructive to wilderness attributes. Were alternative routes studied in Kane County Master Plan? (See p. 15) Could they be substituted? [Martin Barth]

**24.49 RESPONSE:** "Kaiparowits Coal Development and Transportation Study for Southern Utah" was completed by Environmental Research and Technology, Inc., for the mutual planning benefit of BLM, NPS, and the State of Utah. It was not a function of the Kane County Master Plan. Also, see the responses to General Comments 8.18, 23.2, and the coal transpor-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

tation study document (listed in the bibliography and available for use in BLM's Cedar City District library).

**24.50 COMMENT:** According to the EIS analysis, there would be conflict with a coal transportation corridor and a rail line proposed through this WSA. Also there is "moderate" potential for oil and gas in the area. If the Alton and Kaiparowits coal fields are ever developed, an alternate route should be selected over this highly scenic wilderness area in the shadow of Bryce Canyon National Park. The proximity of the park will probably (and should) prevent any development of the Alton coal field. A "transportation corridor" through this beautiful area would be shortsighted and unnecessary. The Colorado Plateau of southern Utah and northern Arizona contains the most beautiful desert scenery in North America and probably the world---bar none. The entire plateau has been nominated for World Heritage status. BLM is charged with determining the "clear and best use" of the lands under your jurisdiction. This area has some of the best scenery and opportunities for solitude and recreation in the world! You will have to show me that this area has the largest and potentially most profitable oil and gas fields in the United States before you can convince me that is the best use for this land. "Moderate" potential for a small amount of oil and gas does not justify destroying one of the few remaining large wildernesses in the United States. The highest and best use of this world resource is as wilderness. [Scott DeLong]

**24.50 RESPONSE:** The coal resources of the region are potentially important because of the large deposits, although mining is not projected to occur in the short term. Transportation is and will continue to be a substantial factor in the long term. Although coal resources are not found in the Paria-Hackberry WSA, the transportation routes available for coal from adjacent areas must be considered. Oil and gas resources in the WSA are low to moderate and are not an overriding conflict in determining BLM's Proposed Action.

**24.51 COMMENT:** Page 21, Special Features: There should be a discussion of the proposal to amend the Vermillion Cliffs Management Framework Plan to designate No Man's Mesa as a Research Natural Area. The State has endorsed the proposal in recognition of the unique values of the relict plant associations found in the area. [State of Utah]

**24.51 RESPONSE:** No Man's Mesa Research Natural Area was designated in September 1986. While this designation recognizes the relict vegetation values, it is not equivalent to wilderness designation. An RNA is established by BLM as part of the land use planning mandate while designation of an area as part of the National Wilderness Preservation System is established by Congress through enactment of specific wilderness legislation.

**24.52 COMMENT:** Recent controversy has occurred over leasing of public lands for grazing. It is fairly clear that many ranchers benefit from an arrangement whereby the government (i.e., the taxpayers and actual owners of public lands) provides roads, fences, etc., to those who lease the land for their cattle. The situation is simply not in the best interest of the majority of citizens. The small number of ranch operations in the Paria River WSA provides only a small amount of the surrounding county's revenue. Tourism which would result from greater accessibility to this area, as a result of wilderness designation, may be expected to surpass this amount easily. Several business operators in Kanab have mentioned to me how they scorn "environmentalists" for supporting wilderness at their expense. When I ask them what, specifically, they expect to lose as a result, however, they never can seem to answer adequately. At the same time, I am invariably standing there, in their store, spending my California money. The logic of it all escapes me. [Mark Peterson]

**24.52 RESPONSE:** Economic impacts from wilderness designation have been estimated for the Paria-Hackberry WSA in Volume III-A. Impacts to the county and the region from Statewide alternatives are estimated in Volume I. In general, wilderness designation would have little negative impact to livestock economics and little positive impact to tourism economics. See the responses to General Comments 24.3, 24.4, 24.8, 24.14, and 24.17.

**24.53 COMMENT:** Page 18 Leasable Minerals: The oil and gas discussion is well done. [State of Utah]

**24.53 RESPONSE:** Comment noted.

**24.54 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 24: PARI-HACKBERRY WSA (CONTINUED)**

Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**24.54 RESPONSE:** See the response to General Comment 14.27.

**SECTION 25**  
**THE COCKSCOMB WSA**

**25.1 COMMENT:** This WSA contains important and unique cockscomb formations which will receive the best protection through wilderness designation as proposed by the Utah Wilderness Coalition. [Utah Wilderness Coalition]

**25.1 RESPONSE:** See the responses to General Comments 3.1, 3.6, and 3.7.

**25.2 COMMENT:** You state the east boundary is the Cottonwood Road, yet much of the boundary is well west of the road. Why? [Kim Clegg]

**25.2 RESPONSE:** The east boundary is either the Cottonwood Road or the existing powerline right-of-way, which at times is west of the Cottonwood Road. The text has been revised to clarify the situation.

**25.3 COMMENT:** The narrative should state that upon wilderness designation the area will be closed to further mining claim location. The same addition needs to be included under the Partial Wilderness Alternative. [Agency comment]

**25.3 RESPONSE:** The text has been revised as suggested. Also, see the response to General Comment 1.13.

**25.4 COMMENT:** While the preliminary recommendation for partial wilderness meticulously avoids conflicts with other resources, it fails to preserve important wilderness values. The Draft EIS consistently notes the beauty of the Rimrocks area, but that tract

is excluded from the suitability recommendation. Thus, BLM's recommendation is inconsistent. The study policy requires consistency. [Utah Wilderness Coalition]

**25.4 RESPONSE:** The Rimrocks area was not included in BLM's Proposed Action in order to reduce potential conflicts with other resources and land uses. The Proposed Action is not inconsistent with the study policy. The policy does not require that wilderness values be given priority over conflicting uses. See the responses to General Comments 8.6, 8.20, and Appendix 11 in Volume I.

**25.5 COMMENT:** The Paria-Hackberry and Cockscomb WSAs should not be separated. [Jean Soko and Michael Van Note]

a. The 4,980 acres not recommended by BLM are not as spectacular as the recommended portion; however, this WSA forms a link between the Paria wilderness and the Paria-Hackberry WSA. Also, the Paria River has been identified by the National Park Service as a candidate Wild and Scenic River. The river and its floodplain should not be excluded for a water storage project which could preclude the river for designation as Wild and Scenic. The entire length of the Paria River canyon and its tributaries are worthy candidates for wilderness. This area represents the best that the Colorado Plateau has to offer. BLM should let Congress make decisions about development, including water storage and the transportation corridor and wilderness.

b. BLM has identified many of the outstanding characteristics of this WSA in the Draft EIS. My only addition would be to include the southeast portion of the WSA in the proposal (i.e., favor the All Wilderness Alternative) as the badlands and fossils within this portion of the WSA are of sufficient interest to include within the proposed wilderness. Again I urge reconnecting this WSA with the Paria-Hackberry WSA, eliminating the rights-of-way, and making the entire area a designated wilderness area.

**25.5 RESPONSE:** The Cockscomb WSA does not form a complete link between the two areas mentioned due to existing intrusions and intervening lands; however, it has been included in the Cluster Concept Alternatives in Volume 1. Congress will make the decisions regarding wilderness, wild river designation, or release for other management options.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 25: THE COCKSCOMB WSA (CONTINUED)**

**25.6 COMMENT:** Leaving out the Paria River is tantamount to tearing the guts out of the area. Any reservoir on the extremely silt-laden Paria River would be useless in a very short time. Yet this is apparently the only reason for "subdividing" this area. [Kim Clegg]

**25.6 RESPONSE:** The rationale for BLM's Proposed Action is summarized in Appendix 11 in Volume I. The suggested reservoir was not a major factor in determination of the Proposed Action.

**25.7 COMMENT:** When compared to other WSAs in the region, The Cockscomb WSA is considered to have high quality wilderness values and moderate conflicts. The adjacent Paria-Hackberry WSA is a natural continuation of the wilderness values found in The Cockscomb WSA. Because of the small, narrow size of this WSA and the fact that it is surrounded on all sides by roads, manageability of this WSA might be a problem. This issue requires more analysis, but it appears that impacts from a partial wilderness designation on other resources and land uses would be low. [State of Utah]

**25.7 RESPONSE:** The Proposed Action for The Cockscomb WSA would complement the Proposed Action for the Paria-Hackberry WSA. BLM believes that manageability would not be a problem for the proposed Partial Wilderness Alternative of 5,100 acres for The Cockscomb WSA.

**25.8 COMMENT:** The agency's partial suitability recommendation is designed to eliminate conflicts with such resources as mining claims and coal. The boundaries were even adjusted to draw out conflicts with Paria River ORV traffic. The SSA does not deal with the question of whether or not any of these developments are feasible. The analysis of hydrocarbon and other minerals development should address whether extraction is commercially viable, whether extraction methods, such as underground mining, are possible which would not cause surface disturbances, and whether equal or better opportunities for development are available outside the WSA on other public or private lands. As for the ORV conflict, BLM has provided plenty of acreage elsewhere for ORV play. The analysis of wilderness values in The Cockscomb WSA Draft EIS needs improvement. Besides a sketchy justification for these statements, the Draft EIS does not provide a map which locates these areas within the WSA. BLM documents no method to determine which areas have these ratings. The Draft EIS has no de-

scription of any method to rate wilderness values; only the conclusions appear. In absence of methodology and a description of its application, BLM's conclusions must be taken as arbitrary. [Utah Wilderness Coalition]

**25.8 RESPONSE:** See the responses to General Comments 8.3, 8.11, 8.12, 8.14, 8.19, 9.10 and 15.20.

**25.9 COMMENT:** Lack of screening and speculative mineral values have been used to reduce the size of the wilderness proposal. All of the WSA should be recommended for wilderness. [Owen Severance]

**25.9 RESPONSE:** See the responses to General Comments 8.3 and 22.5.

**25.10 COMMENT:** The analysis should analyze impacts on State land. [State of Utah; Sierra Club, Cache Group]

a. There are no private or State land conflicts present in this WSA.

b. The WSA boundary extends over three sections in which the State owns the minerals (see Volume I, page 297). The existence of State mineral in-holdings affects the text of page 4, No Action Alternative, paragraph 1 and dot 1; page 5, Map 1; page 6, paragraph 1 and dot 1; page 8, dot 4, Partial Wilderness Alternative, paragraph 1 and dot 1; page 10, dot 8, page 19, Land Use Plans and Controls, paragraph 1; page 13, Land Use Plans and Controls; page 22, Locatable Minerals; page 24, All Wilderness Alternative, paragraph 1; page 26, Land Use Plans and Controls; and, page 29, Land Use Plans and Controls. BLM was provided with the information on State mineral in-holdings during the State's review of the SSAs. Is there a question as to ownership, or are these unintentional omissions? [State of Utah]

**25.10 RESPONSE:** Land ownership records have been reviewed and The Cockscomb WSA Map 1 and corresponding text have been corrected to show the split-estate (State-owned minerals). The information inadvertently was omitted. In addition to the minerals, the State retained highway rights-of-way through two of the sections. Only a portion of each of the three sections is within the WSA.

**25.11 COMMENT:** Geology, Paragraph 2: The designation "the Cockscomb formation" makes this sound

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 25: THE COCKSCOMB WSA (CONTINUED)**

more like a lithologic unit than a topographic feature. [State of Utah]

**25.11 RESPONSE:** The text has been clarified.

**25.12 COMMENT:** Geology Paragraph 3: The Navajo Formation is Triassic/Jurassic in age. [State of Utah]

**25.12 RESPONSE:** The text has been clarified.

**25.13 COMMENT:** Exxon believes that several areas, including The Cockscomb WSA, contain geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many WSAs identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geologic data which lead us to this recommendation. [Exxon Corporation]

**25.13 RESPONSE:** BLM has reviewed the available information and has concluded that The Cockscomb WSA is unlikely for oil and gas resources. Consequently, the assumed Action Scenarios are based on the assumption that exploration for and recovery of oil and gas resources will not occur in that WSA. The analysis indicates that wilderness designation would have no significant impact on oil and gas activities.

**25.14 COMMENT:** The potentials of oil and gas deposits in this WSA are overrated compared to the unique wilderness characteristics found here. For the most part, there are no significant wilderness conflicts in this area. The Draft EIS says that mineral potentials are unfavorable here. [Sierra Club, Cache Group]

**25.14 RESPONSE:** See the response to Specific Comment 25.13.

**25.15 COMMENT:** No coal analyses are available and coal quality is unknown; this should be determined. The Draft EIS states "it is unlikely any of the coal

within the WSA is potentially developable"; the unit is not favorable for uranium deposits. The potential for oil and gas is favorable for small to moderate field with a low certainty of occurrence. [Kim Jennyson]

**25.15 RESPONSE:** Studies of the Kaiparowits coal field have been done and available data has been used in the EIS (e.g., Doelling and Graham, 1972). It is recognized that data are general in nature. However, enough is known to delineate the boundaries of the field and general qualities of the coal. The Cockscomb WSA is located on the western edge of the coal field where coal quantity is less than in other areas. BLM does not project development of the coal resource in The Cockscomb WSA even with the No Action/No Wilderness Alternative. Coal mining would be more likely in other areas of the Kaiparowits Plateau where the coal is more abundant.

**25.16 COMMENT:** Page 12, Table 1: The table gives no relative coal impacts for the All Wilderness and Partial Wilderness alternatives. [State of Utah]

**25.16 RESPONSE:** There are no existing coal leases in The Cockscomb WSA, and wilderness designation would preclude any new leases. Therefore, wilderness designation would prohibit the exploration for and extraction of any coal resource located in the WSA. However, it is expected that this would not be a significant impact as the WSA is along the western edge of the Kaiparowits coal field where coal quantity is relatively low. BLM believes that other more favorable parts of the coal field could be developed in the long term, instead of The Cockscomb WSA. For these reasons, the projected impacts are not included in the "Summary of Significant Environmental Consequences."

**25.17 COMMENT:** The discussion of the All Wilderness Alternative states that elimination of a potential reservoir on the Paria River would adversely affect wildlife. This statement is too broad and unsubstantiated. The Draft EIS does not contain impacts of the preferred alternative on wildlife. It is incorrect to say that the impacts would be the same as with the All Wilderness Alternative because the proposed reservoir in the Partial Wilderness Alternative would be at least one major difference between these two alternatives. [Scott Mills]

**25.17 RESPONSE:** The text referred to indicated that water is a limiting factor in the WSA and that elimination of the potential reservoir on the Paria River

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 25: THE COCKSCOMB WSA (CONTINUED)**

would adversely affect wildlife. See the response to General Comment 16.12.

**25.18 COMMENT:** BLM does not identify two threatened animals found in this WSA. [Sierra Club, Cache Group]

**25.18 RESPONSE:** The "threatened" species alluded to in the wildlife narrative actually are "endangered" species as noted elsewhere in the text. The wildlife narrative has been corrected in the Final EIS.

**25.19 COMMENT:** Information on cultural resources is weak or nonexistent. Statements of minimal conflict with cultural resources are not supported in the Draft EIS. [State of Utah]

**25.19 RESPONSE:** The most up-to-date information on cultural resources has been included. See the responses to General Comments 20.2 and 22.1.

**25.20 COMMENT:** The Paria River, which has been proposed for National Wild and Scenic River status, flows through this area. Wilderness designation for The Cockscomb WSA, as proposed by the UWC, will best protect this river segment. [Sierra Club, Cache Group]

**25.20 RESPONSE:** The EIS recognizes the inventory status of the Paria River as consistent with the Wild and Scenic Rivers Act.

**25.21 COMMENT:** The Draft EIS states the WSA meets the solitude requirements for wilderness in only 43 percent of the WSA. The 57 percent which do not meet the requirements are not identified. Again, topographic and vegetative screening are used to identify solitude; BLM has confused this with isolation or lack of habitation as defined in Volume 1, page 217. Also, the Draft EIS identifies only 44 percent of the WSA as meeting wilderness standards for primitive recreation. The Draft EIS does not state why this is so; the entire WSA contains primitive recreational opportunities which include rockhounding, geologic and scenic sightseeing, painting, and photography. Backpacking into the adjacent Paria-Hackberry WSA is also possible. [Kim Jønnysen]

**25.21 RESPONSE:** The EIS indicates that 43 percent of the WSA has outstanding solitude and 56 percent of the WSA has outstanding opportunities for primitive recreation. Other portions of the WSA have solitude and recreation opportunities which were not

determined to be "outstanding." See the response to Specific Comment 24.42.

**25.22 COMMENT:** Numerous scenic canyons provide impressive and outstanding opportunities for primitive outdoor recreation and solitude, contrary to BLM's conclusions. [Sierra Club, Cache Group]

**25.22 RESPONSE:** The EIS cites that outstanding opportunities for solitude and primitive recreation are found in the Cockscomb and Rimrock areas and, more specifically, in the various side drainages and canyons.

**25.23 COMMENT:** The preliminary recommendation is inconsistent with the Kane County Master Plan. As pointed out in the EIS, Kane County has adopted a policy against wilderness designations anywhere at any time. Under those circumstances, BLM's consistency or inconsistency with the county plan can hardly be taken seriously as a factor or issue. [Utah Wilderness Coalition]

**25.23 RESPONSE:** BLM study policy requires that "consistency with other plans" be considered and documented. This does not mean that BLM's Proposed Action must always be identical with, or closely follow, the officially approved and adopted plans of Federal agencies, State and local governments, and Indian tribes; but it does necessitate that these be included in the analysis process.

**25.24 COMMENT:** The conflicts proposed are a transportation corridor to the undeveloped Kaiparowits Plateau. This corridor is 7 miles wide as proposed. BLM has no corridor proposed as part of its planning process. Deletion of areas for proposed corridors where there has been no determination of which route is preferred or how much of the route is needed does not adequately assess the conflict. [Utah Wilderness Coalition]

**25.24 RESPONSE:** The Kaiparowits Coal Development and Transportation Study was completed in August 1980. It is a planning document prepared for BLM, National Park Service, and the State of Utah. It was prepared to identify and analyze the potential routes and impacts from various levels of coal production and various modes of coal transportation from the Kaiparowits region. It addresses several alternatives, primarily on a conceptual basis. More detailed description and analysis will not be done until specific coal project proposals and right-of-way

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 25: THE COCKSCOMB WSA (CONTINUED)**

applications are available. The potential conflict between wilderness and coal transportation is assessed in the EIS, based on the best information currently available. Also, see the responses to Specific Comments 24.48, 24.49, and 24.50 and General Comments 8.18 and 23.2 also address the transportation corridors.

**25.25 COMMENT:** A 230 kV transmission line scheduled for upgrading to 345 kV traverses portions of the northeasterly border of The Cockscomb WSA. A maintenance corridor must be preserved through this WSA. [Utah Power and Light]

**25.25 RESPONSE:** At the present time there is a 130-foot-wide right-of-way for the powerline. This should be sufficient for maintenance purposes. If the proposed area is designated wilderness, no construction or maintenance activities would be allowed in the wilderness; however, the existing right-of-way would not be part of the wilderness area.

**25.26 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**25.26 RESPONSE:** See the response to General Comment 14.27.

**SECTION 26**  
**WAHWEAP WSA**

**26.1 COMMENT:** While we support the All Wilderness Alternative of 134,000 acres of the WSA, we also strongly recommend that BLM identify a Partial Wilderness Alternative. The agency's failure to de-

velop such an alternative represents a significant omission that should be rectified in the Final EIS for more full analysis. [Marvin Poulson]

**26.1 RESPONSE:** Both the Draft and the Final EIS contain a Partial Wilderness Alternative. There is no omission which prevents full analysis.

**26.2 COMMENT:** The Proposed Action alternative does not include Four Mile Bench within the boundaries and so is not what it should be. I have no quarrel with your proposed boundaries anywhere else, but the wilderness should really include Four Mile Bench. Here once again I see a conspicuous and tortured effort to eliminate, as far as possible, non-Federal sections from within the wilderness boundary. As I explained in my comments on area 20 (Canaan Mountain), this is not necessary and could cause management problems later on, especially should the proposed State of Utah - BLM land transfer actually take place. [Robert Hassell]

**26.2 RESPONSE:** It is Department of the Interior policy to generate wilderness suitability recommendations in a manner designed to minimize the potential need for acquisition of non-Federal surface and subsurface interests (USDI, BLM, 1986). The Proposed Action for some WSAs in the Final EIS omits certain State sections in accordance with Departmental policy. For Wahweap, the Proposed Action for the Final EIS has been changed to the No Action/No Wilderness Alternative; consequently consideration of State land in-holdings would not be involved. Also see the response to General Comment 6.4.

**26.3 COMMENT:** Interestingly, BLM, in its proposed alternative, has failed to include the Burning Hills and Death Ridge WSAs. These areas also include portions of the Kaiparowits Plateau coal deposits. These areas are bracketed by the Wahweap WSA to the west and by the Fifty Mile Mountain WSA to the east. If both the Wahweap and the Fifty Mile Mountain WSAs are designated as wilderness, the likelihood of developing the 2,528 billion tons of coal located within the Burning Hills and Death Ridge WSAs will be significantly reduced. The buffer policy of protection for the Wahweap and Fifty Mile Mountain areas will severely limit the development potential for both Burning Hills and Death Ridge. Any activities within the Burning Hills and Death Ridge areas will likely be regulated to such an extent as to make them de facto wilderness areas. [Utah Mining Association]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 26: WAHWEAP WSA (CONTINUED)**

**26.3 RESPONSE:** There is no "buffer policy," as explained in the response to General Comment 7.1. BLM believes that coal mining by underground methods (as projected in the long-term future for the Kaiparowits Plateau WSAs including Burning Hills and Death Ridge) could occur in the future without adverse effects to the Wahweap WSA. In the Final EIS the Wahweap WSA is not included in the Proposed Action, but not because of potential influence from coal resources in adjacent areas.

**26.4 COMMENT:** I am a livestock permittee with a grazing permit written on the Wahweap WSA. The writeup and map of the area contains at least one vital error. A major access into the area has been to drive down the Wahweap Creek bottom. My family and others have used that access to our grazing allotment and a State section which we have leased since 1948. I understand that my access to the area may be written into the plan for the area, but the study reports should be corrected to show the road. [Paul Partridge]

**26.4 RESPONSE:** The wilderness inventory identified the route down the Wahweap Creek bottom as a "way." It does not meet the definition of a road, although it has been used for vehicle access. Use of vehicles in connection with valid existing rights would be allowed following wilderness designation.

**26.5 COMMENT:** The eight State sections total 5,191.6 acres. The No Action/No Wilderness Alternative (Pages 1 and 16) correctly mentions State inholding acreage of 3840 acres (approximately). [State of Utah]

**26.5 RESPONSE:** Information of in-held and adjacent State sections has been reviewed and revised. The entire approach to State sections has been redone due to the changed position of the State of Utah. See the response to General Comment 6.3.

**26.6 COMMENT:** The Kaiparowits Plateau is a spectacular region, its value as wilderness far outweighs its possible value as for coal production or increased livestock grazing. People have lived on this planet for millions of years without mining the coal in this region and certainly can find a way to do without it. It is not worth permanently destroying this extremely unique corner of the world for a couple days' supply of coal. Why plan to increase grazing? The population of this country is barely growing, and per capita beef consumption has been declining -- certainly BLM can

manage to meet a diminishing demand for beef without further destructive developments for grazing such as chaining, reservoirs, and pipelines. The Wahweap Canyon Complex is the deepest and longest canyon system in the Kaiparowits Plateau and must be protected in its entirety. [Amy Lauterbach]

**26.6 RESPONSE:** Wilderness values, potential for future coal mining, and livestock grazing are addressed in the EIS. All are important multiple use considerations.

**26.7 COMMENT:** My main disagreement concerns the opportunity for solitude, which I found to be high. In my forays into this area I never encountered anyone else, and the intrusions of the "sounds of man" were nonexistent. Agreed, there is not much visual screening out on the benches so extensive development in the adjacent lands would certainly intrude on the quality of the wilderness. However, the possibilities of such development are speculative at best and should not be a major factor in influencing the decision for or against wilderness. [Robert Hassell]

**26.7 RESPONSE:** The rationale for the Proposed Action reflects, in part, the lack of visual screening on the benches. The Proposed Action for no wilderness in the Wahweap WSA is based on overall low wilderness qualities and the long-term future potential for mineral/energy extraction.

**26.8 COMMENT:** The recommended Partial Wilderness Alternative does not include the Four Mile Bench area which has the Four Mile Bench Old Tree Area, a unique area of extremely old (1,400 years) pinyon and juniper. This was the planned area of the Kaiparowits powerplant and is seemingly the only reason it was omitted from consideration. Absurd statements concerning no outstanding opportunities for primitive or unconfined recreation (Table 1) on Four Mile Bench was used as an excuse. The area is densely forested and has excellent opportunities for camping, hiking, and solitude, particularly in the adjacent and spectacularly beautiful Weese and John Henry Canyons that were not included in the proposed wilderness area.

No scientific values were reported but should now include important fossil sites found in the Reynolds Point, Ship Mountain Point, and Nipple Bench areas. Large areas were not recommended for wilderness due to five potential coal transportation corridors and the Kane County Master Plan (Table 1). The loss of 48 percent of the area's natural qualities

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 26: WAHWEAP WSA (CONTINUED)

is horrifying and significant. The intrusion of ATVs would probably further impact the area, particularly if coal development occurred.

The claim is made that only 10 percent of the WSA meets outstanding solitude criteria. Jack Riggs Bench, Four Mile Bench, and Horse Flat are not considered to have opportunities for solitude "due to lack of adequate screening." If screening is essential, no desert or ocean could be considered to provide solitude. Furthermore, the vegetation is quite dense in many of these areas, particularly on Four Mile Bench, and I can assure you solitude can be very easily achieved in the areas (I have hiked all of them). The All Wilderness Alternative would be more appropriate for the Wahweap WSA. [Robert Hassell]

**26.8 RESPONSE:** See the response to Specific Comment 26.6. The items noted in the comment are addressed in the EIS and have been considered in determining the Proposed Action. Although individual opinions may vary concerning the attributes of the Wahweap WSA, BLM believes that, in general, the WSA lacks outstanding wilderness characteristics and is not suitable for wilderness designation.

**26.9 COMMENT:** The Wahweap WSA is a fine example of Colorado Plateau scenery and geology. This WSA contains the longest and deepest canyon system in the Kaiparowits Plateau and deserves wilderness designation and protection based on its scenic merits alone. This WSA includes many other worthy attributes however. The Four Mile Bench Old Tree Area contains juniper and pinyon pines up to 1,400 years old and is an important area for scientific study. The WSA abounds in opportunities for solitude and recreation. Wahweap is an increasingly popular destination for backpackers and horseback riders. The partial alternative favored by the Draft EIS deletes the entire north end of the WSA including Drip Tank, Weeses Canyon, John Henry Canyon, and the entire Four Mile Bench Old Trees Area. I am appalled that this area is not being considered for wilderness protection.

Why is this area being dropped from further consideration? There are two potential conflicts outlined in the Draft EIS: livestock grazing "improvements" and coal development. As a taxpayer, I am disgusted with the continual welfare spending for wealthy ranchers on the public lands. The demand for beef in this country has been dropping for the last 20 years and yet the taxpayer always has to foot the bill for expensive and environmentally harmful range "improve-

ments" on sub-marginal grazing lands. Ranchers themselves pay a ludicrously low grazing fee that comes nowhere near paying the costs that your bureau incurs while servicing them. These fees are so ridiculously inadequate that many ranchers earn a good income merely by subleasing their grazing tracts to other ranchers for substantially higher prices. I refuse to stand still while a pristine wilderness area, and many others just like it, are sacrificed in order to subsidize an uneconomic activity. Cattle grazing will continue to be allowed in this area even if it is designated as wilderness. I think that is more than fair and as much as the livestock operators need. Coal development is a different matter entirely. The question here is not whether it will be profitable in the short term but whether it will be worth it in the long run. The position of the coal-bearing stratum in this WSA makes strip mining mandatory. The area is extremely sensitive environmentally and very arid and would probably never recover from such an assault. This area is first class, indeed world class wilderness. I believe that wilderness is a precious and valuable commodity in which demand will soon outstrip supply. There is no question in my mind that this area is worth more, economically and aesthetically, as wilderness. I strongly urge you to revise your recommendations for this lovely area. I hope to see a wilderness recommendation in the Final EIS that will include all of the Wahweap Wilderness Study Area. [Scott Delong]

**26.9 RESPONSE:** See response to Specific Comment 26.6. The rationale for the Proposed Action is not based on conflicts with livestock grazing; wilderness would preclude chainings but it would not preclude existing levels of grazing use. It is also important to recognize that all coal development on the Kaiparowits Plateau, including the Wahweap WSA, would be by underground mining methods. No surface minable coal exists on the Kaiparowits Plateau.

**26.10 COMMENT:** BLM claims that future transportation corridors pose conflicts with wilderness designation. In many cases large areas are deleted to accommodate such corridors. BLM provides no maps describing the location of the proposed corridors for any of the wilderness study areas involved. In the case of Mud Springs BLM claims a "future rail or coal slurry pipeline" would cross the area. BLM stated that the "Kaiparowits Coal Development and Transportation; Study for Southern Utah" describes the proposal. The consultant who prepared this document offers only general conceptual ideas which describe

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 26: WAHWEAP WSA (CONTINUED)

broad areas where corridors may be proposed. The conceptual corridors are up to 15 miles wide and six alternate routes are described. BLM uses this as the sole justification for deleting large parts or all of wilderness study areas from wilderness study. There are several problems with what BLM is proposing. The first is giving a consultant's report the status and weight of a land use plan. The report has not gone through the planning process nor had an EIS prepared on it. It has not complied with BLM's procedures for the designation and management of rights-of-ways. The public has had no opportunity for participation. For these reasons, this document cannot be considered a land use planning document and should be subject to general comments from the public. A utility corridor 15 miles wide is an absurdity. It represents nothing more than the effort by interested parties to keep every option open; that is understandable. What is difficult to understand is BLM's use of such a "wish list" as a serious proposal sufficient to disqualify an area for wilderness. BLM has demonstrated no need for these corridors. There has been no justification for any--much less all--of these provided to the public. BLM's decision to use the corridors as real conflicts is arbitrary. It is not supported by BLM's planning process. BLM falsely states the potential for corridor designation and the amount of land the corridor would occupy. BLM should apply each of the required criteria when considering transportation corridors (43 CFR 2806.1) in the wilderness study. We ask that BLM describe how the criteria have been used as well as which have not been used.

A majority of the corridors proposed could be served with existing rights-of-ways. BLM fails to describe the current rights-of-way their present use, their capacity and the feasibility of using them for additional facilities. Common sense requires such an evaluation. We recommend that BLM drop transportation corridors as a wilderness conflict in the EIS unless the analysis described above is performed.

To be fair, BLM must give equal weight to wilderness values and to proposals for commercial uses. Apparently pre-existing development proposals were given precedence. [Utah Wilderness Coalition]

**26.10 RESPONSE:** The National Environmental Policy Act and BLM Wilderness Study Policy require that the Proposed Action and alternatives be analyzed in relation to other resource values and uses. This includes the consideration of existing and future activities in energy resources, minerals, and rights-of-

way. The comment is correct in that the "Kaiparowits Coal Development and Transportation Study" was not done as part of BLM's regular land use planning (i.e., MFP or RMP). However, it is a valid conceptual planning study and it is properly considered in the State-wide Wilderness EIS. It provides basic information on potential transportation corridor alternatives. The study was an interagency regional planning document, jointly funded by the State of Utah, BLM, and National Park Service, and prepared by a consultant. Public meetings were held in Utah and Arizona and public input was encouraged.

A major objective of the study is to identify where it would be possible to construct and operate future railroad or slurry pipeline systems within engineering and environmental constraints. Corridors of 2 to 15 miles in width were identified and analyzed to allow for detailed adjustments in future location of more specific routes. Truck haul routes also were included in the study. See the responses to Specific Comment 25.24 and General Comments 8.18 and 23.2.

**26.11 COMMENT:** This entire WSA is truly the heart of the Kaiparowits Plateau area. Numerous ungrazed mesas are located here. Unique 1,400-year old junipers are present in this WSA. This biological treasure can best be protected through wilderness protection. BLM should include the Four Mile Bench Old Tree Area in its proposals. This WSA has the longest and deepest canyon system in the Kaiparowits Plateau and should be completely protected. [Sierra Club, Cache Group]

**26.11 RESPONSE:** Information on the old juniper area and on the canyon system is included in the EIS.

**26.12 COMMENT:** With regard to weighing the myriad of resource values, including wilderness, BLM has an apparent bias against natural and recreation values. This bias favors even speculative and theoretical potential for locatable minerals or fossil fuels. While not explicitly stated, mineral and energy potential preempted the All Wilderness Alternative in this case. Even though the recognized potential is considered low and that the quality of any mineral or energy resource is likely to be poor, the agency's compulsion to stand with mineral interests shows through. The portion of the WSA that BLM views as potentially suitable for minerals/energy development is also curiously lacking in wilderness values even though it represents a clear extension of adjacent lands that

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 26: WAHWEAP WSA (CONTINUED)

"qualify" for wilderness according to the agency. [Utah Wilderness Association]

**26.12 RESPONSE:** Although mineral resources and other factors have been considered, the primary rationale for the proposed No Action/No Wilderness Alternative is the overall lack of outstanding wilderness values.

**26.13 COMMENT:** Wahweap WSA is considered to have moderate wilderness values and conflicts compared with other WSAs in this part of the region. BLM's proposed 70,380-acre Partial Wilderness Alternative would eliminate or significantly reduce the negative impacts of conflicts. A boundary adjustment excluding all mesa tops would further minimize livestock conflicts. Exclusion of the upper reaches of Four Mile Canyon would mitigate much of the remaining conflict with 50 million tons of Straight Cliffs coal formation. The Four Mile Bench area, deleted in the partial alternatives and which contains 1,400-year-old juniper trees, could be considered for a Research Natural Area designation to protect the scientific values present. An improved highway between US-89 and Cannonville will be needed in the future. The bottom of Cottonwood Creek must be reserved for this alignment. [State of Utah]

**26.13 RESPONSE:** See response to Specific Comment 26.12.

**26.14 COMMENT:** It appears that BLM dropped this area because of coal potential even though BLM says that this is highly unlikely. [Sierra Club, Cache Group]

**26.14 RESPONSE:** See the response to Specific Comment 26.12.

**26.15 COMMENT:** The Wahweap WSA is particularly rich in supplemental natural values. Exposed geology in the area represents a rich opportunity for both scientific study and recreational geologic sightseeing. Exposures of several of the formations in the unit also provide habitat for several rare and endemic plant species. These include Penstemon atwoodii, Psoralea pariensis, Psoralea epipsila, Xylorhiza cronquistii, Cymopterus higginsii, and Coryphantha missouriensis var. marstonii. The botanical uniqueness of the area and the habitats that support these rare plant species have seen little study. Scientific understanding of these and related species may help trace evolutionary connections. In addition, these plants are

of interest to a growing number of interested amateur botanists who seek them out. [Utah Wilderness Association]

**26.15 RESPONSE:** See the response to General Comment 13.1. The vegetation section has been re-examined and updated for the Final EIS.

**26.16 COMMENT:** The old junipers at Four Mile Bench should be protected for their scientific, natural diversity, and esthetic values. Also protection of the section called the Gut would provide for a continuous, outstanding, undeveloped natural area from Grosvenor Arch all along the Cockscomb, which is one of the most unique landforms in this amazing southern Utah landscape. [Jean Soko]

**26.16 RESPONSE:** The old junipers are noted as a "special feature" for this WSA in the Wilderness Values portion of the EIS. No surface disturbance is projected in this area as the old junipers at Four Mile Bench have been excluded from any development activities by the BLM land use plan. The entire section of the Cockscomb in the Wahweap WSA is considered to be a scenic "special feature." The Cockscomb extends from northern Arizona to the Canaan Peak area of the Dixie National Forest. The southern portion is located in the designated Paria Canyon/Vermillion Cliffs Wilderness.

**26.17 COMMENT:** Explain specifically where each vegetation type exists in the WSA. [Kim Jennyson]

**26.17 RESPONSE:** The narrative specifically indicates the location of the riparian vegetation. The locations of the pinyon-juniper woodland, shadscale, and sagebrush types are somewhat intermixed and are not significant to the EIS analysis. About 75 percent of the WSA is the pinyon-juniper woodland type.

**26.18 COMMENT:** If the old tree area is not included in the designated wilderness, old trees of great scientific value will be subject to harvest and vandalism. As stated in the EIS, the remaining 64,020 (non-wilderness) acres would be open to woodland harvest. [John Cady]

**26.18 RESPONSE:** Protection for further scientific study has been considered for the old tree area. This can be done with wilderness designation or as a separate action in an amendment to BLM land use plan. BLM will review the area to determine if a special management designation (i.e., ACEC) is warranted for

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 26: WAHWEAP WSA (CONTINUED)**

the old tree area. See the response to Specific Comment 26.16.

**26.19 COMMENT:** The geology discussion is well done. [State of Utah]

**26.19 RESPONSE:** The comment is noted.

**26.20 COMMENT:** The low rating for locatable minerals seems reasonable. [State of Utah]

**26.20 RESPONSE:** All of the minerals information has been reviewed and updated. The rating for locatable minerals continues to be low.

**26.21 COMMENT:** The assumption is made that locatable minerals are evenly distributed in the WSA. This is a poor assumption since locatable minerals are generally not evenly distributed. [State of Utah]

**26.21 RESPONSE:** This assumption was used in the Draft EIS in order to estimate the results with the partial alternatives. The assumptions have been revised for the Final EIS to more precisely forecast the most likely locations for mineral development in the short term, with more general information for the long term.

**26.22 COMMENT:** The overall potential for energy mineral development, the large number of issued coal leases, and a resource estimate of approximately 1 billion tons of coal support an OIR of 3 or possibly higher. [State of Utah]

**26.22 RESPONSE:** The Overall Importance Rating (OIR) is not used in the Final EIS.

**26.23 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration. Wahweap WSA includes up to 500 MMT or more of recoverable coal. It is in probably the largest single undeveloped coal region in the United States. The coal loss would be very significant if this area becomes wilderness. Access to the coal and mining of it must not be prohibited, and it should be given very high priority for coal development. [Utah International, Inc.]

**26.23 RESPONSE:** The coal resource and development potential is described in the EIS.

**26.24 COMMENT:** AMCA is the record assignee of 40,277 acres of Federal coal leases and 6,210 acres of Utah State coal leases in the Kaiparowits coal fields, an important part of which lies within the Wahweap and Burning Hills WSAs and all of which is adversely affected by potential transportation problems resulting from the adjoining Mud Spring Canyon and Death Ridge WSAs. BLM studies and final recommendations eliminate all of these WSAs from their preferred alternative shown on Pocket Map 4, "Paramount Wilderness Quality Alternative." The coal measures underlying these WSAs contain the largest reserve of quality coal in the western U.S. which has remained undeveloped because of lack of transportation. In 1960 an active exploration program in preparation for a mine-mouth powerplant began. This work demonstrated over 400,000,000 tons of coal, fully explored and ready for mining. The mine-mouth powerplant project died after a long controversy over the impact of a second plant in the Glen Canyon area. Locking up these reserves in a wilderness area would deprive the southwest States of a major energy base sufficient to serve the needs of power generation and gas liquid fuel conversion for generations to come. We urge BLM to withdraw Wahweap, Burning Hills, Mud Springs and Death Ridge WSAs from further consideration. They contain known reserves on which many millions of dollars have been spent in exploration, mine planning, permitting, and water acquisition. [AMCA]

**26.24 RESPONSE:** Available data on the coal resource and projections of market conditions suggest that the Kaiparowits coal field will not afford competitive, commercial production in the short term (within about the next 20 to 30 years). Beyond that time, the potential exists for future coal extraction in commercial quantities. This is an assumption made for several of the Kaiparowits WSAs, including the Wahweap WSA, in the Final EIS. Also see Appendix 6 in Volume I.

**26.25 COMMENT:** The Resources Company drilled 202 holes on the leasehold. Information includes plats showing structural contours and isopachs of various seams, cover lines, and all data needed for mine layout and planning. The work was incorporated into an application to mine filed with the then USGS Minerals Conservation Branch which is now the Minerals Management Division of BLM and the Utah Division of Oil,

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 26: WAHWEAP WSA (CONTINUED)

Gas and Mining. The application consisting of many volumes is in the files of those agencies and available for inspection. If these WSAs are not eliminated from the EIS, mining from this field will be precluded, this tremendous resource will be lost, and last but certainly not least, the \$25 million spent on exploration, planning, and development will have been wasted. This scenario would be tragic. [AMCA]

**26.25 RESPONSE:** The information referenced in the comment has been reviewed and generally is reflected in the EIS, along with other data. The presence of the coal resource is well documented; however, the timing of commercial extraction and marketing is in question. See the response to Specific Comment 26.24.

**26.26 COMMENT:** BLM's proposed alternative includes designation of the majority of the Wahweap and Fifty Mile Mountain WSAs as wilderness. Both of these WSAs contain coal deposits on or adjacent to the Kaiparowits Plateau. By BLM's own figures, the inclusion of these WSAs would prohibit the extraction of approximately 1,147,000,000 tons of coal. Both of these areas received "f4" and "c4" ratings under BLM's overall importance rating system. To support its contention that this coal resource should remain undeveloped, BLM suggests that development of the resource will create significant economic and environmental difficulties. The majority of these economic and environmental difficulties are the direct result of BLM's current management of practically the entire Kaiparowits Plateau as a WSA. Valuation of these deposits should be based upon the willingness of the lessees of the 25 current coal leases within these WSAs to continue to make rental payments. Valuation should not be diminished by artificial BLM-created obstacles. [Utah Mining Association]

**26.26 RESPONSE:** It is not BLM's "contention that this coal resource should remain undeveloped . . ." The lack of development is due to market, transportation, and other factors not related to BLM management activities. Even if the WSAs were not subject to the current wilderness Interim Management Policy (IMP), such current external conditions would preclude commercial development of Kaiparowits coal. In the long term, BLM expects that coal development may occur at one or more locations in the Kaiparowits region. See responses to Specific Comments 26.24 and 26.25 and Appendix 6 in Volume I of the Final EIS.

**26.27 COMMENT:** The Alton coal field illustrates many of the problems inherent in developing southern Utah coal. Part of this field was designated unsuitable for strip mining by the U.S. Office of Surface Mining, owing to severe environmental constraints, including adverse impacts on visual resources, hydrologic impacts, and difficult revegetation. The latter problem is significant; Federal law prohibits surface coal mining in areas where native vegetation communities cannot be reestablished and maintained. Throughout southern Utah, but particularly in the severe climates and thin soils of wildland areas, revegetation may well be a fantasy. [Utah Wilderness Coalition]

**26.27 RESPONSE:** Much of the Alton coal field was proposed for strip mining whereas the Kaiparowits coal would require underground mining. The difference in methods would have substantial differences in visual, hydrologic, and revegetation impacts. Underground mining impacts would be substantially less than for strip mining. This is reflected in the assumptions and analysis for the No Action/No Wilderness Alternative. None of the coal in the WSA has been determined to be unsuitable for mining as a result of the application of the coal unsuitability criteria (43 CFR 3461).

**26.28 COMMENT:** In the Draft Environmental Impact Statement, the statement is made that the coal reserves contained in the Burning Hills and the Wahweap WSAs amounts to 92 million tons. These are not theoretical computerized reserves, these are based on actual mining plans which are on file in the mineral management branch of BLM and also the State Board of Oil, Gas and Mining. I believe it would be appropriate for BLM to re-examine the SAI appraisals of the resources within those two WSAs. [James Quigley]

**26.28 RESPONSE:** See the response to General Comment 15.1. The combined in-place coal resource for the Burning Hills and Wahweap WSAs is estimated at 1.928 billion tons.

**26.29 COMMENT:** We agree with the conclusion that oil and gas resources in WSAs will be essentially foregone under the so-called "preferred alternative." Specifically, our company concludes that inclusion of the following WSAs would adversely affect potential hydrocarbon exploration and development: Canaan Mountain, Parunuweap Canyon, Moquith Mountain, Paria-Hackberry, Wahweap, Burning Hills, and Fifty Mile Mountain.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 26: WAHWEAP WSA (CONTINUED)**

Enclosed is a geologic overview and critique of the Greater Kaiparowitz Basin in Southern Utah. This report was prepared by Daniel D. Tisoncik, Senior Staff Geologist, Champlin Petroleum Company. His report cites the 21 million barrel Upper Valley field in Garfield County. [Champlin Petroleum Company]

**26.29 RESPONSE:** The report cited has been reviewed, included in the minerals data base, and reflected in the analysis.

**26.30 COMMENT:** Transportation to the markets in the southwest can be accomplished by truck to rail sites and thence to market. The truck haul is somewhat longer than the 85-mile haul to the railroad presently made in Central Utah from Salina Canyon to Levan. Although this seems potentially a large cost, this truck haul serves to reduce the rail haul to the Southwest by 200 miles and equates to a cost saving, not an extra expense. Costs per ton mile for rail vs trucks over short hauls have been narrowing for years. When this trend will level off cannot be predicted. However, under present costs coal can be moved from Kaiparowits to southwestern markets at costs comparable with coal from Central Utah. [AMCA]

**26.30 RESPONSE:** Truck haul was evaluated in the "Kaiparowits Coal Development and Transportation Study." That document indicates that truck haul would serve a low level of commercial coal development, up to about 5 million tons per year. Rail or slurry pipeline would be required for production above that level. The report indicates that truck haul would need to come from several dispersed locations, with up to 2 million tons at Alton, 1 million tons at North Kaiparowits, and 2 million tons at South Kaiparowits. In order to obtain this, a new haul road would be needed from the South Kaiparowits Plateau (ERT, 1980).

**26.31 COMMENT:** The coal reserves in the Central Utah coal fields are largely either mined out, or committed on a long-term basis. Therefore, any significant new growth will require a new source of coal for fuel. Coal from large strip reserves in eastern Wyoming is not practical to users in the far west because of long rail hauls and low Btu value of that field. The Kaiparowits field is uniquely suited to fill this need. [AMCA]

**26.31 RESPONSE:** The Central Utah coal fields are not mined out or fully committed. Utah's coal production currently is about 12.9 million tons per year; current existing production capacity is 20 million

tons per year; designed capacity in existing and planned mines is 32 million tons per year and projected Utah production or demand in 1995 is 20 million tons per year. The maximum projected Utah production by the year 2005 is anticipated to be in the range of 30 million tons per year (BXG Inc., 1985). This means that Utah has considerably more production capacity than currently utilized and/or needed in the foreseeable future. At some long-term point in the future, the Kaiparowits coal could be a source for the far west users, but not in the short term. See response to Specific Comment 26.24.

**26.32 COMMENT:** Exxon believes each of these areas contain geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work and perhaps, exploratory drilling to determine if such deposits do exist, and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geologic data which led us to this recommendation. [Exxon Corporation]

**26.32 RESPONSE:** Information presented by the various energy and mineral companies has been reviewed, considered, and generally reflected in the EIS information.

**26.33 COMMENT:** Mineral development would, in all probability, cause greater surface disturbance than the 330 acres suggested. [State of Utah]

**26.33 RESPONSE:** The analysis assumptions have been re-evaluated for the Final EIS. For the Wahweap WSA, it is assumed that no leasable or locatable mineral exploration and development would occur in the short term (prior to the year 2020). In the long term, it is assumed that underground mining for coal would occur, however, the extent of long-term surface disturbance has not been determined in the Final EIS. The nature of the long-term coal development is further described in the assumed Action Scenario for the Wahweap WSA No Action/No Wilderness Alternative.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 26: WAHWEAP WSA (CONTINUED)**

**26.34 COMMENT:** The discovery (exploration) phase of a 1,500-ton U<sub>3</sub>O<sub>8</sub> ore body would probably require surface disturbance well in excess of the 250-acre extent indicated. The 250-acre figure could represent the disturbed acreage during the actual production stage. In reality, present and near-term postulated economics will require grades greater than 0.01 percent U<sub>3</sub>O<sub>8</sub>, reducing the size of potential ore bodies while increasing the amount of area disturbed during discovery. [State of Utah]

**26.34 RESPONSE:** In the Final EIS, uranium exploration and development is not expected to occur in the Wahweap WSA.

**26.35 COMMENT:** The agency's bias toward speculative mineral potential is typified in the discussion of titanium. BLM implies that because deposits of titanium bearing sandstones occur elsewhere in the region and that similarly aged sandstones occur in the WSA that titanium could be viable developable mineral value. This of course is shallow analysis, even with the use of the f2 favorability rating and the c1 certainty rating. To make such premature determinations in favor or against consideration of the WSA for wilderness designation is unfounded. The portion of the WSA BLM finds unsuitable at this juncture should clearly be carried forward in the process to allow the full minerals and energy studies due in the next phase of wilderness study. [Utah Wilderness Association]

**26.35 RESPONSE:** In the Final EIS, titanium exploration and development is not projected to occur in the Wahweap WSA.

**26.36 COMMENT:** BLM states very clearly that coal development is unlikely in the Kaiparowits Plateau. Many citizens fought the last proposed coal-fired electric plant for this area. That alone should preclude any other potential development. [Sierra Club, Cache Group]

**26.36 RESPONSE:** The wilderness study is based on current information and current public involvement. It is not necessarily related to issues and public input which occurred in the early 1970s as part of the Kaiparowits powerplant studies.

**26.37 COMMENT:** Oil, gas, and coal are the predominant minerals identified in this WSA. Coal resources are rated f4 for favorability and certainty. The Kaiparowits Power Project was once planned to use the estimated 900 million to 1 billion tons of recoverable

coal contained in Wahweap. Only about 10 percent of the Wahweap WSA qualifies as wilderness, and its highest and best use must remain as mineral development property. Designation of Wahweap as a wilderness area could create a barrier to UP&L's transportation route from its coal lease properties in the KRCRA. As a utility certificated and franchised to serve in the State of Utah, UP&L must meet its responsibility of planning and building for the public's future electrical needs. Economically, it is more advantageous to build a mine-mouth generating plant, as located in Emery County. However, in order to develop the coal in its Kaiparowits coal field lease, it may be necessary to transport the coal to a less environmentally sensitive area to generate electricity. UP&L has worked with railroad engineers to develop a viable and feasible transportation route, avoiding serious impact on the WSAs included in BLM's Proposed Action alternative. The proposed railroad routes from the Kaiparowits coal field mines to be developed by UP&L would cross and substantially impact WSAs 27 (Burning Hills) and 28 (Death Ridge), as well as cross the southern tip of WSA 26 (Wahweap) and adjoin the western boundary of WSA 25 (The Cockscomb). A map of UP&L proposed rail route is included with these comments. [Utah Power and Light]

**26.37 RESPONSE:** See responses to Specific Comments 26.10, 26.24, 26.25, and 26.26. The UP&L proposed rail route is within the corridors contained in the report mentioned in the response to Specific Comment 26.10. BLM has not received right-of-way applications or any other indication of when UP&L may want to construct its proposed rail line.

**26.38 COMMENT:** The phrase "one-third to one-half of the coal is recoverable" is frequently used for WSAs with coal resources without specifying that this assumes a room and pillar mining method; long-wall mining would obviously produce much higher yields. [State of Utah]

**26.38 RESPONSE:** The reference of in-place coal resources being one-third to one-half recoverable is a very general statement used for potential underground minable coal when minimal information is not available on the coal deposit. This is a general figure for planning purposes without consideration for the type of underground mining method. As more information is gathered on a deposit, more specific planning as to the type of mining method and more accurate projection of the recovery percentage is possible. It is true long-wall mining will get a higher recovery,



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 26: WAHWEAP WSA (CONTINUED)**

but due to the significant investment required, technical and economic conditions must be right to justify the investment.

**26.39 COMMENT:** Inventory the wildlife and determine which species exist in the WSA and list them. [Kim Jennyson]

**26.39 RESPONSE:** The EIS is based on the best information available and has been focused on the significant issues. It is not the purpose of the EIS to be an encyclopedia or a detailed reference to document everything found in the WSA. Wildlife are not among the major criteria for wilderness evaluation but in some areas are noted as "special features". The text has been revised to some wildlife species that may be found in the Wahweap WSA as special features. Also see the response to General Comment 16.1.

**26.40 COMMENT:** The wildlife section should be expanded. [State of Utah]

a. The area has potential to attract desert bighorn sheep from adjacent habitat. Chukar and Gambel quail have been stocked in the WSA.

b. Desert bighorn sheep frequent the area. Mule deer are yearlong residents, not winter visitors only. There is a current proposal to stock bighorn sheep into an area of the Glen Canyon Recreation Area, just south of the Wahweap WSA. These sheep could move into the Burning Hills WSA.

**26.40 RESPONSE:** BLM has re-examined and updated the Wildlife section of the WSA.

**26.41 COMMENT:** The impacts of alternatives on riparian habitat, which Volume I describes as "unique and limited high-value wildlife habitat," are not described. It is asserted that the All Wilderness Alternative would have a negative impact on wildlife because water is limiting for wildlife and wildlife would be negatively impacted by the prevention of 1,000 acres of land treatments. This assertion does not consider wildlife in the broad sense. [Scott Mills]

**26.41 RESPONSE:** The EIS identifies that riparian habitat is present along segments of four streams: Wahweap Creek, Tommy Smith Creek, Four Mile Canyon, and Long Canyon. The surface disturbance projected for the WSA would not affect the riparian areas. For example, the vegetation treatments would

occur on bench areas away from the riparian vegetation.

**26.42 COMMENT:** This WSA is a prime example of the Cedar City District's creative abilities at downgrading wilderness and scenic values in order to make sure that nothing is allowed to interfere with the mining and chaining projects that the District is promoting. For example, some of the Class A Scenic Quality area has a VRM classification lower than Class II. Almost all of the Class B Scenic Quality area has a Class IV VRM rating. [Owen Severance]

**26.42 RESPONSE:** Visual resource inventory classes are assigned based on combinations of scenic quality, sensitivity levels, and distance zones. BLM Manual Handbook 8410-1 (Visual Resource Inventory) shows in illustration 11 that it is possible to have a visual resource inventory Class II with Class A Scenic Quality and a Class IV area which contains Class B Scenic Quality. See the response to General Comment 16.1.

**26.43 COMMENT:** Scenic values areas should also be identified as special features on a map to aid the reader in determining whether they are included in the partial alternative. [State of Utah]

**26.43 RESPONSE:** The narrative identifies the locations by name where scenic values are special features. These locations are named on the partial alternative map (Map 3), and there is no need for a separate map.

**26.44 COMMENT:** Do an archaeological inventory. [Kim Jennyson]

**26.44 RESPONSE:** The National Environmental Policy Act and the Wilderness Study Policy do not require special cultural resource inventories for EIS preparation. The best information available has been used. See the responses to General Comments 20.2 and 22.1.

**26.45 COMMENT:** The document contains a good statement on cultural resource values. [State of Utah]

**26.45 RESPONSE:** The observation is noted.

**26.46 COMMENT:** If no reliable data on existing recreation use is available, how was it determined that 100 visitors days occur annually? Explain how

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 26: WAHWEAP WSA (CONTINUED)

75 percent primitive activities and 25 percent recreational activities was determined. [Kim Jennyson]

**26.46 RESPONSE:** The estimates of existing visitor use and the types of use for the Wahweap WSA are based on the observations and knowledge of BLM field personnel. See the response to General Comment 21.5.

**26.47 COMMENT:** The statement is made that no outstanding opportunities for primitive recreation exist in the WSA, but public comments contradict this statement. [State of Utah]

**26.47 RESPONSE:** The evaluation of primitive recreation opportunities is based on the professional judgment of BLM recreation specialists and field personnel. It is not uncommon for differences of opinion to exist in such subjective determinations. See the response to General Comment 22.3.

**26.48 COMMENT:** BLM has inadequately described the potential impact of "all terrain vehicles" (ATVs). A few years ago I noted virtually no impact by off road vehicles, but even in areas where motorized vehicles have been restricted to existing roads (e.g., Coyote Creek area, Wahweap WSA) there is now abundant evidence of ATV activity. This is damaging both to wildlife and plant habitats and can only be adequately controlled by wilderness designation. These kinds of impacts would become very significant if access to the area was increased by coal development. [Robert Hassell]

**26.48 RESPONSE:** Impacts from vehicular activities are noted in the Final EIS. ORV activity in the Wahweap WSA is very low. Overall, impacts are not considered significant.

**26.49 COMMENT:** BLM states that the portion of land dropped for the partial proposal is due to coal and proposed vegetation treatment conflicts. Yet in the Mineral and Energy Resources section BLM states that due to problems of economic and environmental considerations this coal development is rated as low if even ever! Many times throughout the Draft EIS are such discrepancies noted. In the Naturalness section, it is stated that the imprint of man in this unit is less than 1 percent. The section of land that is proposed as wildlife habitat improvement makes no sense. The existing wildlife are fine in their natural habitat. Once that is disturbed, then so are the various animals. Because of the size of this area and the topography,

BLM admits that opportunities for solitude are outstanding. There again BLM states that only 10 percent of the area is under the outstanding solitude criterion. By looking at the topo map, this can not be the case. Much of this acreage is able to provide unconfined and primitive recreation, as well as outstanding solitude. [Damian Fagan]

**26.49 RESPONSE:** See the responses to Specific Comments 26.6, 26.7, 26.8, and 26.47. BLM does not believe that the opportunities for solitude are outstanding in the Wahweap WSA.

**26.50 COMMENT:** BLM's assessment of solitude is not accurate. [Michael Van Note, Owen Severance, and Kim Jennyson]

a. Though I agree with BLM that this unit is deserving of wilderness designation, I disagree with the comments concerning some wilderness values. Certainly more than 10 percent of the WSA offers outstanding opportunities for solitude. The very size of the unit itself is enough to offer the empty expanse needed for solitude of an extra ordinary nature. Numerous canyons offer isolation throughout over a third of the WSA. The pinyon-juniper vegetation contributes further to screening. On the open benches, solitude is emphasized not detracted from. This very openness, empty of the marks of man, barren looking and primordial, accents the solitude of the wilderness. It is more outstanding because of this open, soundless, emptiness where oneself may be the most obvious feature of the landscape. I would suggest that the opportunities for solitude here are as good if not better than in any of the nearby national parks, monuments, or recreation areas. Certainly an area with only 100 visitor use days annually offers outstanding solitude. It would seem at present nearly impossible to come into contact with another human being in this vast landscape since two-thirds of the year no one is even there by these estimates. The other third (100 days) would have to be shared with a "crowd" of one. It is simply ludicrous to suggest that WSAs such as this (as well as many others with such low visitor use days) offer anything but outstanding opportunities for solitude.

I must also disagree with the opinion that there are no outstanding opportunities for primitive and unconfined recreation. The area is well suited for both a variety of day hikes and backpacking trips up to 4 days or longer (in conjunction with other nearby roadless areas such as the Paria-Hackberry WSA though

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 26: WAHWEAP WSA (CONTINUED)

this would require crossing one road). There are good opportunities to observe interesting features of geology. Some of these, such as the Kaibab monocline, are unique to the Colorado Plateau, having been described in early monographs and reports on the geology of the region. Intertonguing, fluvial channels, and unconformities offer other items of geological interests, as well as being good areas to look for a variety of fossils including large vertebrates living at the peak of the "dinosaur ages." The unique land-forms offer good opportunities for photography or viewing the carved benches, pillars, and canyons. Rockclimbing and horseback riding are also available activities as are observed and study of features such as the "Old Trees Area" and several archaeological sites. I would consider such a variety of activities to be both outstanding in diversity and quality. The particularly pristine nature of the many coves and canyons make these opportunities even more outstanding. My only other comment on this WSA would be to say that including the upper reaches of the scenic Tommy Canyon, Pet Hollow, and the Cockscomb near the Gut would add cohesiveness to the proposed wilderness and further add opportunity for outstanding recreation such as sightseeing, etc.

b. The claim that only 10 percent of the WSA has outstanding opportunities for solitude is ludicrous. If 43,000 acres of the WSA have enough pinyon/juniper that BLM wants to chain it, then that 43,000 acres has outstanding solitude. In addition, since the WSA is 20 miles by 15 miles, the size of the WSA means that most of it has outstanding opportunities for solitude (solitude means isolation - the Draft EIS doesn't state what definition the Cedar City District used). I also disagree that there are no outstanding opportunities for primitive recreation. At a minimum there are opportunities for hiking, sightseeing, backpacking, horseback riding, and geologic sightseeing - so the number of activities available allows the area to meet the outstanding requirement. The Cedar City District's antiwilderness bias is obvious. Fortunately, Congress, not the Cedar City District, will be the final judge of wilderness values in this WSA.

c. About 73 percent or 98,112 acres consists of pinyon-juniper woodland; this provides enough screening to provide for outstanding opportunities for the landscape and the presence of deep canyons and the vastness of the extremely large WSA. Finding a secluded spot away from sight of others and their sounds is quite easy. Also as stated in Draft EIS Volume I, pg. 217, solitude is not defined by the amount

and the quality of vegetative or topographic screening which is present. Opportunities for outstanding primitive recreational activities exist throughout the WSA. Although loop hikes, destination hikes, and long hikes are not needed to fully experience wilderness, all of these are available in the Wahweap WSA. Destinations include scenic geologic spots such as Cads Crotch, Chimney Rock, Jack Riggs Bench, and Four Mile Bench (on which an ancient grove of pinyon and junipers is growing). Numerous routes are available for backpacking with good access from the Cottonwood road. The geologic diversity of hoodoos, balanced rocks, large coves with narrow canyons, and mesa tops offers outstanding recreational opportunities. Additional opportunities include: geologic observation, drawing, photography, and sightseeing.

**26.50 RESPONSE:** See responses to Specific Comments 24.42 and 26.49.

**26.51 COMMENT:** While acknowledging "naturalness" throughout the WSA, BLM goes on to eliminate 48 percent (64,020 acres) from consideration. No explicit justification is given for the smaller recommendation, however, the agency raises a perceived lack of "screening" in the area as not contributing to outstanding opportunities for solitude or primitive and unconfined recreation. This view of solitude fails to recognize the undulating terrain, trees and shrubs, or the abundance of open space as contributing elements in affording solitude. [Marvin Poulson]

Recognition of diverse elements and their cumulative contribution to solitude is utterly lacking in the agency approach to analysis. Each area is made up of unique wilderness qualities and not equitable to a stereotypic norm. To assume that the same elements are at work in the same measure, as contributing to solitude in each area ignores uniqueness and suggests that only a single area in all the world need be viewed as possessing the "ultimate" wilderness. Thank God the world we live in offers more diversity than that. With regard to weighing the myriad resource values, including wilderness, BLM has apparent bias against natural and recreation values. This bias favors even speculative and theoretical potential for locatable minerals or fossil fuels. While not explicitly stated, mineral and energy potential preempted the All Wilderness Alternative in this case. Even though the recognized potential is considered low and that the quality of any mineral or energy resource is likely to be poor, the agency's compulsion to stand with mineral interests shows through. The portion of the WSA that

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 26: WAHWEAP WSA (CONTINUED)

BLM views as potentially suitable for minerals/energy development is also curiously lacking in wilderness values even though it represents a clear extension of adjacent lands that have "quality" for wilderness according to the agency.

**26.51 RESPONSE:** See response to Specific Comment 26.49. BLM recognizes that subjective judgments on wilderness qualities, scenic values, and recreational interests may vary widely from one person to another. It is the legal responsibility of BLM to conduct the wilderness study and to provide recommendations to the Secretary, who will present recommendations to the President, who will transmit recommendations to the Congress. Since BLM has the legal mandate to conduct the study, it is BLM's views and professional judgments that are described in the EIS and used in the rationale for the Proposed Action. Public views are reflected, but since they often are conflicting, BLM resolution is needed and the BLM position is presented. It strives for a professional and objective approach, evaluating each WSA individually and on a broad basis. BLM's position often is a composite of the diverse views of various resource specialists and managers.

**26.52 COMMENT:** BLM should recognize scientific values including vegetation as special features. [Marvin Poulson, Robert Hassell, and Brian Wood]

a. The Wahweap WSA is partially rich in supplemental natural values. Exposed geology in the area represents a rich opportunity for both scientific study and recreational geologic sightseeing. Exposures of several of the formations in the unit also provide habitat for several rare and endemic plant species. These include Penstemon atwoodii, Psoralea pariensis, Psoralea epipsila, Xylorhiza cronquistii, Cymopterus higginsii, and Coryphantha missouriensis var. marstonii. The botanical uniqueness of the area and the habitats that support these rare plant species have seen little study. Scientific understanding of these and related species may help trace evolutionary connections. In addition, these plants are of interest to a growing number of interested amateur botanists who seek them out. BLM now recognizes the significance of the ancient pinyon pine trees on Four Mile Bench. Protection of these scientifically valuable trees would obviously be greatly enhanced by wilderness designation. It is puzzling, however, that BLM concludes that there are no educational values to be found in the WSA. With the geologic richness, the old growth pinyon pines, numerous micro-habitats and

plant ecosystems, clearly offer abundant educational values. The Wahweap WSA should be considered to possess particularly rewarding educational opportunities.

b. While I agree that, comparatively speaking, the scenic values of the area are not great, the area has other qualities which make it very suitable for wilderness. The old juniper forest on Four Mile Bench is very nearly one of a kind, and I believe that the best way to protect this resource is with a wilderness classification. The relatively small amount of space devoted to this resource in the EIS does not adequately describe the value of a true climax pinyon-juniper forest to science. In fact, the relatively undisturbed nature of this area makes it particularly valuable as a site for research in several fields.

c. There are scientific values present, but not educational values. Why can't scientific values also have educational values?

**26.52 RESPONSE:** Educational values are inherent in some of the special features described in the Special Features section of the Affected Environment.

**26.53 COMMENT:** There are two powerlines, a 69 kV and a 230 kV, and a road in Cottonwood Wash, which would be impacted by wilderness designation with Paria-Hackberry and Wahweap WSAs. The boundary, at least, must be pulled back to the high ground on each side of the Cottonwood Wash area so that maintenance and upgrading of these lines can be performed. There is also a communication site in the east portion of the Wahweap WSA. [Utah Power and Light]

**26.53 RESPONSE:** The powerlines and road are authorized by existing rights-of-way which would provide for maintenance and reasonable upgrading. Wilderness designation would have no effect on these facilities which border but are outside of the WSA. There is no communication site on public lands in the eastern portion of Wahweap WSA.

**26.54 COMMENT:** A minimum of 75 well paid jobs would be required for a start-up mine and the benefits on the surrounding communities would be substantial. The share of Federal royalty going to State institutions would be significant and as State leases were opened up, larger sums per ton of production would be available to education through the State Division of Lands and Forestry. We believe that State and local officials should speak for themselves, but without

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 26: WAHWEAP WSA (CONTINUED)**

question the well being of the region would be permanently damaged by the continued inclusion of Wahweap, Burning Hills, Death Ridge, and Mud Springs Canyon in the wilderness study program. [AMCA]

**26.54 RESPONSE:** As noted response to Specific Comment 26.24, mining is not anticipated in the WSA within the next 20 to 30 years, with the No Action/No Wilderness Alternative; therefore, no significant economic benefits to the local area or the State are expected from mining during this period. The potential for local economic change related to mining exists in the long term. Also, see the responses to General Comments 24.14 and 24.15.

**26.55 COMMENT:** The State receives 50 percent of the royalty from coal mined from Federal leases, and this money is distributed to various governmental, community, and educational bodies for public purposes. Locking up this income from coal would have a wide effect by crippling the State's ability to aid communities all over the State and impact the operating income of the Board of Regents, the Utah Department of Education, and the State's reclamation program. [AMCA]

**26.55 RESPONSE:** Wilderness designation in the Wahweap WSA would have no effect on royalty income for the next 20 to 30 years as noted in the response to Specific Comment 26.54.

**26.56 COMMENT:** Scoping response 27 denies badlands are present, but the EIS narrative states there are badlands. [Brian Wood]

**26.56 RESPONSE:** Response 27 in the Draft EIS was in error. It does not appear in the Final EIS. All scoping comments have been omitted because the public review comments (Volume VII) are more current.

**26.57 COMMENT:** The WSA boundary on Map 1 in the Pet Hollow area differs from that on Maps 2 and 3. [State of Utah]

**26.57 RESPONSE:** The maps have been redone and corrected for the Final EIS.

**26.58 COMMENT:** State in-holdings total 9,720.84 acres. Same comment applies to page 28, paragraph 3. [State of Utah]

**26.58 RESPONSE:** The Final EIS has been revised to show 16 sections of in-held State land (10,261 acres) which are located in the WSA.

**26.59 COMMENT:** Page 8, All Wilderness Alternative, Paragraph 1: Fifteen in-held and 13 adjacent sections would be exchanged. [State of Utah]

**26.59 RESPONSE:** The position of the State of Utah on exchanges has changed and exchanges are not anticipated in the Final EIS.

**26.60 COMMENT:** Page 18, Geology: The geologic discussion is well done. [State of Utah]

**26.60 RESPONSE:** The comment is noted.

**SECTION 27**  
**BURNING HILLS WSA**

**27.1 COMMENT:** Interestingly, BLM, in its proposed alternative, has failed to include the Burning Hills and Death Ridge WSAs. These areas also include portions of the Kaiparowits Plateau coal deposits. These areas are bracketed by the Wahweap WSA to the west and by the Fifty Mile Mountain WSA to the east. If both the Wahweap and the Fifty Mile Mountain WSAs are designated as wilderness, the likelihood of developing the 2,528 billion tons of coal located within the Burning Hills and Death Ridge WSAs will be significantly reduced. The buffer policy of protection for the Wahweap and Fifty Mile Mountain areas will severely limit the development potential for both Burning Hills and Death Ridge. Any activities within the Burning Hills and Death Ridge areas will likely be regulated to such an extent as to make them de facto wilderness areas. [Utah Mining Association]

**27.1 RESPONSE:** This is no BLM "buffer policy." See response to Specific Comment 26.3.

**27.2 COMMENT:** Burning Hills is not recommended because of its coal conflicts. The Draft EIS acknowledges that the coal under the Kaiparowits Plateau faces "significant economic and environmental problems" to be overcome before it is mined. The coal will not be mined in the foreseeable future. Meanwhile, the wilderness resource that exists will continue to be eroded by oil drilling, ORV use, and other activities. [Utah Wilderness Association]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 27: BURNING HILLS WSA (CONTINUED)

**27.2 RESPONSE:** See response to Specific Comment 26.24. BLM management under the Interim Management Policy will prevent unnecessary impact to the wilderness resource until Congress makes a determination on designation or nondesignation of the WSA as part of the National Wilderness Preservation System.

**27.3 COMMENT:** The Draft EIS fails to give any compelling reasons for dropping this marvelous undisputed wilderness. Only one reason for deletion is given--coal development. This area is world-class wilderness, but the Draft EIS says that it should be dropped from further wilderness consideration because of "moderate potential" for coal recovery. The Draft EIS also states that "coal is more readily accessible and of better quality" in nearby areas. Any coal extraction in this area would have to be done by strip mining--a process that would totally destroy these arid and fragile lands forever. It is just not possible to reclaim desert lands. The cost of energy development on these lands would be enormous and irrevocable. The wilderness qualities of Burning Hills and their value as wildlife habitat are much more important than a possible short-term economic gain with terrible consequences. I strongly urge you to change your recommendation from "No Wilderness" to "All Wilderness" for this remote, lovely, and irreplaceable WSA. [Scott DeLong]

**27.3 RESPONSE:** BLM believes that the known coal resource should be given precedence over the wilderness values in this WSA, as noted in Appendix 11 of Volume I of the Final EIS. It is recognized that coal development in the Kaiparowits Plateau would probably not occur until beyond the year 2020. It should also be noted that all coal development on the plateau would be by underground mining methods; the resource is too deep for consideration of surface mining. BLM projects up to 20 acres of surface disturbance for each surface facility.

**27.4 COMMENT:** BLM failed to evaluate extensively within existing limitations, the feasibility for coal development. BLM failed to consider Partial Wilderness Alternatives for this area. BLM lacks rationale for proposing nonwilderness because of potentially unfeasible conflicts. We support the designation of a majority of this core Kaiparowits area. [Utah Wilderness Coalition]

**27.4 RESPONSE:** BLM has evaluated the coal potential and the likelihood of development. The situation

relative to short and long term production feasibility with the Burning Hills WSA is similar to that of the Wahweap WSA. See the responses to Specific Comments 26.24, 26.31, and 27.3.

**27.5 COMMENT:** The Draft EIS states that "coal is more readily accessible and of better quality" in nearby areas. Yet, it appears that BLM has recommended no wilderness for this sensitive area because of the coal found here. Any energy development here would be very costly and would impact wildlife habitat. [Sierra Club, Cache Group]

**27.5 RESPONSE:** See the response to Specific Comment 27.3. In the long-term future, it is anticipated that coal would be extracted by underground mining methods. Underground mining of coal would have limited impacts to wildlife in the WSA. Such impacts would be concentrated at portal, processing, and stockpiling locations.

**27.6 COMMENT:** We agree with the conclusion that oil and gas resources in WSAs will be essentially foregone under the so-called "preferred alternative." Specifically, our company concludes that inclusion of the following WSAs would adversely affect potential hydrocarbon exploration and development: Canaan Mtn., Parunuweap Canyon, Moquith Mtn., Paria-Hackbury, Wahweap, Burning Hills, and Fifty Mile Mtn. Enclosed is a geologic overview and critique of the Greater Kaiparowits Basin in Southern Utah. This report was prepared by Daniel D. Tisoncik, Senior Staff Geologist, Champlin Petroleum Company. His report cites the 21 million barrel Upper Valley field in Garfield County. [Champlin Petroleum Company]

**27.6 RESPONSE:** BLM's proposal is No Action/No Wilderness for the Burning Hills WSA. This would not affect oil and gas resources. Also see the response to Specific Comment 26.29.

**27.7 COMMENT:** In the Draft Environmental Impact Statement, the statement is made that the coal reserves contained in the Burning Hills and the Wahweap WSAs amounts to 92 million tons. These are not theoretical computerized reserves, these are based on actual mining plans which are on file in the Mineral Management Branch of BLM and also the State Board of Oil, Gas, and Mining. It would be appropriate for BLM to re-examine the SAI appraisals of the resources within those two WSAs. [James Quigley]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 27: BURNING HILLS WSA (CONTINUED)**

**27.7 RESPONSE:** See the response to Specific Comment 26.28.

**27.8 COMMENT:** The Alton coal field illustrates many of the problems inherent in developing southern Utah coal. Part of this field was designated unsuitable for strip mining by the U.S. Office of Surface Mining, owing to severe environmental constraints, including adverse impacts on visual resources, hydrologic impacts, and difficult revegetation. The latter problem is significant; Federal law prohibits surface coal mining in areas where native vegetation communities cannot be reestablished and maintained. Throughout southern Utah, but particularly in the severe climates and thin soils of wildland areas, revegetation may well be a fantasy. [Utah Wilderness Coalition]

**27.8 RESPONSE:** See the response to Specific Comment 26.27.

**27.9 COMMENT:** AMCA is the record assignee of 40,277 acres of Federal coal leases and 6,210 acres of Utah State coal leases in the Kaiparowits coal fields, an important part of which lies within the Wahweap and Burning Hills WSAs and all of which is adversely affected by potential transportation problems resulting from the adjoining Mud Spring Canyon and Death Ridge WSAs. BLM studies and final recommendations eliminate all of these WSAs from their preferred alternative shown on Pocket Map 4, "Paramount Wilderness Quality Alternative." The coal measures underlying these WSAs contain the largest reserve of quality coal in the western U.S. which has remained undeveloped because of lack of transportation. In 1960 an active exploration program in preparation for a mine-mouth powerplant began. This work demonstrated over 400,000,000 tons of coal, fully explored and ready for mining. The mine-mouth powerplant project died after a long controversy over the impact of a second plant in the Glen Canyon area. Locking up these reserves in a wilderness area would deprive the southwest States of a major energy base sufficient to serve the needs of power generation and gas liquid fuel conversion for generations to come. We urge BLM to withdraw Wahweap, Burning Hills, Mud Springs, and Death Ridge WSAs from further consideration. They contain known reserves on which many millions of dollars have been spent in exploration, mine planning, permitting, and water acquisition. [AMCA]

**27.9 RESPONSE:** See the response to Specific Comment 26.24.

**27.10 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration. Analyses of the coal in the western portion of the Burning Hills WSA compare favorably with Wasatch Plateau coal. Access to mining of the coal in the region are vital. Long-wall mining should be able to significantly improve BLM estimate of 30 to 50 percent recovery of the 928 MMT minable reserve. The WSA should have a very high priority for coal development. [Utah International, Inc.]

**27.10 RESPONSE:** The coal resource and development potential are described in the Final EIS. See the response to Specific Comment 26.38 regarding long-wall mining.

**27.11 COMMENT:** The coal reserves in the Central Utah coal fields are largely either mined out, or committed on a long-term basis. Therefore, any significant new growth will require a new source of coal for fuel. Coal from large strip reserves in eastern Wyoming is not practical to users in the far west because of long rail hauls and low Btu value of that field. The Kaiparowits field is uniquely suited to fill this need. [AMCA]

**27.11 RESPONSE:** See the response to Specific Comment 26.31.

**27.12 COMMENT:** The Resources Company drilled 202 holes on the leasehold. Information includes plats showing structural contours and isopachs of various seams, cover lines, and all data needed for mine layout and planning. The work was incorporated into an application to mine filed with the then USGS Minerals Conservation Branch which is now the Minerals Management Division of BLM and the Utah Division of Oil Gas and Mining. The application consisting of many volumes is in the files of those agencies and available for inspection. If these WSAs are not eliminated from the EIS, mining from this field will be precluded, this tremendous resource will be lost, and last but certainly not least, the \$25 million spent on exploration, planning, and development will have been wasted. This scenerio would be tragic. [AMAC]

**27.12 RESPONSE:** See the response to Specific Comment 26.25.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 27: BURNING HILLS WSA (CONTINUED)**

**27.13 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work and perhaps, exploratory drilling to determine if such deposits do exist, and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geologic data which led us to this recommendation. [Exxon Corporation]

**27.13 RESPONSE:** Information presented by the various energy and mineral companies has been reviewed, considered, and generally reflected in the EIS information.

**27.14 COMMENT:** BLM suggests that development of the (coal) resource will create significant economic and environmental difficulties. The majority of these economic and environmental difficulties are the direct result of BLM's current management of practically the entire Kaiparowits Plateau as a WSA. Valuation of these deposits should be based upon the willingness of the lessees of the 25 current coal leases within these WSAs to continue to make rental payments. Valuation should not be diminished by artificial BLM-created obstacles. [Utah Mining Association]

**27.14 RESPONSE:** See the response to Specific Comment 26.26.

**27.15 COMMENT:** Transportation to the markets in the southwest can be accomplished by truck to rail sites and thence to market. The truck haul is somewhat longer than the 85-mile haul to the railroad presently made in Central Utah from Salina Canyon to Levan. Although this seems potentially a large cost, this truck haul serves to reduce the rail haul to the southwest by 200 miles and equates to a cost saving, not an extra expense. Costs per ton mile for rail vs. trucks over short hauls have been narrowing for years. When this trend will level off cannot be predicted. However, under present costs, coal can be moved from Kaiparowits to southwestern markets at

costs comparable with coal from Central Utah. [AMCA]

**27.15 RESPONSE:** See the response to Specific Comment 26.30.

**27.16 COMMENT:** It is asserted that the All Wilderness Alternative would have a negative impact on wildlife because water is limiting for wildlife and wildlife would be negatively impacted by the prevention of 1,000 acres of land treatments. This assertion does not consider wildlife in the broad sense. [Scott Mills]

**27.16 RESPONSE:** The vegetative treatments have been proposed specifically to provide for improved habitat for wildlife. It then follows that if these treatments are not carried out, then the wildlife potential would be negatively affected. The animals now present in the WSA would not be affected by wilderness designation, but growth in wildlife populations would be limited.

**27.17 COMMENT:** BLM lists the number of raptors present in the WSA. The specific species should be listed and accompanied by brief descriptions of particular habitat requirements. [Scott Mills]

**27.17 RESPONSE:** See the response to Specific Comment 26.39.

**27.18 COMMENT:** Important mountain lion habitat and bighorn sheep habitat (using bighorn sheep in 1981 and 1982 from the nearby NRA) can be found here. Such habitat will receive proper protection from damaging development only through wilderness protection. The area also includes crucial winter deer range. In addition, bald eagles and peregrine falcons migrate through this WSA and surrounding lands. [Sierra Club, Cache Group]

**27.18 RESPONSE:** Wilderness designation would provide sanctuary for species such as cougar (mountain lion) and bighorn sheep. Wilderness designation would limit opportunities for improvement of deer winter range. Wilderness designation would have little affect on the raptors unless the WSA were to be used as resident habitat.

**27.19 COMMENT:** The Table 1 of the Draft EIS for this WSA presents an excellent argument against Federal subsidy of grazing on BLM land. The Proposed Action (No Action) would develop a spring, a



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 27: BURNING HILLS WSA (CONTINUED)**

catchment, three wells, five cattle guards, 3.25 miles of fence, a mile of trail, and 872 acres of land treatment, which I assume is chaining, burning, and seeding. All this work would potentially increase grazing by 100 AUMs and would add only \$140 a year to the Federal revenue! [Jean Soko]

**27.19 RESPONSE:** The potential livestock developments would not necessarily be funded by BLM. Livestock operators may do some of the work, some may be done with return of grazing fees, and some may be done by BLM. The detailed arrangements and funding would be determined at the time the work is planned in detail. Also, at that time a cost-benefit review would be conducted.

**27.20 COMMENT:** The scenic values found here are very significant because of the reddened knolls from the spontaneous coal fires. These fires are an unusual feature and would add a unique feature to the National Wilderness Preservation System. With Fifty Mile Mountain, this area comprises a very remote and untouched corridor of the Kaiparowits Plateau. [Sierra Club, Cache Group]

**27.20 RESPONSE:** The phenomenon of spontaneous coal fires has been noted as a special feature in the Final EIS. It is discussed as both "an educational area depicting the geological changes that have resulted over the ages from naturally occurring coal fires" and as a "scenic area."

**27.21 COMMENT:** Visual Resources: Most of the Class A scenic quality area has been improperly excluded from a Class II VRM classification and most of the Class B scenic quality area has been downgraded to Class IV VRM classification. [Owen Severance]

**27.21 RESPONSE:** The source of the scenic quality and VRM ratings is the Paria MFP. The MPF visual resource evaluation was contracted to Roy Mann Associates, Inc., who were to follow the procedures set forth in the BLM manual. It is true, however, that there are discrepancies between what the VRM ratings are in the MFP and what they should be if the BLM manual had been more accurately followed. We have used the VRM ratings given in the Paria MFP because the VRM ratings are currently in affect. The continued managing of Class A scenery as VRM Class III or IV rather than Class II is a greater risk to the scenic values of the WSA should wilderness designation not occur.

**27.22 COMMENT:** We disagree with BLM's final conclusions that significant opportunities for outdoor primitive recreation and solitude do not exist throughout this WSA. The Burning Hills wilderness area, as proposed by the Utah Wilderness Coalition, has outstanding solitude and primitive outdoor recreation opportunities within a natural setting. [Sierra Club, Cache Group]

**27.22 RESPONSE:** See the responses to Specific Comments 26.47 and 26.51.

**27.23 COMMENT:** As far as the WSA itself is concerned, Burning Hills with its red colored landscapes, its badlands, and its canyon systems and mesa tops deserves wilderness protection. But the fallacy of the acre-by-acre scrutinization of "outstandingness" illustrated by the minimization of the wilderness values assigned to this WSA has broader implications. The Draft EIS does not set forth standards for determining when solitude is outstanding or when any one given form of primitive recreation is outstanding. Further, the determination of any one acre's "outstandingness" is often made by divorcing that acre from its surroundings. The lack of standard and the tendency to not view units as a whole make the Draft EIS' evaluation of wilderness characteristics arbitrary. Moreover, standardless evaluations and evaluations which view land out of context lead to faulty results. At best, the lack of standards and the tendency to take land out of context opens the process up to subconscious favoritism. At worst, it opens the process up to abuse. A proper evaluation of Burning Hills' wilderness values would make the choice between wilderness values and mineral values more difficult to make than the Draft EIS has portrayed it. There is no excuse for the distortion that has occurred. [Utah Wilderness Association]

**27.23 RESPONSE:** See the responses to Specific Comments 26.47 and 26.51.

**27.24 COMMENT:** The visual resource inventory says that 15,690 acres in the WSA have Class A scenery. The Draft EIS says that 27,500 acres of the unit possess scenic values with 13,000 such acres in the Burning Hills and the remainder in lower Last Chance Creek Canyon. Acres totaling 43,550 have Class B scenery. Yet the Draft EIS finds no outstanding opportunities for primitive and unconfined recreation exist anywhere in the unit.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 27: BURNING HILLS WSA (CONTINUED)**

The existing wilderness resource is terribly underrated. The WSA is large, over 61,000 acres. Fifty-one percent of the WSA is rock outcrop. Densely vegetated plateau tops separated by three major canyon systems, together with badlands and the Burning Hills, make up the unit. Yet the Draft EIS somehow concludes that only 27,700 acres offer outstanding opportunities for solitude. That figure is simply inconsistent with the land and even the Draft EIS description of it. A far more accurate understanding of the outstandingness of the opportunities present can be gained by simply looking at the map and reading the visual resource inventory results. The visual resource inventory notes that only 2,310 acres of the 61,500-acre WSA are monotonous. Elsewhere, the visual resource is classified either Class A or Class B. One would assume that a Class A or B rating demands a significant degree of topographic relief, and a simple glance at the map confirms that. Curiously, the areas said to have outstanding opportunities for solitude are basically different from the areas said to possess scenic values. Dry Wash Canyon, Last Chance Creek Canyon, the northern portion of Reese Canyon, Window Sash Bench, and Dry Bench are the major areas said to have outstanding solitude. Only below Smoky Mountain does any significant overlap in the "outstanding solitude" and "outstanding scenic" areas occur. The lack of overlap between the areas rated as "outstanding" for solitude purposes and those rated as "outstanding" for scenic values (but not primitive recreation!) itself discredits the accuracy of the Draft EIS assessment of wilderness values. [Utah Wilderness Association]

**27.24 RESPONSE:** The scenic value of the WSA is considered to be a special feature. Scenic quality does not, however, necessarily correlate with outstanding opportunities for solitude or primitive recreation.

**27.25 COMMENT:** The analysis of opportunities for solitude and recreation are illogical. [Kim Jennyson, et al.]

a. The variety of topographic areas include undulating plateaus, deep canyons, and brightly reddened, rounded knolls allow for outstanding opportunities for solitude. The Draft EIS states "areas within the unit that lack both vegetative and topographic screening are not considered to have outstanding opportunities for solitude." BLM should not be analyzing solitude using only the amounts of vegetative and topographic screening. The definition on Draft EIS page 217, Volume I, states solitude is the state of remoteness or

lack of habitation. The Draft EIS even states the unit is so remote ORV use is practically nonexistent, yet less than 50 percent of the unit qualifies for wilderness? Outstanding opportunities for recreation include: dayhiking, backpacking, painting, and exploring for fossils or for bighorn sheep or peregrine falcons. There is a possibility to take extended backpacking trips which would originate in Burning Hill and finish in Fifty Mile Mountain WSA or in Glen Canyon Recreation Area.

b. The analysis of wilderness values in the Burning Hills is flawed by logical contradictions. The document states, "The Burning Hills WSA offers limited recreation opportunities." If the unit meets minimum standards for designation, its wilderness values can not be unexceptional. The BLM ignores wildlife use which depends on the remote and natural terrain, its water sources, and the abutting candidate wilderness areas.

**27.25 RESPONSE:** See the response to General Comment 22.3.

**27.26 COMMENT:** The large size of the WSA was ignored in determining the area with outstanding solitude, resulting in the ridiculous claim that only 45 percent of the WSA offers outstanding opportunities for solitude. Primitive recreation rated only one sentence in the Draft EIS (an example of succinct negative bias). "The diversity in the number of primitive and unconfined recreational activities possible in the inventory unit" (Wilderness Inventory Handbook, page 14) was not considered. The presence of coal in the WSA has led to this distorted presentation by the Cedar City District. [Owen Severance]

**27.26 RESPONSE:** See the response to General Comment 22.3. The presence of the coal resource is not a factor in the determination of wilderness values, including solitude.

**27.27 COMMENT:** Burning Hills WSA is ranked low in wilderness quality and high in significance of conflicts in this part of the region. The primary reason being potential coal developments. Further study is needed as to the best method of protection of cultural resources, as well as wildlife values (bighorn sheep). [State of Utah]

**27.27 RESPONSE:** Cultural resources are protected using the methods of avoidance, mitigation, and/or salvage. Numerous specific procedures and techniques

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 27: BURNING HILLS WSA (CONTINUED)**

may be followed. This protection is done in compliance with several specific archaeological and historic preservation laws, regardless of whether BLM-administered lands are designated wilderness or used for other purposes.

**27.28 COMMENT:** Wilderness designation coincides with natural zone and recommended wilderness in the Glen Canyon GMP for these areas: Burning Hills, Escalante Canyon Tract 5, Horseshoe Canyon South, Fidler Butte, Little Rockies, Grand Gulch, and Dark Canyon. [National Park Service]

**27.28 RESPONSE:** The EIS notes where BLM wilderness alternatives would complement a similar management objective on the adjacent lands administered by the National Park Service. According to current maps, the Burning Hills WSA is not adjacent to lands which the National Park Service has recommended for wilderness designation.

**27.29 COMMENT:** As a utility certificated and franchised to serve in the State of Utah, UP&L must meet its responsibility of planning and building for the public's future electrical needs. Economically, it is more advantageous to build a mine-mouth generating plant, as located in Emery County. However, in order to develop the coal in its Kaiparowits coal field lease, it may be necessary to transport the coal to a less environmentally sensitive area to generate electricity. UP&L has worked with railroad engineers to develop a viable and feasible transportation route, avoiding serious impact on the WSAs included in BLM's Proposed Action alternative. The proposed railroad routes from the Kaiparowits coal field mines to be developed by UP&L would cross and substantially impact WSAs 27 (Burning Hills) and 28 (Death Ridge), as well as cross the southern tip of WSA 26 (Wahweap) and adjoin the western boundary of WSA 25 (The Cockscomb). A map of UP&L proposed rail route is included with these comments. [Utah Power and Light]

**27.29 RESPONSE:** The possible need for future coal transportation route corridors is identified in the EIS. See the response to Specific Comment 26.37.

**27.30 COMMENT:** BLM has not evaluated the need and alternatives for transportation corridors. BLM is violating the planning and utility corridor analysis requirements in deleting areas for potential corridors which are proposed outside BLM assessment process.

BLM claims that future transportation corridors pose conflicts with wilderness designation. In many cases large areas are deleted to accommodate such corridors. BLM provides no maps describing the location of the proposed corridors for any of the wilderness study areas involved. In the case of Mud Springs, BLM claims a "future rail or coal slurry pipeline" would cross the area. BLM stated that the "Kaiparowits Coal Development and Transportation Study for Southern Utah" describes the proposal. The consultant who prepared this document offers only general conceptual ideas which describe broad areas where corridors may be proposed. The conceptual corridors are up to 15 miles wide and six alternate routes are described. BLM uses this as the sole justification for deleting large parts or all of wilderness study areas from wilderness study. There are several problems with what BLM is proposing. The first is giving a consultant's report the status and weight of a land use plan. The report has not gone through the planning process nor had an EIS prepared on it. It has not complied with BLM's procedures for the designation and management of rights-of-ways. The public has had no opportunity for participation. For these reasons this document cannot be considered a land use planning document and should be subject to general comments from the public. A utility corridor 15 miles wide is an absurdity. It represents nothing more than the effort by interested parties to keep every option open; that is understandable. What is difficult to understand is BLM's use of such a "wish list" as a serious proposal sufficient to disqualify an area for wilderness. BLM has demonstrated no need for these corridors. There has been no justification for any--much less all--of these provided to the public. BLM's decision to use the corridors as real conflicts is arbitrary. It is not supported by BLM's planning process. BLM falsely states the potential for corridor designation and the amount of land the corridor would occupy. BLM should apply each of the required criteria when considering transportation corridors (43 CFR 2806.1) in the wilderness study. We ask that BLM describe how the criteria have been used, as well as which have not been used. A majority of the corridors proposed could be served with existing rights-of-ways. BLM fails to describe the current rights-of-way, their present use, their capacity, and the feasibility of using them for additional facilities. Common sense requires such an evaluation. We recommend that BLM drop transportation corridors as a wilderness conflict in the EIS unless the analysis described above is performed. To be fair, BLM must give equal weight to wilderness values and to proposals for

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 27: BURNING HILLS WSA (CONTINUED)

commercial uses. Apparently pre-existing development proposals were given precedence. [Utah Wilderness Coalition]

**27.30 RESPONSE:** BLM has not violated the corridor requirements. The Wilderness EIS does not state that the routes in question are formally designated corridors in BLM RMPs. These areas and the criteria for formal designation will be further considered during the preparation of the Escalante RMP scheduled for completion in 1998. Nonetheless, the corridors have been identified in conceptual planning studies and must be recognized in the wilderness trade-off analysis as future considerations. Both wilderness factors and nonwilderness factors have been given fair treatment in the EIS and in the determination of BLM Proposed Action. Also, see the responses to Specific Comments 25.24 and 26.10.

**27.31 COMMENT:** The State receives 50 percent of the royalty from coal mined from Federal leases, and this money is distributed to various governmental, community, and educational bodies for public purposes. Locking up this income from coal would have a wide effect by crippling the State's ability to aid communities all over the State and impact the operating income of the Board of Regents, the Utah Department of Education, and the State's reclamation program. [AMCA]

**27.31 RESPONSE:** No coal currently is mined from the Burning Hills WSA, and future mining would not be precluded by BLM Proposed Action of No Action/No Wilderness for this WSA. Also, see the response to Specific Comment 26.55.

**27.32 COMMENT:** A minimum of 75 well paid jobs would be required for a start-up mine and the benefits on the surrounding communities would be substantial. The share of Federal royalty going to State institutions would be significant and as State leases were opened up, larger sums per ton of production would be available to education through the State Division of Lands and Forestry. We believe that State and local officials should speak for themselves, but without question the well being of the region would be permanently damaged by the continued inclusion of Wahweap, Burning Hills, Death Ridge, and Mud Springs Canyon in the wilderness study program. [AMCA]

**27.32 RESPONSE:** Due to market considerations, transportation, and other factors apart from the wil-

derness study, no coal from the Burning Hills WSA is expected to be extracted in commercial quantities in the foreseeable future (i.e., prior to the year 2020). There is potential for coal development in the long-term future, and this is recognized in the EIS. Also, see the response to Specific Comment 26.54 and Appendixes 6 and 11.

**27.33 COMMENT:** The reported size and dimensions of the WSA are wrong. [Owen Severance and Brian Wood]

a. Page 14 wrongly claims that the size of the WSA is 4 miles by 2.25 miles when the correct size is 22 miles by 6 miles. (It would appear that the first figure is wishful thinking - a WSA that small would be easy for the Cedar City District to eliminate from wilderness consideration.)

b. How can 61,550 acres be squeezed into 4 miles by 2.25 miles.

**27.33 RESPONSE:** The WSA has a length of about 22 miles and a maximum width of 9 miles. The text has been corrected.

**27.34 COMMENT:** Desert bighorn sheep frequent the area. Mule deer are yearlong residents, not winter visitors only. There is a current proposal to stock bighorn sheep into an area of the Glen Canyon recreation Area, just south of the WSA. These sheep could move into the Burning Hills WSA. [State of Utah]

**27.34 RESPONSE:** The text discusses the possibility of desert big horn sheep moving into the WSA. This discussion is found in the Wildlife section.

## SECTION 28

### DEATH RIDGE WSA

**28.1 COMMENT:** We fully endorse the Utah Wilderness Coalition's 56,000-acre proposal for Death Ridge. Note that this is smaller than the 62,870-acre WSA. [Sierra Club, Cache Group]

**28.1 RESPONSE:** A Partial Wilderness Alternative of 56,000 acres was considered in response to this comment. It was eliminated from detailed analysis because the anticipated impacts would not be appreciably different from those discussed for the All Wilderness Alternative.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 28: DEATH RIDGE WSA (CONTINUED)**

**28.2 COMMENT:** Interestingly, BLM, in its proposed alternative, has failed to include the Burning Hills and Death Ridge WSAs. These areas also include portions of the Kaiparowits Plateau coal deposits. These areas are bracketed by the Wahweap WSA to the west and by the Fifty Mile Mountain WSA to the east. If both the Wahweap and the Fifty Mile Mountain WSAs are designated as wilderness, the likelihood of developing the 2,528 billion tons of coal located within the Burning Hills and Death Ridge WSAs will be significantly reduced. The buffer policy of protection for the Wahweap and Fifty Mile Mountain areas will severely limit the development potential for both Burning Hills and Death Ridge. Any activities within the Burning Hills and Death Ridge areas will likely be regulated to such an extent as to make them de facto wilderness areas. [Utah Mining Association]

**28.2 RESPONSE:** There is no BLM "buffer policy." See the response to Specific Comment 26.3.

**28.3 COMMENT:** We recommend that all of the area be designated to protect the integrity of the Kaiparowits Plateau, one of the largest natural regions in America. The impacts are extremely few and limited to the touching boundaries of a large family of wilderness study areas which all deserve wilderness designation. [Utah Wilderness Coalition]

**28.3 RESPONSE:** Substantial portions of the Kaiparowits Plateau are included in BLM Proposed Action for wilderness designation. All of the Plateau is not proposed because of other resource use considerations and/or lack of wilderness qualities.

**28.4 COMMENT:** BLM must also consider whether the wilderness values lost outweigh the coal development benefits. With the many restrictions that must be required to protect other resources, benefits from coal development would be greatly reduced; other sources exist to meet energy needs. The wilderness values are high and cannot be found elsewhere. [Utah Wilderness Coalition]

**28.4 RESPONSE:** BLM believes that for this WSA the potential long-term coal opportunities should take precedent over the wilderness attributes.

**28.5 COMMENT:** Death Ridge is considered to have low wilderness values and very high conflicts with potential coal development. [State of Utah]

**28.5 RESPONSE:** The EIS analysis is consistent with this observation.

**28.6 COMMENT:** It appears that potential coal development has been used to drop this area from wilderness consideration. The value of this potential coal development has been over emphasized with regard to other values involving recreation, naturalness, and wildlife habitat. [Sierra Club, Cache Group]

**28.6 RESPONSE:** See the response to Specific Comment 28.4. All of the various resource values have been fully considered, in addition to the coal potential.

**28.7 COMMENT:** As is typical of the agency through this entire process, BLM gives no rationale for its recommendation of nonwilderness. BLM does not link the data available with its analysis and conclusions. BLM's decision appears arbitrary without these clear links. [Utah Wilderness Coalition]

**28.7 RESPONSE:** See the responses to General Comments 8.1 and 8.2, and Appendix 11 in Volume I.

**28.8 COMMENT:** Death Ridge contains beautiful scenic views that contribute to the outstanding naturalness of the WSA. Throughout this WSA one can find many opportunities for high quality primitive recreation and experience exceptional solitude. It is unfortunate that BLM found no suitable acres for wilderness in this 62,870-acre WSA. We support the Utah Wilderness Coalition's 56,000-acre proposal which does exclude all significant impacts. The entire WSA should not be withdrawn from wilderness consideration by Congress because of these limited human impacts. [Sierra Club, Cache Group]

**28.8 RESPONSE:** The WSA does rate particularly high in the BLM visual resource management system. See the response to Specific Comment 28.4.

**28.9 COMMENT:** This WSA has important stands of Ponderosa pines which will only receive adequate protection through wilderness designation. These pines have little economic value, but they do provide important habitat. [Sierra Club, Cache Group]

**28.9 RESPONSE:** The EIS notes the presence of Ponderosa pine in the text on vegetation and in wilderness special features. Wilderness designation is not the only management option which would protect this species.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 28: DEATH RIDGE WSA (CONTINUED)**

**28.10 COMMENT:** While coal is present in the area, BLM does not address the key issues in coal development. BLM failed to consider underground coal mining which would not affect surface or water resources. Almost all the coal qualifying for extraction could be taken out with mine access on the border of or outside the WSA, resulting in no surface disturbances. BLM did not consider mining methods that would not disturb wilderness resources, and thus would not conflict with wilderness designation of this area. We request that consideration be given to designation, assuming underground extraction of coal. [Utah Wilderness Coalition]

**28.10 RESPONSE:** The analysis in the EIS is based on the assumption that coal would be mined by underground methods. Surface facilities and underground access portals would most likely be on the east side of the WSA where the coal seams are nearest the surface and most easily accessible. Regardless of point of access, coal could not be leased following wilderness designation.

**28.11 COMMENT:** Death Ridge WSA overlies most of Utah Power & Light's Federal coal lease U-1362 and contains nearly 500,000,000 tons of recoverable coal. There are 17 other coal leases within the WSA's 63,000 acres and an additional 400 million tons of coal represented by Preference Right Leases. The mineral rating system in the Draft EIS classifies this WSA f4 for resources favorability c4 for certainty, giving this WSA the highest possible rating. These coal lands also have been identified as part of the KRCRA and have undergone the unsuitability criteria without a negative determination, and no restrictions on mining should be applied to them. There are few current mining activities within the KRCRA. Investors are reluctant to risk substantial capital in a wilderness study area, and problems are compounded because of limited access, the high cost of underground mining, lack of water, and competition from other nearby sources. However, if this WSA is designated a wilderness area, not only would the coal resource be lost, but the potential reserves as well. [Utah Power and Light]

**28.11 RESPONSE:** BLM Proposed Action for this WSA is the No Action/No Wilderness Alternative. Feasibility of mining for commercial production is the same as that of the Wahweap WSA as explained in the response to Specific Comment 26.24.

**28.12 COMMENT:** The Resources Company drilled 202 holes on the leasehold. Information includes plats showing structural contours and isopachs of various seams, cover lines, and all data needed for mine layout and planning. The work was incorporated into an application to mine filed with the then USGS Minerals Conservation Branch which is now the Minerals Management Division of BLM and the Utah Division of Oil Gas and Mining. The application consisting of many volumes is in the files of those agencies and available for inspection. If these WSAs are not eliminated from the EIS, mining from this field will be precluded, this tremendous resource will be lost, and last but certainly not least, the \$25 million spent on exploration, planning and development will have been wasted. This scenario would be tragic. [AMCA]

**28.12 RESPONSE:** See the response to Specific Comment 26.25.

**28.13 COMMENT:** AMCA is the record assignee of 40,277 acres of Federal coal leases and 6,210 acres of Utah State coal leases in the Kaiparowits coal fields, an important part of which lies within the Wahweap and Burning Hills WSAs and all of which is adversely affected by potential transportation problems resulting from the adjoining Mud Spring Canyon and Death Ridge WSAs. BLM studies and final recommendations eliminate all of these WSAs from their preferred alternative shown on Pocket Map 4, "Paramount Wilderness Quality Alternative". The coal measures underlying these WSAs contain the largest reserve of quality coal in the western United States which has remained undeveloped because of lack of transportation. In 1960 an active exploration program in preparation for a mine-mouth powerplant began. This work demonstrated over 400,000,000 tons of coal, fully explored and ready for mining. The mine-mouth powerplant project died after a long controversy over the impact of a second plant in the Glen Canyon area. Locking up these reserves in a wilderness area would deprive the southwest States of a major energy base sufficient to serve the needs of power generation and gas liquid fuel conversion for generations to come. We urge BLM to withdraw Wahweap, Burning Hills, Mud Springs, and Death Ridge WSAs from further consideration. They contain known reserves on which many millions of dollars have been spent in exploration, mine planning and permitting, and water acquisition. [AMCA]

**28.13 RESPONSE:** See the response to Specific Comment 26.24.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 28: DEATH RIDGE WSA (CONTINUED)**

**28.14 COMMENT:** The agency's main objection to wilderness designation is the existence of hydrocarbons in the WSA. While the analysis argues that the deposits of coal, estimated by the Bureau at 1.6 billion tons, are "minable," geologists have questioned for many years whether the coal beneath the Kaiparowits Plateau can ever be extracted and/or transported from the region profitably. The history of the Kaiparowits coal issue would lead to the conclusion that this coal may never be developed commercially. Such development just is not feasible. In addition, the analysis should address whether or not better opportunities for coal development are available on other public or private lands. [Utah Wilderness Coalition]

**28.14 RESPONSE:** See the responses to Specific Comments 26.24, 26.25, and 26.26 and General Comments 15.43 and 24.9.

**28.15 COMMENT:** The Draft EIS states 13,590 acres as leased before FLPMA for oil and gas, and 15,055 acres as leased before FLPMA for coal. The Draft EIS, however, does not provide a map to show the location of those leases. We request that a map be provided. [Utah Wilderness Coalition]

**28.15 RESPONSE:** A map showing the location of lease is not essential to the EIS analysis. The text has been revised to indicate that 3,863 acres of oil and gas leases (1,378 pre- and 2,485 post-FLPMA) and that 19,381 acres of coal leases (pre-FLPMA) remain in the WSA (as of July 1988). The leases are mostly located in the eastern half of the WSA.

**28.16 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Wilderness Study Areas 22, 23, 28, and 32 are situated in the Kaiparowits Basin of south central Utah. The hydrocarbon potential of this basin is relatively unexplored, since only a few test wells have been drilled in the area. One large oil field, Upper Valley, has been discovered in the basin, and it is reasonable to believe that other hydrocarbon accumulations exist in sedimentary rocks of Paleozoic geologic age. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**28.16 RESPONSE:** This WSA is presently rated as f3/c1. Because of low certainty, oil and gas exploration is not expected in the foreseeable future.

**28.17 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work and perhaps, exploratory drilling to determine if such deposits do exist, and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geologic data which led us to this recommendation. [Exxon Corporation]

**28.17 RESPONSE:** See the response to Specific Comment 26.32.

**28.18 COMMENT:** BLM suggests that development of the (coal) resource will create significant economic and environmental difficulties. The majority of these economic and environmental difficulties are the direct result of BLM's current management of practically the entire Kaiparowits Plateau as a WSA. Valuation of these deposits should be based upon the willingness of the lessees of the 25 current coal leases within these WSAs to continue to make rental payments. Valuation should not be diminished by artificial BLM-created obstacles. [Utah Mining Association]

**28.18 RESPONSE:** See the response to Specific Comment 26.26.

**28.19 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration: Has the potential for recovery of up to 800 MMT of coal. BLM should assign a high occurrence and favorability factor to coal development. F and C factors of 3+ were assigned by BLM, they should be 4. There are 1.587 BT minable to 2000' depth. The area should

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 28: DEATH RIDGE WSA (CONTINUED)**

be given very high priority for coal development. [Utah International, Inc.]

**28.19 RESPONSE:** The information on coal in the WSA has been reviewed. BLM has determined that the occurrence and favorability factors for coal were essentially correct in the Draft EIS and few changes have been made for the Final EIS. However, the narrative on coal has been revised to reflect new information. The long-term potential for coal extraction is recognized in the rationale for BLM's Proposed Action which is the No Action/No Wilderness Alternative. See Appendix 11 in Volume I.

**28.20 COMMENT:** The coal reserves in the Central Utah coal fields are largely either mined out or committed on a long-term basis. Therefore, any significant new growth will require a new source of coal for fuel. Coal from large strip reserves in eastern Wyoming is not practical to users in the far west because of long rail hauls and low Btu value of that field. The Kaiparowits field is uniquely suited to fill this need. [AMCA]

**28.20 RESPONSE:** See the response to Specific Comment 26.31.

**28.21 COMMENT:** The f3 rating for oil and gas should be lowered. The Draft EIS notes that the only oil and gas production in the vicinity is from the Upper Valley field. It goes on to state that it is doubtful that the structure contains any oil in the WSA. It appears there is a low likelihood for oil and gas rather than a moderate to high likelihood as the rating implies. We do not argue the fact that the WSA contains significant coal deposits. However, as SAI has pointed out, it is unlikely given the environmental, economic, and political constraints that this coal can ever be mined. Therefore it is foolish to weigh this coal resource so heavily in determining the area's suitability for wilderness. Unfortunately, BLM's recommendation will not protect the area's wilderness values nor will it make coal development feasible. It will only allow the wilderness resource to be eroded away by oil drilling, ORV use, and other activities. [Utah Wilderness Association]

**28.21 RESPONSE:** The oil and gas potential has been re-evaluated. The f3 rating is considered to be correct; however, the c4 rating has been changed to c1 and the text has been revised in the Final EIS.

**28.22 COMMENT:** The Alton coal field illustrates many of the problems inherent in developing southern Utah coal. Part of this field was designated unsuitable for strip mining by the U.S. Office of Surface Mining, owing to severe environmental constraints, including adverse impacts on visual resources, hydrologic impacts, and difficult revegetation. The latter problem is significant; Federal law prohibits surface coal mining in areas where native vegetation communities cannot be re-established and maintained. Throughout southern Utah, but particularly in the severe climates and thin soils of wildland areas, revegetation may well be a fantasy. [Utah Wilderness Coalition]

**28.22 RESPONSE:** See the response to Specific Comment 26.27.

**28.23 COMMENT:** It is asserted that the All Wilderness Alternative would have a negative impact on wildlife because water is limiting for wildlife and wildlife would be negatively impacted by the prevention of 1,000 acres of land treatments. This assertion does not consider wildlife in the broad sense. [Scott Mills]

**28.23 RESPONSE:** Although 300 acres of vegetation treatment for livestock are proposed in the WSA, certain wildlife species also would benefit from the removal of pinyon-juniper woodland and the establishment of additional edge effect. Precluding this project would be considered a negative effect to the wildlife habitat enhancement opportunities. No projects specifically for wildlife are proposed for the Death Ridge WSA. See the responses to General Comments 16.7 and 16.12.

**28.24 COMMENT:** For visual resources, the Class B scenic quality area was again downgraded to Class IV VRM classification. [Owen Severance]

**28.24 RESPONSE:** See the response to Specific Comment 26.42.

**28.25 COMMENT:** For solitude and primitive recreation, refer to the comments on the Burning Hills WSA. Coal wins again. [Owen Severance]

**28.25 RESPONSE:** See the response to Specific Comment 27.26.

**28.26 COMMENT:** The assessment of wilderness values is wrong. [Utah Wilderness Association, Utah Wilderness Coalition, Kim Jennyson, et al.]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 28: DEATH RIDGE WSA (CONTINUED)**

a. As with many of the Kaiparowits units, BLM's claim that 50 percent of the WSA lacks outstanding opportunities for solitude bares no resemblance to reality. One could spend days in virtually any part of the WSA and never encounter another person. You might see a few vehicles on some distant road but that is hardly enough to claim the area lacks solitude. Solitude has to be judged on some measure of reality and how an area is likely to be used. Anyone who has ever visited the Death Ridge area knows solitude is easy to find. To claim otherwise is a clear indication one has not been in the area.

b. Continually BLM analyzes solitude according to the amount of vegetative and topographic screening. The definition for solitude does not even consider these qualities, yet BLM continues to eliminate entire units because of this. The entire unit qualifies, as it is an unfrequented place and offers outstanding opportunities for solitude. Outstanding opportunities for primitive recreation include: backpacking, dayhiking, drawing, and exploring for fossils in the Wahweap formation or exploring for prehistoric Indian sites. Such subjective analysis of this WSA (and others) demonstrates BLM's inability to accurately qualify these lands and report to Congress on them.

c. The analysis of wilderness values in the Death Ridge SSA was extremely faulty. BLM has corrected the assessment to find that a majority of the area has the highest kind of solitude. This is supported by the evidence that the area itself has and the document presents.

d. BLM erroneously concludes that opportunities for solitude or primitive recreation are less than outstanding on 50 percent of the WSA. The Death Ridge WSA has an abundance of opportunities for both solitude and primitive recreation as the following description illustrates. Trap Canyon, Paradise Canyon, Right Hand Collet Canyon, and the narrow ridges between provide topographic screening for solitude and outstanding hiking opportunities in the upper part of the WSA. Dense pinyon-juniper forests on the ridges, trees, and shrubs in the canyons add to the areas solitude. In much of the rest of the WSA are both the Escalante and Paradise Canyon drainages. These canyons provide for extended backpacking excursions, and on the ridges between one experiences an incredible feeling of Kaiparowits vastness. The size of the unit and the immense wilderness surroundings of 3/4 million acres are overwhelming. Day hiking, backpacking, sci-

entific study, photography, camping, and sightseeing opportunities are all outstanding.

**28.26 RESPONSE:** The assessment of the wilderness values of naturalness, solitude, and primitive recreation was done by BLM field personnel familiar with the on-the-ground conditions. The EIS contains pertinent information on wilderness values, scenic resources, and recreation opportunities. Also, see the responses to Specific Comments 26.47 and 26.51.

**28.27 COMMENT:** To claim "There is no outstanding opportunity for primitive and unconfined recreation present in the WSA," as does the EIS, is absurd. The EIS attempts to justify this statement by saying hiking "is not superior to other hiking opportunities in the region." Does an area have to be "superior to" the Escalante or Fifty Mile Mtn. to satisfy the primitive recreation requirements of BLM? The antiwilderness bias in the Death Ridge analysis is all too obvious. [Utah Wilderness Association]

**28.27 RESPONSE:** See the responses to Specific Comments 26.47 and 26.51.

**28.28 COMMENT:** The attempts to downplay the area's wilderness values go on. The Draft EIS recognizes the existence of two Federally listed sensitive species, Penstemon atwoodii and Xylorhiza cronquistii. The Draft EIS also notes the area contains fossiliferous beds with gastropods, pelecypods, petrified wood, and dinosaur bones. Why then, given the knowledge of sensitive species and fossil beds, does the Draft EIS go on to state, "No scientific values were identified within the WSA." Such statements bring into question the credibility of decisions in the entire Kaiparowits region. [Utah Wilderness Association]

**28.28 RESPONSE:** For the Final EIS the sentence in question has been deleted and the text has been revised to note the scientific values inherent in sensitive species and fossils.

**28.29 COMMENT:** BLM claims that future transportation corridors pose conflicts with wilderness designation. In many cases large areas are deleted to accommodate such corridors. BLM provides no maps describing the location of the proposed corridors for any of the wilderness study areas involved. In the case of Mud Springs, BLM claims a "future rail or coal slurry pipeline" would cross the area. BLM stated that the "Kaiparowits Coal Development and Transportation Study for Southern Utah" describes the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 28: DEATH RIDGE WSA (CONTINUED)**

proposal. The consultant who prepared this document offers only general conceptual ideas which describe broad areas where corridors may be proposed. The conceptual corridors are up to 15 miles wide and six alternate routes are described. BLM uses this as the sole justification for deleting large parts or all of wilderness study areas from wilderness study. There are several problems with what BLM is proposing. The first is giving a consultant's report the status and weight of a land use plan. The report has not gone through the planning process nor had an EIS prepared on it. It has not complied with BLM's procedures for the designation and management of rights-of-ways. The public has had no opportunity for participation. For these reasons, this document cannot be considered a land use planning document and should be subject to general comments from the public. A utility corridor 15 miles wide is an absurdity. It represents nothing more than the effort by interested parties to keep every option open; that is understandable. What is difficult to understand is BLM's use of such a "wish list" as a serious proposal sufficient to disqualify an area for wilderness. BLM has demonstrated no need for these corridors. There has been no justification for any--much less all--of these provided to the public. BLM's decision to use the corridors as real conflicts is arbitrary. It is not supported by BLM's planning process. BLM falsely states the potential for corridor designation and the amount of land the corridor would occupy. BLM should apply each of the required criteria when considering transportation corridors (43 CFR 2806.1) in the wilderness study. We ask that BLM describe how the criteria have been used as well as which have not been used. A majority of the corridors proposed could be served with existing rights-of-ways. BLM fails to describe the current rights-of-way, their present use, their capacity, and the feasibility of using them for additional facilities. Common sense requires such an evaluation. We recommend that BLM drop transportation corridors as a wilderness conflict in the EIS unless the analysis described above is performed. To be fair, BLM must give equal weight to wilderness values and to proposals for commercial uses. Apparently pre-existing development proposals were given precedence. [Utah Wilderness Coalition]

**28.29 RESPONSE:** See the response to Specific Comment 26.10.

**28.30 COMMENT:** As a utility certificated and franchised to serve in the State of Utah, UP&L must meet its responsibility of planning and building for the pub-

lic's future electrical needs. Economically, it is more advantageous to build a mine-mouth generating plant, as located in Emery County. However, in order to develop the coal in its Kaiparowits coal field lease, it may be necessary to transport the coal to a less environmentally sensitive area to generate electricity. UP&L has worked with railroad engineers to develop a viable and feasible transportation route, avoiding serious impact on the WSAs included in BLM's Proposed Action alternative. The proposed railroad routes from the Kaiparowits coal field mines to be developed by UP&L would cross and substantially impact WSAs 27 (Burning Hills) and 28 (Death Ridge), as well as cross the southern tip of WSA 26 (Wahweap) and adjoin the western boundary of WSA 25 (The Cockscomb). A map of UP&L proposed rail route is included with these comments. [Utah Power and Light]

**28.30 RESPONSE:** See the response to Specific Comment 26.37. The Final EIS does note the presence of potential energy corridors in the WSA.

**28.31 COMMENT:** Transportation to the markets in the southwest can be accomplished by truck to rail sites and thence to market. The truck haul is somewhat longer than the 85-mile haul to the railroad presently made in Central Utah from Salina Canyon to Levan. Although this seems potentially a large cost, this truck haul serves to reduce the rail haul to the Southwest by 200 miles and equates to a cost saving, not an extra expense. Costs per ton mile for rail vs. trucks over short hauls have been narrowing for years. When this trend will level off cannot be predicted. However, under present costs coal can be moved from Kaiparowits to southwestern markets at costs comparable with coal from Central Utah. [AMCA]

**28.31 RESPONSE:** See the response to Specific Comment 26.30.

**28.32 COMMENT:** The preliminary recommendation is noted to be consistent with land use plans for Kane and Garfield Counties. Those counties have adopted policies against wilderness designations anywhere at any time. Under those circumstances, BLM's consistency or inconsistency with county plans can hardly be taken seriously as a factor or issue. [Utah Wilderness Coalition]

**28.32 RESPONSE:** See the response to Specific Comment 25.23. BLM does take county master plans

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 28: DEATH RIDGE WSA (CONTINUED)**

seriously as they have been prepared by locally elected officials and represent the views of the majority of the county residents. It should be noted that the Garfield County Master Plan recommends over 100,000 acres for wilderness designation.

**28.33 COMMENT:** A minimum of 75 well paid jobs would be required for a start-up mine and the benefits on the surrounding communities would be substantial. The share of Federal royalty going to State institutions would be significant and, as State leases were opened up, larger sums per ton of production would be available to education through the State Division of Lands and Forestry. We believe that State and local officials should speak for themselves, but without question the well being of the region would be permanently damaged by the continued inclusion of Wahweap, Burning Hills, Death Ridge, and Mud Springs Canyon in the Wilderness Study program. [AMCA]

**28.33 RESPONSE:** See the response to Specific Comment 26.54.

**28.34 COMMENT:** The State receives 50 percent of the royalty from coal mined from Federal leases and this money is distributed to various governmental, community, and educational bodies for public purposes. Locking up this income from coal would have a wide effect by crippling the State's ability to aid communities all over the State and impact the operating income of the Board of Regents, the Utah Department of Education, and the State's reclamation program. [AMCA]

**28.34 RESPONSE:** See the response to Specific Comment 26.55.

**28.35 COMMENT:** The EIS claims the size of the WSA is 9 miles by 8 miles when the correct size is 15 miles by 7 miles. [Owen Severance]

**28.35 RESPONSE:** The text has been corrected to show the size of the WSA as 17 miles long (north to south) and 9 miles wide (east to west).

**28.36 COMMENT:** Pages 1 and 16 correctly mention State in-holding acreage of 3,840 acres (approximately). [State of Utah]

**28.36 RESPONSE:** The text has been revised to show 3,841.24 acres of in-held State lands and 796.96 acres of split-estate lands (Federal surface and State minerals).

**28.37 COMMENT:** The discovery (exploration) phase of a 1,500-ton  $U_3O_8$  ore body would probably require surface disturbance well in excess of the 250-acre extent indicated. The 250-acre figure could represent the disturbed acreage during the actual production stage. In reality, present and near-term postulated economics will require grades greater than .01 percent  $U_3O_8$ , reducing the size of potential ore bodies while increasing the amount of area disturbed during discovery. [State of Utah]

**28.37 RESPONSE:** BLM does not project exploration or development in the foreseeable future because a significant resource is not known to occur in the WSA.

**28.38 COMMENT:** The document contains a good statement on cultural resource values. [State of Utah]

**28.38 RESPONSE:** The comment is noted.

**SECTION 29**  
**PHIPPS-DEATH HOLLOW ISA**

**29.1 COMMENT:** Although we understand the technical rationale for splitting the Escalante area into five separate ISAs and WSAs, the analysis should consider these areas as a complex of tracts that would preserve substantially all of the Escalante drainage stretching from the proposed Forest Service WSA on the Aquarius Plateau to the Glen Canyon NRA and the confluences with the Colorado River. [Neal Berg]

**29.1 RESPONSE:** The separate ISAs and WSAs were identified as a result of the inventory criteria. ISAs were based on former special management areas and WSA boundaries generally were based on land ownership patterns and developments such as roads. Factors are set forth in the "Wilderness Inventory Handbook" (BLM, 1978). A cluster of WSAs in the Escalante region is included on a Statewide basis in several of the Statewide alternatives in Volume I. Adjoining FS lands were designated the Box-Death Hollow Wilderness by the Utah Wilderness Act of 1984.

**29.2 COMMENT:** The wilderness proposal boundary in Sections 17 and 18 of the same township (T. 35 S., R. 4 E.) should follow the rim of the spectacular side canyon instead of legal subdivision lines. My Modified

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

Partial Wilderness proposal includes more of the spectacular ISA and provides a more manageable boundary than BLM's Proposed Action. [Owen Severance]

**29.2 RESPONSE:** The suggested boundary adjustment would add about 150 acres of public land and about 320 acres of State land to the partial alternative. The suggestion has not been incorporated because the 150-acre area would not substantially add to the wilderness values of the Proposed Action and the addition of the State land would not be consistent with Interior Department policy. See the response to Specific Comment 26.2.

**29.3 COMMENT:** My only suggestion would be to add the small hollow in the southeast portion of the ISA to the proposal as it is a natural part of this roadless area and seems to have been subject to the arbitrary "straight lining" boundary making of the cartographer rather than following natural contours or scenic features. [Michael Van Note]

**29.3 RESPONSE:** It is assumed that the small hollow referenced in the comment is the same 150-acre area identified in the preceding comment. See the response to Specific Comment 29.2.

**29.4 COMMENT:** BLM recommended only part of the natural qualifying lands around the Phipps-Death Hollow Outstanding Natural Area. BLM failed to include areas to the south up to the first significant impact, a powerline. We request a copy of the document BLM used to support the decision to drop this area from designation to be included in response to these comments. This area we are asking be reconsidered is natural and has no significant impacts. In several cases in the eastern part of the area, it possesses the same rugged slickrock terrain that is characteristic of the ISA. The western part of the southern parcel is covered with a juniper forest and has grass lands important for wildlife. This area is an important component of the whole ecosystem in this area and needs to be retained in the study process. BLM incorrectly chose to place the boundary on section lines up to 1 mile from the last human impact. The inventory policy requires that all natural areas be included for study. [Utah Wilderness Coalition]

**29.4 RESPONSE:** Concerning establishment of the ISA boundary, see the response to General Comment 3.1. Concerning the proposal to omit part of the ISA from the BLM Proposed Action, see the rationale in Appendix 11 in Volume I of the Final EIS.

**29.5 COMMENT:** A State School section (T. 35 S., R. 4 E., sec. 16) is not on the list of State land to be exchanged and it should be since it contains part of the Escalante River. [Owen Severance]

**29.5 RESPONSE:** The State section in question is outside of the ISA boundary.

**29.6 COMMENT:** Under this alternative, four State sections are identified for possible exchange and two other State sections would likely not be exchanged. However, these specific sections are not identified so it is impossible to know which sections fall in which category. [Rex and Judy Wells]

**29.6 RESPONSE:** In the Final EIS, none of the State sections are proposed to be exchanged as a result of a change in position by the State of Utah. See the revised narrative in Volume I regarding State in-holdings and adjacent sections. Also, see the response to General Comment 6.3.

**29.7 COMMENT:** With the Phipps-Death Hollow ISA complex proposal, no reason is given for the exclusion of the parcels along the south rim of the Escalante River Canyon. This seems to contrast with the handling of the northeast section of the tract where the Garfield County Commissioners have explicitly cited the possible expansion of the old Boulder airport as justification for deleting the area from consideration. Is there a significant and overriding reason for the exclusion along the southern boundary of the ISA? [Neal Berg]

**29.7 RESPONSE:** The areas along the south rim of the river canyon were judged by BLM to lack outstanding opportunities for solitude and primitive recreation.

**29.8 COMMENT:** The Draft EIS stated the reasons for the Partial Wilderness Alternative is to analyze as wilderness that portion of the WSA with the most outstanding wilderness characteristics. The conclusion that the omitted areas lack either solitude or recreation value is based upon an undocumented process and has been implemented arbitrarily. For example, the portion of the unit being deleted just north of Highway 123 east of the radio transponder, is rugged slickrock canyons cliffs and mesas. It has all of the same characteristics as lands which BLM is proposing to designate located on the north side of the river. To comply with the study policy, BLM should remove this rating system from the wilderness

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

recommendations. No conflicts with all wilderness designation are described. There are no good reasons for not recommending all wilderness. [Utah Wilderness Coalition]

**29.8 RESPONSE:** See the response to General Comment 22.3. Reasons for not proposing the All Wilderness Alternative are included in Appendix 11 in Volume I of the Final EIS.

**29.9 COMMENT:** The nonrecommended portion of the ISA does not differ substantially in any way from the recommended portion, visually or in degree of naturalness. ORV use is almost nonexistent, grazing would not be affected and there are no proposed developments in the nonrecommended portion. [Utah Wilderness Association]

**29.9 RESPONSE:** BLM believes that the areas not proposed along the northeast and southern edges do differ from the central part of the ISA. See Appendix 11 in Volume I.

**29.10 COMMENT:** The Partial Wilderness Alternative (Proposed Action) unnecessarily eliminates too much of the ISA. About 1400 acres of the ISA are excluded for possible expansion of the Boulder airport (and UFO landing site). Most of this acreage is steep sandstone canyon walls and is not even remotely usable for airport expansion. A 240-acre exclusion is more than adequate. About 640 acres of spectacular slickrock in the southeast corner of the ISA is excluded for no plausible reason. This corner of the ISA has some of the most spectacular views in all of the Escalante drainage. [Owen Severance]

**29.10 RESPONSE:** See the responses to Specific Comments 29.2, 29.7, and 29.8.

**29.11 COMMENT:** I don't like the southern boundary of your partial wilderness at all. The southern boundary of the All Wilderness Alternative is much better. Your proposal draws in too near the river and at one point actually cuts into the Escalante Canyon proper. I can, however, support the exclusion of the land on the northeast corner of the ISA to allow for development of the Boulder airport. There aren't many good landing sites around there, and there is no need here not to accommodate the interests of the local community. [Robert Hassell]

**29.11 RESPONSE:** The southern boundary of the Partial Wilderness Alternative follows the same line

as the existing Outstanding Natural Area boundary. The location which cuts across the river is a section of State land which is outside of the ISA.

**29.12 COMMENT:** The only serious quarrel I have with your proposal is the square of State land you are omitting along the jeep trail off the Boulder airport. I can understand cherry-stemming in the jeep trail if you must, but deliberately leaving out this square from your wilderness proposal will cause you many headaches should this section pass into Federal ownership at some later date. Having a section of nonwilderness land accessible by vehicle in the heart of a wilderness is simply unacceptable. You should put this section of State land in as wilderness. The effect at present will be nil, but when, and if, the land later passes to Federal ownership it will be wilderness without the necessity of further Congressional action. The same could be said about the section of State land along the northern border at "Sulphur Springs" and the section along the southern boundary near "radio facility." Both should go inside the wilderness boundary. [Robert Hassell]

**29.12 RESPONSE:** The wilderness review process is directed by Federal law and applies only to Federal lands. Lands not in Federal ownership at present could not be designated by Congress as part of the National Wilderness Preservation System.

**29.13 COMMENT:** The conflicts with the proposed Boulder airport are overstated. [John Veranth and Rex and Judy Wells]

a. The Draft EIS states the Partial Wilderness Alternative was also developed "to eliminate resource conflicts." Other than a brief mention of expansion of the Boulder airstrip, no other resource conflicts are identified that would necessitate any reduction of the ISA. The deletion of the large area identified on Map 3 is indefensible. First of all, area for expansion of the airstrip is available to the north and east, outside of the ISA, but this does not appear to have been considered. Much of the area proposed for deletion is unsuitable for an airstrip because of the topography and this deletion would, in effect, create a buffer zone which is in violation of the Wilderness Study Policy (page 5108). The All Wilderness Alternative does not mention that preclusion of this airstrip would have any effects. Since these effects are not mentioned, we assume they would be insignificant. The amount of aircraft use on the type of airstrip which can be expected to be developed for a

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

town the size of Boulder (less than or possibly equal to the size of the existing Escalante airfield) does not warrant deletion of this area and any use would have an insignificant impact on wilderness values within the ISA. Although we support the All Wilderness Alternative, we would not object to a very minor boundary adjustment near the Boulder airstrip to allow some minor relocation or widening if necessary. This adjustment should be limited to a maximum distance of 100 yards from the existing airstrip and its access road. However, before deleting any portion of this ISA it should be determined that any expansion is not possible outside of the ISA. The proposed southern boundary adjustment is also not justifiable. The only rationale we could find for this adjustment was that Garfield County's position is that this boundary should be adjusted to conform to the boundary of the ONA. Again no re-source conflicts could be found in the Draft EIS that support the county's position or the deletion of this area. In fact, portions of this area are within the viewshed of the Escalante River and should be included in the suitable portion. We would also like to note that both areas contain wilderness values and identified special features such as portions of the Boulder Mail Trail, Old Boulder Road, Boynton Road, and the original Escalante-Boulder telephone line.

b. The potential conflict of expanding the Boulder airstrip can be best accommodated by a minor boundary adjustment in Section 4. The partial alternative deletes far more land than required. Much of the deleted area is interrupted by cliffs and is unsuitable for an airfield.

**29.13 RESPONSE:** The area in question is influenced by two cherry-stemmed roads, the existing airstrip, the future need for airport expansion, and the proximity of low flying aircraft. All of these factors are considered in determining the BLM Proposed Action. The determination is based on conflicts with other uses and lack of outstanding wilderness characteristics, not on provision of a buffer zone.

**29.14 COMMENT:** UP&L is very concerned also about the effect of air quality restrictions from wilderness areas in the vicinity of its existing Hunter and Huntington plants located in Emery County. The table below lists the WSAs that are in close proximity to the Hunter and Huntington plants. These WSAs and their future affect on UP&L's operations should be considered for each alternative. [Utah Power and Light]

WSA	Name	Distance	
		From Hunter	From Huntington
62	Devil's Canyon	21 S	32 S
63	Sids Mountain	10 SE	20 SE
64	Mexican Mountain	23 SE	30 SE
61	Muddy Creek	34 S	43 S
60	Crack Canyon	41 SE	52 SE
59	San Rafael Reef	31 SE	42 SE
65	Jack Canyon	58 NE	54 NE
66	Desolation Canyon	39 ENE	41 ENE
67	Turtle Canyon	40 ENE	40 ENE
68	Floy Canyon	54 ESE	56 WSA
29	Phipps-Death Hollow	98 SSW	111 SSW
31	No. Escalante Canyon	86 SSW	97 SSW
30	Steep Creek	89 SSW	100 SSW

**29.14 RESPONSE:** Wilderness designation of Phipps-Death Hollow would have no affect on air quality operations at the Hunter and Huntington powerplants.

**29.15 COMMENT:** This ISA is an important transitional zone between Ponderosa and pinyon-juniper forests. It represents a diverse biological community that has been exceptionally well preserved. Over the years, numerous citizens have fought against proposed CO<sub>2</sub> well fields on nearby Antone Ridge. Wilderness designation of this ISA will help protect the region from extensive and destructive development. All chaining in this area should not be considered. Instead, BLM should use proposed chaining funds for similar projects in less sensitive areas. [Sierra Club, Cache Group]

**29.15 RESPONSE:** The EIS indicates that no chaining is anticipated in this ISA.

**29.16 COMMENT:** These WSAs have riparian habitat. The impacts of the alternatives on this habitat are not analyzed. [Scott Mills]

**29.16 RESPONSE:** The Vegetation section of the EIS describes the riparian habitat present in the ISA. This section is not carried forward into the impact analysis because it is not considered a significant issue affected by wilderness designation or nondesignation. Riparian values would be protected with management measures with each of the alternatives, in accordance with Executive Orders 11988 and 11990, and subsequent policies.

**29.17 COMMENT:** UP&L has water rights and pending applications relevant to the following listed wilderness study areas (WSAs): WSAs 29 (Phipps-Death Hollow ISA), 30 (Steep Creek), and 31 (North Escalante Canyons/The Gulch ISA). UP&L has pending

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

water rights in the Escalante River basin for future steam electric plant development. Rights amount to 165,000-acre feet and 29,555 cfs for power, mining, domestic, and irrigation use. [Utah Power and Light]

**29.17 RESPONSE:** Additional narrative on water rights and uses has been provided in the Final EIS.

**29.18 COMMENT:** It appears that no existing Reclamation projects would be affected, but two Reclamation projects that have been the subject of past studies would be precluded by wilderness designation. These are the Gray Mountain and Escalante projects. The wilderness study areas affecting the Gray Mountain project are No. 65 (Jack Canyon), No. 66 (Desolation Canyon), and No. 67 (Turtle Canyon). The wilderness study areas affecting the Escalante project are No. 29 (Phipps-Death Hollow ISA), No. 30 (Steep Creek), and No. 31 (North Escalante Canyons/The Gulch ISA). Project planning on the impacted projects has not been active for many years and will, most probably, remain inactive in the foreseeable future. [Bureau of Reclamation]

**29.18 RESPONSE:** Upon personal communication with the Bureau of Reclamation in September 1988, it was determined that the Escalante and Gray Mountain projects are still inactive and it is unlikely that they would ever be activated. In addition, there have been no reclamation withdrawals for the Escalante project. Reclamation withdrawals for the Gray Mountain project were revoked in March 1982. Therefore, these projects are not considered in the Final EIS.

**29.19 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**29.19 RESPONSE:** See the response to General Comment 14.27.

**29.20 COMMENT:** The discussion of mining claims in this alternative does not include the required validity examinations (Wilderness Management Policy page 26). [Rex and Judy Wells]

This EIS describes the anticipated surface disturbance from the development of valid mining claims. It fails to mention that a mineral examination of a claim is required prior to approving a plan of operation to verify whether or not the claim is valid. This examination must confirm that minerals had been found and the evidence is such that the deposit would be economical to development under the "prudent man test". The Draft EIS admits that economic considerations (e.g., transportation, low potential, etc.) are unfavorable, therefore, it is doubtful that any claim could qualify as a valid claim and plans of operation would be denied.

**29.20 RESPONSE:** See the response to General Comment 15.28.

**29.21 COMMENT:** We do not believe that presentation of a worst-case analysis is appropriate for mineral development in the No Action Alternative. Based upon the low potentials for oil and gas and uranium, we believe the most likely situation would be no development of these resources and that the worst-case analysis is misleading and gives the impression of a conflict that does not really exist. Our statement is supported by the description of potentials in the Affected Environment section and statements under the All Wilderness Alternative impact section that there is a low likelihood of exploration and development activities for oil and gas and that it is unlikely that exploration and development for uranium will occur. Therefore, we think the worst-case situation, including the impacts to all other resources, should be deleted and the analysis should be based on the expected lack of future development. [Rex and Judy Wells]

**29.21 RESPONSE:** The Final EIS has been revised to replace the "worst-case" analysis with a No Action/No Wilderness Alternative scenario based on assumptions for reasonably expected situations in the foreseeable future. See Appendix 6 in Volume I, and the responses to General Comments 9.10, 9.12, and 15.20.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

**29.22 COMMENT:** The Phipps-Death Hollow ISA, in conjunction with the adjacent Forest Service Box-Death Hollow Wilderness Area, comprises the headwaters of the Escalante River. It is a magnificent area of high desert, pinyon-juniper, and alpine ecosystems. The integrity of all of the proposed wilderness downstream depend on the continued protection of this important wilderness watershed. The recently released joint Forest Service/BLM Environmental Assessment for carbon dioxide development in this area is horrifying. New roads would have to be built, lands pulverized, water polluted, noise increased a thousand times, and industrial odors for miles. The EA admits that this development would destroy any chance of a wilderness experience in this area for all time! Box-Death Hollow is already designated as wilderness and Phipps-Death Hollow should be; but these areas will be destroyed forever if CO<sub>2</sub> development is allowed to occur. I strongly urge you to deny any CO<sub>2</sub> development requests in this area. I also ask that a full EIS be prepared to analyze the impacts these developments would have on these incomparable wilderness areas. [Scott Delong]

**29.22 RESPONSE:** An EIS for the proposed CO<sub>2</sub> leasing was prepared in both draft and final, entitled, "Environmental Impact Statement for Oil and Gas Leasing in the Escalante Known Geological Structure (KGS)" (Forest Service, 1988). Public comment for that specific action was obtained. A record of decision, addressing both National Forest and adjacent public lands administered by BLM, was issued in May 1988. That record of decision specifies new leasing with restrictive stipulations to protect or mitigate environmental values. In the above EIS, no new leasing is proposed for the Phipps-Death Hollow ISA.

**29.23 COMMENT:** I would also like to add a note of concern to support the wilderness designation for the Phipps-Death Hollow area, 43,000 acres, all of which should be wilderness. It is difficult to believe that the commercial viability of carbon dioxide production from nearby rocks can possible be sustained. This seems to me most likely a false issue raised by various resource exploitative companies strictly for the purpose of restricting wilderness designation there. [Charles Bagley]

**29.23 RESPONSE:** The likelihood of CO<sub>2</sub> production is addressed in the assumed Action Scenario for the No Action/No Wilderness Alternative and in the narrative describing the mineral resources.

**29.24 COMMENT:** Phipps-Death Hollow ISA is considered to have high wilderness values and moderate conflicts compared with WSAs in this part of the region. This WSA is part of the Escalante River system and has long been recognized for its outstanding wilderness values. There are, however, conflicts with potential CO<sub>2</sub> resources. Fairly recent discoveries of CO<sub>2</sub> in the area indicate significant development potential which would conflict with the Proposed Action. Further assessment of the CO<sub>2</sub> and oil and gas resource potential is necessary before this conflict can be adequately characterized and a mitigation solution recommended. Additionally, the 100-yard offset in this restricted topography should allow for future bridge work where SR-12 crosses the Escalante River. [State of Utah]

**29.24 RESPONSE:** See the responses to Specific Comments 29.22 and 29.23. Future bridge work on SR-12 would not be affected by wilderness designation unless major realignments into the wilderness were to be proposed.

**29.25 COMMENT:** One issue of concern is CO<sub>2</sub>. BLM notes in the Draft EIS that the KGS has been drawn larger than the structure but then continues on to speculate that the ISA can only be considered presumably productive. Since the WSA is found at the southern tip of the KGS and outside the closed structure, this can not be presumed at all. In fact, Congress recognized this fact and included the portion of the KGS just north of the ISA in the Box-Death Hollow Wilderness. Given this and the fact there is little likelihood CO<sub>2</sub> will ever be developed in this area, potential for mineral development is low. [Utah Wilderness Association]

**29.25 RESPONSE:** See the responses to Specific Comment 29.22 and 29.23. The geologic structure does extend into the Phipps-Death Hollow ISA. However, detailed explorations are not sufficiently complete to ascertain precisely how far south in the ISA the structure and the gas reservoir exist.

**29.26 COMMENT:** I object to the proposed CO<sub>2</sub> development in the Box-Death Hollow Wilderness and the adjoining Phipps-Death Hollow ISA. When the U.S. Congress passed the enabling legislation for the Box-Death Hollow Wilderness, I am sure that they did not foresee or endorse the total destruction of that area for a relatively unimportant and common gas. The EA for these areas makes perfectly clear that is exactly



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

what CO<sub>2</sub> development would do to these overwhelmingly spectacular and peaceful areas. [Marlena Delong]

**29.26 RESPONSE:** The EIS referred to in the response to Specific Comment 29.22 addresses environmental impacts and mitigation measures associated with proposed CO<sub>2</sub> development adjacent to the Phipps-Death Hollow ISA.

**29.27 COMMENT:** The Draft EIS states that "available mineral investigation reports by the USDI, Geological Survey and Bureau of Mines will be reviewed by BLM prior to making final wilderness recommendations" and that, "The SAI (1982) report will be used as the reference on oil and gas potential for this EIS." Since the USGS/USBM report has been completed for this area, is referenced in the bibliography (Weir and Lane, 1981), and is the official report required by FLPMA, it should be used for all mineral potential information. [Rex and Judy Wells]

**29.27 RESPONSE:** The USGS/USBM report was used for this ISA, inasmuch as it was available. Phipps-Death Hollow was one of four ISAs in Utah with early USGS/USBM reports. The SAI material also provided pertinent information. The Final EIS includes information from both documents, as well as more current information, particularly on CO<sub>2</sub>. It is not known if USGS/USBM will issue an updated version of their report. If they do, then the sentence referred to in the comment still would apply, relative to any new information in the document.

**29.28 COMMENT:** It is stated that 10 of the 33 oil and gas leases (8,400 acres) in the ISA are pre-FLPMA. Since these leases will have to expire before or on 10/21/86 unless held by production, the number and acreage of pre-FLPMA leases will have to be revised in the Final EIS. This will also change the total acreage under lease since no new leasing can occur in WSAs. [Rex and Judy Wells]

**29.28 RESPONSE:** Lease information has been updated for the Final EIS. There currently are 3,225 acres leased with the ISA. These leases are pre-FLPMA and are still in effect because they were placed in a suspended status as of March 1, 1978. This resulted from a drilling moratorium in effect on the Forest Service and BLM Wilderness Study Areas.

**29.29 COMMENT:** The limitations placed on potential surface-disturbing activities do not include 7,700

acres currently under a no surface occupancy stipulation. The impacts from mineral development described in this section show the fallacy of using a worst-case analysis. It is stated there would be a significant loss of wilderness value throughout the WSA as a whole if roads, vehicular ways, and drill pads are located throughout the area. Approximately 90 percent of the acreage that would be disturbed in the worst-case analysis is related to oil and gas development and, according to this section, this disturbance would be throughout the entire ISA. Yet 40,031 acres of the WSA or 94 percent is either closed to leasing or under a no surface occupancy stipulation which would prevent these developments from occurring. If a worst-case analysis would be used, it should at least be limited to those areas where impacts could occur (2,700 acres in this ISA). [Rex and Judy Wells]

**29.29 RESPONSE:** The minerals information and related analysis has been revised in the Final EIS. For the No Action/No Wilderness Alternative, it is assumed that up to 310 acres could be disturbed from exploration and development of oil, gas, and/or carbon dioxide. The leasing stipulations are reflected in the analysis assumptions. Also, see the response to Specific Comment 29.21.

**29.30 COMMENT:** There are very few mammals or birds that can survive in the desert even though they are specialized for desert habitat. They must have aquatic habitats. The wilderness proposal sets aside many of them. Some of the ones that I am familiar with that would be important are Canaan Mountain and Orderville Canyon WSAs, and North Escalante Canyon/The Gulch and Phipps-Death Hollow ISAs. [Alice Lindahl]

**29.30 RESPONSE:** The presence of riparian and aquatic habitats in the Phipps-Death Hollow ISA is recognized in the EIS.

**29.31 COMMENT:** BLM lists the number of raptors present in the ISA. The specific species should be listed and accompanied by brief descriptions of particular habitat requirements. [Scott Mills]

**29.31 RESPONSE:** See the response to Specific Comment 26.39.

**29.32 COMMENT:** There are significantly higher numbers of deer using the area during winter than the Draft EIS states. [State of Utah]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

**29.32 RESPONSE:** The EIS indicates that deer numbers are "low" and no numerical figures are given. The information is based on UDWR deer herd unit data and personal knowledge of BLM field biologists.

**29.33 COMMENT:** Are there any wild horses or burros present? [Brian Wood]

**29.33 RESPONSE:** Wild horses or burros do not inhabit the Phipps-Death Hollow ISA.

**29.34 COMMENT:** The EIS states wildlife could be affected by improved livestock distribution because of the proposed fences. However, the effects are not explained nor is it stated whether these affects would be positive or negative. [Rex and Judy Wells]

**29.34 RESPONSE:** The sentence in question has been removed. The fences would help to control livestock but would have little effect on wildlife.

**29.35 COMMENT:** The discussion on forest products states that noncommercial gathering of dead-and-down wood would be allowed. The Wilderness Management Policy (Page 17) states that trees, shrubs, and other vegetative products will not be sold or cut for nonwilderness purposes, except for valid mining claims and under emergency conditions. Fuel woodcutting for campsites or cooking fires may be permitted, but harvest of wood for other purposes, such as home heating, could not be allowed. [Rex and Judy Wells]

**29.35 RESPONSE:** The intent of the statement in the EIS would be to allow gathering of dead-and-down wood for campfires by wilderness hikers, backpackers, and campers. The wording has been clarified.

**29.36 COMMENT:** The Socioeconomics discussion on proposed improvements for livestock states these improvements would be foregone under this alternative, along with any resulting increase in ranchers' income and that no such potential range improvements have been proposed. This is inconsistent with the Livestock section which states new rangeland improvements would be allowed if determined necessary for the purpose of rangeland and/or wilderness protection criteria. [Rex and Judy Wells]

**29.36 RESPONSE:** The analysis has been revised and the inconsistency has been corrected. No income-producing livestock projects have been proposed for this area. Should the area be designated as wilderness, any new projects that may be proposed in the

future would have to be consistent with guidelines as reproduced in Appendix 1 of Volume I of the Draft EIS.

**29.37 COMMENT:** We do not understand why the average actual livestock use and the revenues generated from grazing in the WSA are unknown. Permittees are required to submit actual use figures to BLM and are billed accordingly. [Rex and Judy Wells]

**29.37 RESPONSE:** Livestock use and fee data are compiled for each allotment, and allotment boundaries do not coincide with ISA boundaries. The allotment data has been pro-rated for EIS purposes to estimate use in the ISA, but actual use and related billing are done by allotment and not by ISA.

**29.38 COMMENT:** The discussion of ORV use would allow "occasional and short-term vehicular access approved by BLM for maintenance of approved range land developments." This wording implies that ORV use would be allowed for any maintenance. Although the Wilderness Management Policy does allow this type of use, it also states that this should be allowed "where practical alternatives do not exist" and that motorized equipment need not be allowed "where such activities can reasonably and practically be accomplished on horseback or foot." [Rex and Judy Wells]

**29.38 RESPONSE:** The wording in question is not intended to imply that vehicle access would be approved for all maintenance. The sentence provides a brief overview of the situation without repeating the longer language which is contained in Appendix 1 of Volume I.

**29.39 COMMENT:** The Colorado Plateau has the finest desert scenery, and in greater abundance than any other place in the entire nation---and probably the world. People travel from all over the world to visit these incredibly scenic and remote lands. The plateau contains seven national parks and numerous national monuments. In this land of superlatives, the Escalante River canyons are the most spectacular, the most beautiful, the most fun, the most popular and the most famous. The Escalante is the best of the best! These canyons receive international acclaim for their beauty, solitude, and unsurpassed recreation opportunities. These canyons are proven recreational assets, proven tourist attractions, and proven (and undisputed) wilderness. Yet your agency is willing to sacrifice large chunks of Utah's prime wilderness jewel for an ephemeral short-term economic gain. I am shocked and appalled! [Scott Delong]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

**29.39 RESPONSE:** The scenic attributes of the Phipps-Death Hollow ISA and related areas are recognized in the EIS. See Appendix 11 for a summary of rationale for the Proposed Action alternative.

**29.40 COMMENT:** The Cultural Resources section states there could be a potential of increased vandalism to cultural resources due to increased recreational use. However, the potential for vandalism exists whether or not the ISA is designated. [Rex and Judy Wells]

**29.40 RESPONSE:** It is true that vandalism may occur with or without wilderness. See the response to General Comment 20.1.

**29.41 COMMENT:** The Boulder Mail Trail is not mentioned as being nominated to the National Register of Historic Places in the Cultural Resources section, although it is referenced as such on page 20. [Rex and Judy Wells]

**29.41 RESPONSE:** The trail has been added to the Cultural Resources narrative in the Final EIS.

**29.42 COMMENT:** The statement in the Recreation section regarding 43 miles of hiking routes is incorrect. I can measure that many miles counting only three drainages. Many other routes are possible which include travel in the slickrock between drainages and which include use of side canyons and minor drainages. [John Veranth]

**29.42 RESPONSE:** The comment is correct. The figure of 43 miles represented the trails in the main drainages. The text has been revised.

**29.43 COMMENT:** The entire Scorpion, Steep Creek, and Phipps-Death Hollow area WSAs should be included. I have hiked these areas in all four seasons, and the entire areas are natural and have outstanding opportunities for solitude and primitive recreation, and niggling back the boundaries to the "most-most-outstanding" area violates wilderness study policy. [Jay Lepreau]

**29.43 RESPONSE:** Focus of the Proposed Action on areas with outstanding wilderness characteristics and consideration of other land uses do not violate the wilderness study policy. See the responses to General Comments 2.13 and 22.5.

**29.44 COMMENT:** Not all hiking routes are associated entirely with the major drainages. The Boulder Mail Trail and the Boynton Road also provide outstanding travel routes. The fact that the Boulder Mail Trail is becoming a popular backpacking route is referenced on page 20. [Rex and Judy Wells]

**29.44 RESPONSE:** See the responses to Specific Comments 29.41 and 29.42.

**29.45 COMMENT:** The Dixie National Forest concurs with the proposed wilderness in areas 29 and 30 and also with the recommendation to not propose wilderness in areas 12, 22, 23, 24, and 32. The following are comments on the Draft EIS Volume III, Part B, regarding the Phipps-Death Hollow ISA.

There is no trailhead at the top of Death Hollow. Hikers are presently parking along the Hells Backbone Road and making their way down through Death Hollow. This is dangerous as there are steep talus slopes and cliffs to make their way over. Under solitude, the document states that 16 percent of the area is along streams. It is likely that 95 percent of the use will take place along the streams. Will the capacity of the area be based on the area along the streams, or is there a plan to disperse the users? For the No Action/No Wilderness Alternative, the development of oil and gas inside Phipps-Death Hollow would effect the existing Box-Death Hollow Wilderness as access would likely occur across the Box-Death Hollow Wilderness. [U.S. Forest Service, Intermountain Region]

**29.45 RESPONSE:** There is a sign indicating parking for the beginning of the Death Hollow hike, and a sign with an arrow indicating the general direction of Death Hollow. The sign says no established trail, no water for 11 miles, and 29 miles to Highway 12. Future trailhead development may be constructed.

The dangerous nature of the hike is correctly stated. After designation, a detailed wilderness management plan would address use of stream area and any need to disperse visitor use.

The interrelationship of the Forest Service Box-Death Hollow Wilderness and BLM Phipps-Death Hollow ISA is described in the EIS.

**29.46 COMMENT:** We disagree that the opportunity for solitude on Slickrock Saddle Bench above Slickrock Saddle diminishes toward the Dixie National

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

Forest boundary. This area has sufficient topographical relief and vegetative screening to provide outstanding opportunity for solitude. Furthermore, most recreational use is channeled into the canyon bottoms and visitor encounters on the benches are rare. [Rex and Judy Wells]

**29.46 RESPONSE:** The determination of outstanding solitude is based on the judgment of BLM field people familiar with the ISA. See the response to Specific Comment 26.47.

**29.47 COMMENT:** BLM's assessment of opportunities for solitude is wrong. [Kim Jennyson and Owen Severance]

a. The WSA is characterized by steep walled canyons, mesa, plateaus, natural bridges, and arches. Entrenched canyons in colorful red and white sandstone are quite common. Outstanding opportunities for solitude exist throughout the WSA. BLM has again used the improper definition of solitude and has wrongly claimed that 6,731 acres do not meet the wilderness requirements for solitude. Inadequate vegetative and topographic screening should not be used to eliminate qualified areas. Primitive opportunities, including backpacking, horseback riding, sightseeing, drawing, and photographing are outstanding throughout the area. I don't understand why drawing and photographing are outstanding throughout the area. I don't understand why 5,391 acres do not meet the requirements for primitive and unconfined recreation.

b. I disagree with the statement that 6,731 acres of the ISA lack outstanding opportunities for solitude. Most of the area in question is covered with pinyon-juniper which does provide outstanding opportunities for solitude. I also disagree with the statement that 5,931 acres lack outstanding opportunities for primitive recreation. Much of this area is either spectacular slickrock or rim areas overlooking the spectacular slickrock wilderness. The opportunities for hiking, sightseeing, and backpacking are outstanding.

**29.47 RESPONSE:** See the responses to General Comments 2.12, 22.3, and 22.5, and Specific Comment 29.46.

**29.48 COMMENT:** The Escalante-Boulder telephone line is identified as an imprint of man that affects the naturalness. This telephone line is also identified as a cultural resource and is a special feature. We do not believe that a cultural resource should be identified

as an imprint of man affecting naturalness. [Rex and Judy Wells]

**29.48 RESPONSE:** The telephone has been deleted as an imprint of man in the Final EIS.

**29.49 COMMENT:** The consistency of this alternative with the potential for wild and scenic river designation is not discussed nor are the impacts of this alternative on that potential designation. This discussion is also not included in the other alternatives. [Rex and Judy Wells]

**29.49 RESPONSE:** Discussion on the status of the Escalante River in relation to the Wild and Scenic Rivers Act is included in the sections on recreation and land use plans. BLM's current land use plan (MFP) states that BLM would not seek wild and scenic river designation, but would make appropriate consultations on any projects that may be proposed. Formal study of the river as to wild and scenic river designation will be done as part of the next BLM land use planning (RMP) effort, scheduled to be complete in 1998. Wilderness review and wild river studies are separate and distinct actions mandated by different laws.

**29.50 COMMENT:** It is stated the No Action Alternative is based upon implementation of the current BLM Escalante MFP and is therefore in conformance with it. This implies the All Wilderness and Partial Wilderness Alternatives would not be consistent with the MFP. This is misleading because wilderness was purposely not included in the MFP due to the upcoming wilderness review process. Furthermore, since no significant resource conflicts have been identified and management would be essentially the same as described in the MFP, we believe all alternatives would be in conformance with the MFP. [Rex and Judy Wells]

**29.50 RESPONSE:** Wilderness designation by Congress would constitute an amendment to the existing BLM land use plan. BLM does not have authority to designate wilderness, whereas BLM does have authority for other multiple use actions in accordance with the land use plan.

**29.51 COMMENT:** This map should show the boundary of the adjacent Box-Death Hollow Wilderness. [Rex and Judy Wells]

**29.51 RESPONSE:** The relationship of BLM WSAs and wilderness areas of other agencies is shown on Pocket Map 2 in Volume 1.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 29: PHIPPS-DEATH HOLLOW ISA (CONTINUED)**

**29.52 COMMENT:** Page 14, Carbon Dioxide: More information should be supplied on the CO<sub>2</sub> resource. Useful information would answer such questions as, (1) is the resource contained in one reservoir or are there smaller discrete reservoirs; (2) how does the low pressure of the resource affect its economic viability; and (3) how does the regional hydrodynamic drive affect the resource location and volume estimates? [State of Utah]

**29.52 RESPONSE:** Existing information on the CO<sub>2</sub> resource is limited and complete response to the questions raised here is not possible. However, some additional information has been added to the Final EIS.

**29.53 COMMENT:** The low rating for locatable minerals seems reasonable. [State of Utah]

**29.53 RESPONSE:** There are no known deposits of locatable minerals in the ISA.

**SECTION 30**  
**STEEP CREEK WSA**

**30.1 COMMENT:** In the initial inventory BLM proposed to intensively inventory the whole unit for wilderness study. The initial inventory decision, however, reduced the unit from 33,923 acres to 24,764 acres. The deletion was based upon "significant intrusions" in the eastern part of the unit. These intrusions amount to approximately 10 miles of two-track ways most of which are now untravelable. Some of these ways were improved or constructed after the passage of FLPMA. In the intensive inventory 2,537 acres of the eastern part of the unit was removed for the same reasons. The main reason for this deletion was to allow mining exploration without interim management protection requirements. This exploration for uranium occurs in the Chinle Formation found in the portions of the unit dropped from wilderness study. BLM deleted natural areas from wilderness study. In the eastern part of the unit BLM deleted acreage which has no human impacts. The vehicle way BLM described in its intensive inventory is not evident on the ground. We request that BLM correct these inventory problems. [Utah Wilderness Coalition]

**30.1 RESPONSE:** See the response to General Comment 3.1.

**30.2 COMMENT:** Although we understand the technical rationale for splitting the Escalante Area into 5 separate ISAs and WSAs, the analysis should consider these areas as a complex of tracts that would preserve substantially all of the Escalante drainage stretching from the proposed Forest Service WSA on the Aquarius Plateau to the Glen Canyon NRA and the confluences with the Colorado River. [Neal Berg]

**30.2 RESPONSE:** See the response to Specific Comment 29.1.

**30.3 COMMENT:** The Burr Trail setback is unnecessary. [Utah Wilderness Association and Jay Lepreau]

a. In the WSAs bordering the Burr Trail (North Escalante/The Gulch, Steep Creek), a 1/4-mile setback is proposed for potential Burr Trail realignment and paving. This is wildly excessive and will invite terrible visual pollution of the currently spectacular drive along the Burr Trail, and will invite ORV abuse of the WSAs by allowing initial penetration. A 0.5-mile corridor is totally unnecessary, and the paving current proposal require much less of a corridor, for it proposes essentially no realignment along most of the road. One-half mile would eliminate many of the spectacular areas closely bordering the road, such as the Hogback. The normal 100-foot allowance for vehicle turn around, etc., is certainly sufficient along the road.

b. Creating a 1/4-mile setback is unneeded for a very narrow canyon like Long Canyon. That would put the wilderness boundary even back from the canyon rim.

**30.3 RESPONSE:** See the response to General Comment 3.32.

**30.4 COMMENT:** To facilitate Garfield County in developing a paved highway and utility corridor along the southern boundary of Steep Creek WSA, BLM is deleting 2,555 acres along the Burr Trail. Most of the corridor proposed by BLM would include spectacular slickrock canyon walls. The southern boundary of Steep Creek passed through Long Canyon. The boundary road abuts the several hundred foot canyon wall. Expansion of the road beyond the canyon wall is not possible. Because of the limitations of the rugged rock formation expansion of this dirt road is impossible in a majority of the 2,555 acres BLM proposed including in this corridor. Adequate provision for utility corridors can be made immediately next to the

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 30: STEEP CREEK WSA (CONTINUED)

present road by minor deletions. [Utah Wilderness Coalition]

**30.4 RESPONSE:** See the response to General Comment 3.32.

**30.5 COMMENT:** By deleting the areas adjacent to the Burr Trail, BLM is tacitly giving its approval to potential highway and powerline corridor intrusions which would drastically alter the naturalness and solitude of the areas. The paving of the Burr Trail is controversial, and does not have Statewide public support. The road will probably never be paved because of public outrage and the extremely high construction costs relative to projected use. Therefore, there is no reason to delete the acreages adjacent to the Burr Trail. [Martin Barth]

**30.5 RESPONSE:** The Environmental Assessment for the Burr Trail road project and the Wilderness EIS both conclude that paving the road would not result in substantial impacts to wilderness values. Garfield County has an established right-of-way for the road and the county expects eventually to pave the road.

**30.6 COMMENT:** The Proposed Action unnecessarily provides a 1/2-mile wide road corridor along the Burr Trail for possible realignment. There is no mention of this in the Draft EIS and it is unnecessary since there won't be any realignment of the road. The setback even includes Long Canyon which is less than 1/8 mile wide. [Owen Severance]

**30.6 RESPONSE:** The Draft EIS did mention the road corridor and possible road realignment. Also, see the response to General Comment 3.32.

**30.7 COMMENT:** Trail realignment appears highly unlikely because of Congressional opposition. At most, some improvements such as a good gravel surface and concrete stream crossings are the only improvements that will be undertaken. There is, therefore, no need to exclude areas along the road, since no realignment will occur. Wilderness designation of the areas next to the road will inhibit further ORV damage which is now occurring. [Jack Spence]

**30.7 RESPONSE:** See the response to Specific Comment 30.5. ORV use along much of the Burr Trail road is not possible due to terrain limitations. A few scattered spots and segments of the easterly portion of the road are susceptible to ORV use; however, these

locations for the most part are not within the WSAs or ISAs.

**30.8 COMMENT:** It is gratifying to see that BLM has recognized the unique and outstanding character of the Steep Creek area and recommended it for wilderness designation. I would suggest that the original boundary of the WSA along the Long Canyon portion of the Burr Trail road be retained or at least maintained near the stream bed in order to protect the scenic portions of Long Canyon for the relatively large number of sightseers using the Burr Trail road. These walls are also well suited for easily accessible rock climbing, the many joints in the sandstone offering extremely challenging "jamcracks" on very vertical walls. I also see no reason to eliminate the northeast portions of the Gulch from the proposal. This seems to be another case of cartographic paralysis. One might also add that while this WSA like the Phipps-Death Hollow ISA is suitable for wilderness designation by itself, its adjacentness to the North Escalante Canyons/The Gulch ISA is an enhancement. [Michael Van Note]

**30.8 RESPONSE:** Road improvements would enhance the scenic values of the route by reducing wash-outs and/or airborne dust conditions. Neither wilderness or nonwilderness would affect rock-climbing opportunities in Long Canyon.

**30.9 COMMENT:** Much more than 1,920 acres of State land should be exchanged. [State of Utah]

**30.9 RESPONSE:** See the revised narrative on State land in-holdings in Volume I, Chapter 1.

**30.10 COMMENT:** The northeast part of the WSA was left out of the proposal because of speculative uranium values, even though, ". . . no uranium deposits are known to occur within the WSA." [Michael Salamacha]

**30.10 RESPONSE:** Portions of the WSA are rated favorable for uranium exploration. The most likely locations for occurrence of uranium are in the northeast part of the WSA. For the EIS analysis, it is assumed that extraction of uranium would not occur in the WSA in the foreseeable future. The northeast portion of the WSA is included in BLM's revised Proposed Action.

**30.11 COMMENT:** Areas should not be deleted from the Proposed Action because of mining claims. [Utah

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 30: STEEP CREEK WSA (CONTINUED)**

Wilderness Coalition, Michael Van Note, and Owen Severance]

a. Areas BLM claims have "low quality wilderness values" would be removed from the unit (2,654 acres). Unfortunately, areas BLM claims have high quality wilderness (1,130 acres which contain uranium claims) are also being deleted. The sole rationale for dropping the southeast corner of the unit is BLM's contention that this area possesses "low wilderness characteristics."

b. It is a mistake to eliminate the eastern portion of this ISA despite the presence of mining claims. First of all, these claims cover only a very small area of that portion of the ISA. Secondly, the boundaries appear to be quite arbitrary and cartographically convenient rather than based on the presence or lack of mining claims, wilderness features, or opportunities for solitude and recreation. I am sure that a more intelligent approach to wilderness boundaries can be made than simply following section lines, etc. In view of the outstanding opportunities for wilderness recreation, solitude, etc., in the eliminated area; opportunities which are outstanding in regional, national, and I believe an international sense; I feel that most of this area should be reincluded in BLM wilderness recommendation. By leaving out this area the integrity of the Escalante wildlands is severely compromised.

c. The northeast part of the WSA was left out of the proposal because of speculative uranium values, even though "no uranium deposits are known to occur within the WSA." The southwest part of the WSA is left out of the proposal by incorrectly claiming that the area has neither outstanding opportunities for solitude nor outstanding opportunities for primitive recreation. This area does have adequate relief and vegetation to meet the solitude standard. In addition, the opportunities for primitive recreation include hiking, rock climbing, photography, and sightseeing. These opportunities are outstanding. The land on the other side of the Burr Trail is proposed for wilderness, so there is no reason to exclude land in the southwest part of the WSA. BLM should change its Proposed Action to All Wilderness.

**30.11 RESPONSE:** The rationale for the BLM Proposed Action is given in Appendix 11 of the Final EIS. Also see the response to Specific Comment 30.10.

**30.12 COMMENT:** The Colorado Plateau has the finest desert scenery, and in greater abundance, than any other place in the entire nation---and probably the world. People travel from all over the world to visit these incredibly scenic and remote lands. The plateau contains seven national parks and numerous national monuments. In this land of superlatives the Escalante River canyons are the most spectacular, the most beautiful, the most fun, the most popular, and the most famous. The Escalante is the best of the best! These canyons are internationally acclaimed for their beauty, solitude, and unsurpassed recreation opportunities. These canyons are proven recreational assets, proven tourist attractions, and proven (and undisputed) wilderness. Yet your agency is willing to sacrifice large chunks of Utah's prime wilderness jewel for an ephemeral short-term economic gain. I am shocked and appalled! [Scott Delong]

**30.12 RESPONSE:** The scenic attributes of the Steep Creek WSA and related areas are recognized in the EIS. See Appendix 11 in Volume I for a summary of the Proposed Action alternative.

**30.13 COMMENT:** The treatment of the Steep Canyon WSA in the Draft EIS is most perplexing. Although it is identified as being unsuitable for manageability as a unit (Vol. I, Table 4, P.21), absolutely no manageability conflicts are cited anywhere in the Draft EIS. Furthermore, the section of the WSA bounding the Circle Cliffs in the Upper Gulch and Egg Canyon is proposed for deletion despite the observation that "this is one of the most spectacular and distinctive landscapes in the Colorado Plateau" (Vol. III-B, Page 19). No reason is given for this exclusion. Similarly no reason is given to justify the deletion of the Deer Creek area near the southwestern boundary of the WSA. The exclusion of this area seems uncorrelated with the adjustment to the southern boundary of the WSA to accommodate the proposed realignment of the Burr Trail, and the deletion of the area west of Deer Creek Ranch conveniently ignores the proposed boundary for the Escalante Canyons North/The Gulch ISA Complex which would encircle this area on the other side of the Burr Trail, thereby surrounding it with designated wilderness. [Neal Berg]

**30.13 RESPONSE:** The unit is manageable. The Manageability Alternative has been deleted from the Volume I Statewide analysis. Reasons for the BLM Proposed Action are summarized in Appendix 11 in Volume I. The BLM Proposed Action in the Draft EIS has been increased by 2,456 acres to include the Deer

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 30: STEEP CREEK WSA (CONTINUED)**

Creek area near the southern boundary of the WSA (east of the private Deer Creek area) and the north-eastern corner of the WSA. The area west of the Deer Creek Ranch is separated from the North Escalante Canyon/The Gulch ISA Complex by a public road; therefore the two units are not contiguous.

**30.14 COMMENT:** According to the EIS, the objective of the Partial Wilderness Alternative is "to analyze as wilderness that portion of the WSA with the most outstanding characteristics and to minimize conflicts with areas of greatest mineral development potential and the Burr Trail realignment in Long Canyon." A close look at the acreage dropped from wilderness belies this statement. The largest piece dropped is in the southwest corner of the WSA, where no uranium is said to occur. This area contains a "500-foot slickrock mesa" but ironically, is not considered to possess outstanding wilderness qualities even though other isolated benches according to BLM possess outstanding wilderness values. [Utah Wilderness Association]

**30.14 RESPONSE:** BLM has determined that the southwest corner of the WSA does not have outstanding opportunities for solitude and primitive recreation. See the response to Specific Comment 28.26.

**30.15 COMMENT:** UP&L is very concerned also about the effect of air quality restrictions from wilderness areas in the vicinity of its existing Hunter and Huntington plants located in Emery County. The table below lists the WSAs that are in close proximity to the Hunter and Huntington plants. These WSAs and their future affect on UP&L's operations should be considered for each alternative. [Utah Power and Light]

WSA	Name	Distance	Distance
		From Hunter	From Huntington
62	Devil's Canyon	21 S	32 S
63	Sids Mountain	10 SE	20 SE
64	Mexican Mountain	23 SE	30 SE
61	Muddy Creek	34 S	43 S
60	Crack Canyon	41 SE	52 SE
59	San Rafael Reef	31 SE	42 SE
65	Jack Canyon	58 NE	54 NE
66	Desolation Canyon	39 ENE	41 ENE
67	Turtle Canyon	40 ENE	40 ENE
68	Floy Canyon	54 ESE	56 WSA
29	Phipps-Death Hollow	98 SSW	111 SSW
31	No. Escalante Canyon	86 SSW	97 SSW
30	Steep Creek	89 SSW	100 SSW

**30.15 RESPONSE:** Wilderness designation of the Steep Creek WSA would have no affect on the two powerplants. See the responses to General Comments 10.1 and 10.3.

**30.16 COMMENT:** The southwest portion of the WSA is described by BLM as "a 500-foot mesa surrounded by an open flat." This statement is biased and false. The 700-foot mesa dissected on all sides is Navajo sandstone; has steep slickrock slopes with hundred of Ponderosa pine; has Anasazi sites throughout; has beautiful erosional features; spectacular views of the surrounding canyonlands; and no open flats other than historic homestead to the north west next to Boulder. [Grant Johnson]

**30.16 RESPONSE:** The wording has been changed to more clearly describe the area in question.

**30.17 COMMENT:** I disagree with your reasons for not recommending lower Hot Canyon. The EIS states that "in lower Hot Canyon drainage the Navajo sandstone disappears and Hot Canyon loses its entrenchment. The landscape is relatively undifferentiated with little relief, a moderate pinyon juniper overstory, and sandy soils. The opportunity for solitude is lacking in this area." The fact is Hot Canyon's entrenchment is the Kayenta and Upper Windgate Formations and loses its entrenchment as it enters the Navajo just where your wilderness recommendation ends. [Grant Johnson]

**30.17 RESPONSE:** The portion of lower Hot Canyon in the WSA not included in the Draft EIS Proposed Action now has been included in the revised Partial Alternative proposed in the Final EIS.

**30.18 COMMENT:** Five springs exist in the unit. BLM has not performed the necessary inventories for rare and endangered species, archeological resources, wildlife, and recreation. [Utah Wilderness Coalition]

**30.18 RESPONSE:** See the responses to Specific Comment 26.39 and General Comments 9.6, 13.1, 13.8, 16.3, 20.2, and 22.4.

**30.19 COMMENT:** These WSAs have riparian habitat. The impacts of the alternatives on this habitat are not analyzed. [Scott Mills]

**30.19 RESPONSE:** See the response to Specific Comment 29.16.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 30: STEEP CREEK WSA (CONTINUED)**

**30.20 COMMENT:** UP&L has water rights and pending applications relevant to the following listed Wilderness Study Areas (WSAs): WSAs 29 (Phipps-Death Hollow ISA Complex), 30 (Steep Creek), and 31 (North Escalante Canyons/The Gulch ISA Complex). UP&L has pending water rights in the Escalante River basin for future steam electric plant development. Rights amount to 165,000-acre feet and 29,555 CFS for power, mining, domestic and irrigation use. [Utah Power and Light]

**30.20 RESPONSE:** Additional narrative on water rights and uses has been provided in the Final EIS.

**30.21 COMMENT:** BLM describes the management of uranium claims in the wilderness area as a problem. No explanation of why this is a problem is given. BLM does not describe any legal constraints that prevent management protecting the wilderness values of these areas. Inadequate information on the status of these claims is given. While notice of assessment work is filed each year on these claims, no physical evidence exists indicating each of the more than 800 claims has had \$100 work performed on them. BLM concludes that these uranium claims of known marginal values are more important than the high wilderness values BLM admits exist on these claims. [Utah Wilderness Coalition]

**30.21 RESPONSE:** Information on the number of mining claims has been updated for the Final EIS. The presence of mining claims creates certain rights for mineral development. The various aspects of wilderness management relative to mining claims are described in Appendix 1 in Volume I. Also, see the response to General Comment 1.13.

**30.22 COMMENT:** The phrase "any potential deposit would not be expected to exceed 500 tons uranium oxide at a forward cost of \$100 dollars per ton" is confusing. Does this mean that there is potential for a 500-ton resource in the area at a projected market price of \$100/per pound? [State of Utah]

**30.22 RESPONSE:** This sentence has been clarified to discuss only the estimated in-place resource expected to occur in the WSA.

**30.23 COMMENT:** Assessment for acreage disturbed by uranium production should be revised upward to reflect road and drill pad disturbance during exploration for hypothetical deposits. Overall the potential for single high-grade deposits (greater than 0.15 per-

cent  $U_3O_8$ ) of one million lb size is low. Copper associated with uranium at grades noted in the report cannot compete with other higher grade/tonnage deposits in the USA. [State of Utah]

**30.23 RESPONSE:** Analysis assumptions have been revised based on a thorough review of all minerals information. Uranium exploration but not production is now projected for the Steep Creek WSA. See Appendix 6 in Volume I.

**30.24 COMMENT:** Areas containing pre-FLPMA mining claims on 1,130 acres would be deleted. BLM claims that these are management problems. These claims for uranium are on unproven claims which DOE claims "have a low favorability rating and may not be further explored." To support the deletion from the wilderness recommendation of these mining claims, BLM misrepresents the mineral analysis performed by DOE and others. Uranium deposits are found to be limited to the Shinarump Conglomerate found on the lowest band in the Chinle Formation. BLM admits that uranium deposits "tend to be small and highly localized." The Mineral-Resource Evaluation of Wilderness Study Areas (prepared for BLM by Science Applications and the Oak Ridge National Laboratory) concludes that small deposits of this type are economical to extract only when exposed in outcrops or when closely grouped. Extensive exploration (some illegal) has been performed on the small Shinarump outcrops and no economic deposits near the surface have been found. The DOE study rates this uranium deposit f2/c4 (minor deposits based upon abundant direct evidence). BLM without any supporting information states that these uranium deposits "must be considered as having a relatively high potential for small economic uranium deposits." The portions of the WSA recommended to be deleted because of mining claims exceeds the size of the Shinarump outcrops. This area also contains special wilderness features including "large unbroken logs of petrified wood." [Utah Wilderness Coalition]

**30.24 RESPONSE:** See the responses to Specific Comments 30.21 and 30.23.

**30.25 COMMENT:** The WSA is better suited for elk habitat improvement than wilderness. [Tom Hatch and Guy Thompson]

a. On Steep Creek WSA, I recommend that in preference to wilderness designation, it be revegetated and set aside strictly as critical elk and deer and

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 30: STEEP CREEK WSA (CONTINUED)**

other wildlife winter range to avoid an inevitable conflict with the farming and ranching industry in the area. Under the present land use and wildlife management policies, wildlife herds are being increased on the Boulder Mountain. In the winter these wild animals now find their best grazing on winter cattle permit areas or in farmer's stack yards. To prevent this problem I recommend revegetating the entire section and other sections in the area, and other newly revegetated areas. This will leave Steep Creek strictly for wildlife which will avoid future conflict.

b. It is critical that some areas within the proposed wilderness areas -- particularly the Steep Creek area -- be developed as wintering areas for the large elk herds that have been introduced to the Boulder Mountain area and are currently wintering on agricultural land around the town of Boulder. Ample feed for this herd could be provided by reseeding and developing the range in this Steep Creek area, thereby avoiding conflicts with agricultural interests.

**30.25 RESPONSE:** There is a potential for land treatment to improve elk habitat for use during winters with heavy snowfall when elk migrate down into the WSA from the high country to the north. This situation is noted in the EIS. Land treatments for elk are not proposed at this time.

**30.26 COMMENT:** The Utah Division of Wildlife Resources has proposed to BLM to stock elk in this area. Chukar are found in the WSA. [State of Utah]

**30.26 RESPONSE:** BLM is not aware of a proposal to stock elk in the Steep Creek WSA. BLM concurs that chukar are present and this is reported in the EIS.

**30.27 COMMENT:** The EIS description of raptors is inadequate. [Scott Mills and Utah Wilderness Association]

a. BLM lists the number of raptors present in the WSA. The specific species should be listed and accompanied by brief descriptions of particular habitat requirements.

b. There is no mention of the Draft EIS of the falcon pair found in Long Canyon. Why is there this omission?

**30.27 RESPONSE:** See the response to Specific Comment 26.39. A survey in May 1987 by BLM and

State representatives found no evidence of a peregrine falcon nesting site or peregrine presence in Long Canyon (USDI, BLM, 1980).

**30.28 COMMENT:** In BLM overlay maps in the Escalante office the lower Hot Canyon area deleted from your recommendation is shown as an area suitable for chaining. This is not mentioned in the EIS. [Grant Johnson]

**30.28 RESPONSE:** The MFP overlays in the Escalante BLM office do not identify Hot Canyon as suitable for chaining.

**30.29 COMMENT:** The Circle Cliffs allotment identifies 619 acres as suitable for grazing in the WSA and an AUM grazing preference of 1,530. This would equate to approximately 2.5 AUMs per acre. Without having any additional information, this would seem to be an unrealistic grazing allocation for this particular vegetation site. [State of Utah]

**30.29 RESPONSE:** Grazing preference cannot be equated to carrying capacity. Rather, it is a level of grazing privilege established after passage of the Taylor Grazing Act. The current authorized grazing level for the 3,341 acres of the Circle Cliffs allotment within the WSA is 95 AUMs.

**30.30 COMMENT:** The statement that the visual resource inventory classified "135,343 acres as exceptional (Class A)" seems to contradict special features, paragraph 5 which states, "The aggregate area of outstanding scenic values in the WSA is about 19,200 acres." Can there be 116,143 acres of "exceptional" scenery (Class A is defined as "unusual or outstanding") which do not have outstanding scenic value? [State of Utah]

**30.30 RESPONSE:** The WSA has 19,100 acres of Class A scenery. The EIS has been corrected in both the visual resources and special values paragraphs.

**30.31 COMMENT:** The EIS says that Lower Hot Canyon lacks scenic values right after saying that "The slickrock formations and the high percentage of exposed rock are the esthetic elements contributing to the valuable scenic resources in this section of the WSA." Lower Hot Canyon has just what you like in other sections. Lower Hot Canyon clearly qualifies as wilderness and should be included up to the Burr Trail. [Grant Johnson]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 30: STEEP CREEK WSA (CONTINUED)**

**30.31 RESPONSE:** See the response to Specific Comment 30.17.

**30.32 COMMENT:** Effects on cultural resources by development would not be minimal as stated. Past experience, i.e., Alkali Ridge, has shown development to be disastrous to cultural sites. [State of Utah]

**30.32 RESPONSE:** See the response to General Comment 20.1.

**30.33 COMMENT:** The EIS states that lower Hot Canyon does not possess outstanding opportunities for horseback riding and hiking. I spend much time in the area on horseback and foot and can testify that the area is richly scenic and has historic horse trails leading into Steep Creek in two places and into Cottonwood Canyon and into Deer Creek. [Grant Johnson]

**30.33 RESPONSE:** The EIS has been revised to include the horse trails. Also, see the response to Specific Comment 30.17.

**30.34 COMMENT:** We disagree with BLM's assessment that this area lacks opportunities for solitude and primitive recreation. During an April 1986 trip, several of our members found outstanding opportunities for primitive recreation in a natural setting with superb solitude. The entire WSA has spectacular scenery which contributes to the high quality natural setting. A large natural bridge would be best protected through wilderness designation. This WSA contains important wildlife habitat for elk and endangered peregrine falcons. [Sierra Club, Cache Group]

**30.34 RESPONSE:** See the responses to Specific Comments 30.14, 30.25, 30.26, and 30.27.

**30.35 COMMENT:** The use of rating systems in the analysis of wilderness values is inconsistent with the wilderness policy. In implementing this rating system BLM gives high ratings to areas that meet all the mandatory wilderness characteristics. In this case portions of the unit are deleted because BLM alleges that these portions don't possess all the mandatory wilderness characteristics. BLM has no written methodology for the application of their high-medium-low rating system. It is known that this rating system only considers part of the criteria given in the study policy for solitude and wilderness activities. Only areas with vegetative or topographic screening are considered to have wilderness-grade solitude opportunities. Wilderness activities are limited. Scientific study,

hunting, and many other activities are not considered in their rating system. There are serious inconsistencies in how this rating system is used. [Utah Wilderness Coalition]

**30.35 RESPONSE:** A "high-medium-low rating system" is not used. This was explained in response to comments 253 and 313 in the Draft EIS, Appendix 2, Volume I. Also, see the response to General Comment 22.3.

**30.36 COMMENT:** In the Affected Environment section of the Draft EIS for this area, there are contradictory statements concerning solitude. On page 17 the Draft EIS states, "The entire WSA can be considered to exhibit opportunities for solitude." However on the next page this same document says such opportunities are lacking in Hot Canyon and the mesa in the extreme southwestern section of the WSA. My experience of the area tends to agree with the former statement and I see no reason to exclude these areas from wilderness study. Also the Draft EIS states that the Circle Cliffs landscape type is "one of the most spectacular and distinctive on the Colorado plateau." Yet this section is also deleted from the wilderness recommendation because of uranium/copper mining claims. The 82 current claims can still be developed with proper consideration for wilderness values. [Jean Soko]

**30.36 RESPONSE:** The narrative on solitude has been revised to remove the inconsistencies. Also, see the response to Specific Comments 30.17 and 30.21.

**30.37 COMMENT:** The southwestern corner of the unit is claimed by BLM to only meet the naturalness criterion. This section of the unit has topographic features isolating the visitor from a nearby visitor. This portion of the unit contains archaeological values. The private landowners in Deer Creek are supporting wilderness designation of the land adjacent to their property. [Utah Wilderness Coalition]

**30.37 RESPONSE:** See the response to Specific Comment 30.14. Archaeological values may be considered as wilderness special features, but they do not constitute primary criteria for wilderness designation. Likewise, the support of adjacent private land owners is not a primary criteria.

**30.38 COMMENT:** This unit consists of long, deep, canyons separated by benches and is located about 3 miles from Boulder, Utah. The Draft EIS qualifies 71

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 30: STEEP CREEK WSA (CONTINUED)

percent of the unit for solitude as stated in Volume 1, pg 217. Again, BLM improperly defines solitude by requiring either vegetative or topographic screening. The entire unit meets the standards for outstanding opportunities for primitive and unconfined recreation. Primitive activities include: backpacking, hiking, horseback riding, photographing, sightseeing, drawing and rockhounding. [Kim Jennyson]

**30.38 RESPONSE:** BLM believes that solitude and opportunities for primitive recreation are outstanding in part of but not for the entire Steep Creek WSA. Also, see response to Specific Comments 26.47 and 26.51.

**30.39 COMMENT:** The entire Scorpion, Steep Creek, and Phipps-Death Hollow areas WSAs should be included. I have hiked these areas in all four seasons, and the entire areas are natural and have outstanding opportunities for solitude and primitive recreation, and niggling back the boundaries to the "most-most-outstanding" area violates wilderness study policy. [Jay Lepreau]

**30.39 RESPONSE:** Focusing on the best areas does not violate the wilderness study policy. BLM is mandated to provide recommendations for designation of selected areas where wilderness would be the most appropriate use of land and where the criteria for wilderness would be met. The agency is not mandated to recommend all areas which may have some degree of wilderness character. Also, see the responses to General Comments 2.13 and 22.5.

**30.40 COMMENT:** As nearly as I can determine from public input, in excess of 99 percent of the full-time residents of Garfield County are adamantly opposed to the designation of any wilderness within our county for any reason. The below listed units can not be supported by me as a Garfield County Commissioner for wilderness designation because the opportunities for primitive and unconfined recreation are less than outstanding due to a lack of diversity of recreational opportunity. These areas are simply geological formations which are common to the region. They are limited by either a lack of curiosity-arousing features or other unique or unusual features which would attract visitors, and their designation as wilderness would seriously limit future development of our County's mineral and geological resources. [Guy Thompson]

**30.40 RESPONSE:** The local views regarding wilderness are summarized in the Final EIS. BLM has identified many areas which do have outstanding opportunities for primitive recreation due to landform, vegetation, water, or other aspects of wilderness quality. Also, BLM has identified many locations within WSAs which do not have these recreational attributes. See the response to Specific Comment 30.38.

**30.41 COMMENT:** The Navajo sandstone canyon walls are 200 feet high with red cones and beautiful crossbedding. The canyon does open up, but for that reason there are many Anasazi camps with manos and metates and lithic areas. Below Hot Canyon east of Deer Creek 1/2 mile north of the Burr Trail are at least three room blocks. Surface indications are white squares (caliche floors) littered with basalt rocks from slumped walls. In front of the rooms are several mealing bins. The opportunities for solitude in this area are excellent both because of the relief, the bottom of Steep Creek to the bottom of Deer Creek is across a dissected bench, and because of a thick pinyon-juniper overstory. [Grant Johnson]

**30.41 RESPONSE:** The archaeological resources of the Steep Creek WSA are identified in the EIS.

**30.42 COMMENT:** It is interesting to note that BLM has deleted lands that join this WSA to neighboring NPS land and Forest Service land. It appears that this was done to facilitate potential tar sand development in the Circle Cliffs area. This area should be designated wilderness to provide important extensions to Capitol Reef National Park. [Sierra Club, Cache Group]

**30.42 RESPONSE:** The Steep Creek WSA does not adjoin lands administered by the National Park Service. The adjacent Forest Service-administered land to the north of the WSA was not designated in the Utah Wilderness Act of 1984. Therefore, wilderness designation of the Steep Creek WSA would have little direct relationship to Capitol Reef National Park, but would be compatible with management on the Dixie National Forest.

**30.43 COMMENT:** Steep Creek WSA is considered to have moderately high wilderness values and moderately low conflicts compared with other WSAs in this part of the region. Conflicts include potential uranium resources and the need to provide vegetation manipulation in a portion of the WSA to reduce the problem of elk descending off Boulder Mountain. The elk migrate through the WSA to graze on ranch lands in and

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 30: STEEP CREEK WSA (CONTINUED)

around the town of Boulder. BLM's proposed 18,500-acre partial alternative, with the exclusion of approximately 600 acres in the northwest corner of the WSA, would reduce many conflicts. Uranium potential needs further analysis. It is also recommended that the transportation corridor along the Burr Trail be sufficiently wide (at least 0.25 mile) to accommodate planned and/or future upgrading and maintenance. [State of Utah]

**30.43 RESPONSE:** See the responses to Specific Comments 30.23 and 30.25, and General Comment 3.32.

**30.44 COMMENT:** The Dixie National Forest concurs with the proposed wilderness in areas 29 and 30, and also with the recommendation to not propose wilderness in areas 12, 22, 23, 24, and 32. [U.S. Forest Service, Intermountain Region]

**30.44 RESPONSE:** The comment confirms that proposed wilderness in the Steep Creek WSA would be compatible with the management of the adjacent National Forest lands.

**30.45 COMMENT:** How can the Red Canyon hot spring be 48 miles southwest of Steep Creek and 60 miles east of the North Escalante Canyons, when Steep Creek is due north of the North Escalante Canyons? [Brian Wood]

**30.45 RESPONSE:** The reference to Red Canyon in the Steep Creek WSA analysis was in error and has been removed in the Final EIS.

## SECTION 31

### NORTH ESCALANTE CANYON/THE GULCH ISA

**31.1 COMMENT:** With respect to the various options under consideration here, we must realize that what this region represents is an organic whole. Simply drawing a line around the canyon drainages and in effect saying "this much and no more" will not do the job you intend and that which common sense demands. What BLM has here is a unique ecological and geological unit, all of which has, by some miracle, been preserved as wilderness. The mesas, benches, and canyons are all part of this wilderness fabric, each important in its own way to the wholeness that is so vital here. What needs preserving in this place is not so much a scenic resource, an ecological laboratory, or an island of serenity, but a precious combination of all these together

in one place. To allow some of this area to remain open to paving, drilling, chaining, or ORV use is to deprive the Escalante of its most precious asset--wholeness. [Robert Hassell]

**31.1 RESPONSE:** The concept of "wholeness" is not one of the criteria. Areas lacking wilderness qualities are not included.

**31.2 COMMENT:** The best way to define WSA boundaries would be to use topographic features where possible and use section lines only where there aren't any clearly defined topographic features. In the EIS, topographic boundaries are mainly used to reduce the area of WSAs from their sizes in the initial inventory. Examples are: the Spencer Flats area in the North Escalante Canyons/The Gulch ISA Partial Wilderness Alternative and the Road Canyon WSA Partial Wilderness Alternative. Examples of WSAs where topographic boundaries could have been used to enlarge the WSAs but weren't are: North Stansbury Mountains WSA, the Deep Creek Mountains WSA, and the Indian Creek WSA. [Owen Severance]

**31.2 RESPONSE:** ISAs were identified prior to the initial inventory. Also, see the response to General Comment 3.1.

**31.3 COMMENT:** A setback along the Burr Trail is unnecessary. [Robert Jenkins, Jay Lepreau, Owen Severance, and Rex and Judy Wells]

a. A 0.25 mile setback from the Burr Trail is excessively wide for improvement of the Burr Trail and a utility corridor, especially when combined with a similar setback in the Steep Creek WSA Partial Wilderness Alternative. In most places, the road is in the best possible, and sometimes only, location and minor realignment and widening would be possible with a smaller corridor. We believe the 100-foot setback identified in the All Wilderness Alternative combined with a similar setback in the Steep Creek WSA would be sufficient. Utilities, if ever developed, could be placed within this corridor.

b. The Proposed Action unnecessarily contains a 0.5-mile-wide road corridor for possible realignment of the Burr Trail. The road will not be realigned, so no setback is necessary. Besides, Long

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)**

Canyon is less than 0.125 mile wide so there is no way that the road could be moved 0.25 mile from its present location.

c. In the WSAs bordering the Burr Trail (North Escalante/The Gulch, Steep Creek), a 0.25-mile setback is proposed for potential Burr Trail realignment and paving. This is wildly excessive and will invite terrible visual pollution of the currently spectacular drive along the Burr Trail, and will invite ORV abuse of the WSAs by allowing initial penetration. A 0.5-mile corridor is totally unnecessary, and the paving current proposal require much less of a corridor, for it proposes essentially no realignment along most of the road. One-half mile would eliminate many of the spectacular areas closely bordering the road, such as the Hogback. The normal 100-foot allowance for vehicle turn around, etc., is certainly sufficient along the road.

d. It appears as though part of the impetus for the recommendation of less than all wilderness is the requirement for upgrading of the Burr Trail. I do not support paving of that road. However, I appreciate the need for a potential realignment of certain critical sections. My guess is that the 100-foot maximum setback that the All Wilderness Alternative would entail may not be adequate in some places. However, the 1,300-foot setback that the Partial Wilderness Alternative would permit amounts to a grossly unnecessary removal of key wilderness land. I would support a maximum setback of 300 feet.

e. The Burr Trail deletion (0.25 mile) should not be made. The existing corridor is wide enough (see Draft EIS Volume 1, page 32) and could be up to 300 feet from the centerline of the road. More than half of the distance of the Burr Trail along the ISA's boundary is within Long Canyon and a 0.25-mile setback is totally unnecessary since the canyon is very narrow and the road could not be "realigned" to anywhere else.

**31.3 RESPONSE:** See the response to General Comment 3.32.

**31.4 COMMENT:** BLM should propose the All Wilderness Alternative. [Rex and Judy Wells and Robert Hassell]

a. Although we support the All Wilderness Alternative, we would not object to some minor adjustments of the boundary in certain areas. Our recommended boundaries are shown on the attached map. We think our recommendation would allow development of the Burr Trail if

considered necessary and would also locate the boundary on easily recognizable features which would improve manageability.

b. The only sensible alternative is the All Wilderness Alternative. Chopping off Wolverine Bench, Bown Bench, and Little Bown Bench as a sacrifice to the uranium interests is not acceptable here, the utter folly of the second Partial Wilderness Alternative scarcely merits comment. The character of this country is such that here no compromises must be allowed. The study area should all be designated as wilderness, and even at that there are some improvements in the All Wilderness Alternative which must be made. First, put the State section in the Horse Canyon region inside the wilderness boundary. Second, close the jeep trail down Horse Canyon. It has no business being there at all, and it's like a knife pointed at the heart of the wilderness. I have no problem, however, with leaving a corridor along the Burr Trail road for possible improvement of the road and for utilities along it.

**31.4 RESPONSE:** BLM Proposed Action would be manageable as wilderness. The 91,558-acre Partial Wilderness Alternative reflects boundary changes which are believed to be desirable, to protect significant wilderness characteristics, to exclude areas which lack such characteristics, and to accommodate other needs. Wolverine Bench, Big Bown Bench, and Little Bown Bench are included in BLM's Proposed Action for wilderness in the Final EIS.

The State section is not subject to the wilderness review, as FLPMA applies only to Federal land. Even if the boundary did encompass the State section, it would not be part of the designated wilderness unless exchanged. Since the Draft EIS, the State has expressed general opposition to such exchanges. See the narrative on State in-holdings in Volume I of the Final EIS and the response to Specific Comment 26.2. The vehicle route in Horse Canyon is a maintained county road.

**31.5 COMMENT:** North Escalante Canyons ISA is considered to possess the highest of wilderness values due to the outstanding natural resources of the Escalante River system. It also has some significant resource conflicts, most notably livestock and minerals. Excluding the Circle Cliffs Favorable Uranium Area (DOE Report PGJ/F - 049 [82]) from the ISA could eliminate the most severe uranium

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)**

conflicts. The Environmental Consequences chart in the Draft EIS apparently is in error. It claims that BLM's proposed 100,300-acre partial alternative would allow recovery of 3,680 tons of uranium which underlies 31 percent of the WSA. The 100,300-acre partial only deletes about 16 percent of the ISA area so at least 1,800 tons of uranium would still be impacted. [State of Utah]

To reduce conflicts with livestock interests, the area south and west of Spencer Flats should be excluded from wilderness designation. Consideration should also be given to boundary changes along Horse Canyon and south of Boulder so the boundary would not follow the roads. Then livestock and minerals are reduced by the suggested boundary within the recommended area. The only exception are the cultural values. If those values are not protected by a wilderness designation, some other special management alternatives could be considered.

**31.5 RESPONSE:** Mineral values on the east side of the ISA have been re-evaluated and now are believed to be outweighed by wilderness values in the BLM Proposed Action. Wilderness designation would not significantly conflict with livestock use, except for three proposed reservoirs that would not be constructed. No vegetation treatments for livestock are proposed. Cultural values are protected by law, regardless of the land use designations.

**31.6 COMMENT:** In two areas BLM has cherry-stemmed a vehicle way which is neither a regularly and continuously used road nor a significant human impact. The vehicle way leading into an old exploratory well site on the "V" west of Harris Wash is most definitely not a "road." It is nearly impossible to drive even in four-wheel drive vehicles due to heavy erosion in transecting washbottoms and drifting sand which has entirely obliterated the road in places. This cherry-stem should be omitted, for it would create a development zone dangerously close to the spectacular "Volcano Peak" formation just 100 yards east of the old vehicle way. This formation is probably the single most unusual and important feature of erosional sculpting in the entire Escalante Canyon system, and to preserve its character, BLM must prohibit vehicular access. [Utah Wilderness Coalition]

BLM has also created an extraordinarily long cherry-stem down the canyon bottom of Horse Canyon, nearly all the way to the Escalante River. Yet there is virtually no visible track down the canyon bot-

tom, and if the area has ever been improved by mechanical means, it has been far more rapidly reclaimed by erosion--as is entirely natural in a canyon bottom. Use of the canyon bottom by four-wheel drive vehicles is extremely infrequent and would never qualify under BLM policy as "regular and continuous use." Therefore, to create a nonwilderness corridor down the length of this important side canyon is highly inappropriate.

**31.6 RESPONSE:** At the time of inventory, the route to the "V" met the criteria for a road. That road has been and currently is maintained by BLM. The "V" flat and the cherry-stem are outside of the proposed wilderness. The Volcano Peak formation is within the BLM 91,558-acre Proposed Action alternative.

The road in Horse Canyon has been and currently is maintained by Garfield County. BLM considers it to be an official county road, established under the same authority as the Burr Trail road. A cherry-stem is appropriate to accommodate wilderness designation of adjacent lands on both sides of the road.

**31.7 COMMENT:** BLM has omitted a large area in the center of Big Spencer Flats, claiming the area is crossed with a network of vehicle ways. We disagree. Our fieldwork indicates that such a network, if it exists at all, is so unnoticeable as to be impossible to locate on the ground, and we urge BLM to use a short cherry-stem on the access road rather than throwing the entire area open to development. To do so will create a major island of nonwilderness inside this exceptional wilderness area, and will furthermore invite endless management conflicts by leaving the boundary of the wilderness area poorly defined. The boundary should be located at the edge of the road, as specifically provided in Organic Act Directive 78-61, Change #2, page 5, which states: "When a boundary adjustment is made due to imprints of man, the boundary should be relocated on the physical edge of the imprint of man." [Utah Wilderness Coalition]

**31.7 RESPONSE:** See the response to General Comment 3.1.

**31.8 COMMENT:** The proposed cherry-stems should not be allowed. [Brett Jensen and Robert and Deanna Tubs]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

a. The cherry-stemmed corridors into the wilderness destroys the continuity of the unit and provides little access improvement for the area. Vehicle ways in Horse Canyon and the "V" should not be re-established and left to be reclaimed by nature.

b. Cherry-stemmed corridors in Horse Canyon, the "V," Harris Wash, and Big Spencer Flats are almost returned to a natural state. BLM should not allow corridors into wilderness areas as this causes management problems and degrades the entire area.

**31.8 RESPONSE:** The routes mentioned meet the criteria for roads. These existing roads disrupt the continuity of naturalness.

**31.9 COMMENT:** Little Death Hollow, Wolverine Canyon, and the surrounding benchlands should be included in any Escalante Canyon wilderness proposal. You should use a short cherry-stem in three locations: Horse Canyon, the "V" between Harris Wash and Escalante, and Big Spencer Flats. [Clifford Mitchell]

**31.9 RESPONSE:** Little Death Hollow, Wolverine Canyon, and the surrounding benchlands are included in the BLM Proposed Action in the Final EIS. The Horse Canyon road would be a cherry-stem. The "V" and Big Spencer Flats are excluded.

**31.10 COMMENT:** The handling of road corridors in the EIS has been inconsistent. For example, in the Grand Gulch ISA Complex a narrow road corridor was cherry-stemmed into the ISA in several places. In the Sids Mountain WSA, road corridors 1/3 of a mile wide (according to the map in Volume VI) were cherry-stemmed into the WSA. Narrow corridors such as those in the Grand Gulch ISA Complex should be used in all WSAs. In some WSAs, a "way" was used to limit the size of the WSA, while in other WSAs, similar "ways" were determined to be not significant and were included as wilderness. Examples of the former are the Westwater Canyon Partial Wilderness Alternative and the Partial Wilderness Alternative for the North Escalante Canyons/The Gulch ISA (the "way" in Horse Canyon is used to exclude a major part of the WSA). Examples of the latter are in the Grand Gulch ISA Complex: a "way" extends from Sheiks Flat to the rim of Bullet Canyon; another, in Polly's Pasture, goes to the head of the Government Trail. Both "ways" were treated as wilderness. If "ways" in all of the WSAs were handled like they were in the Grand Gulch ISA Complex, the size of many WSAs would be substantially increased. [Owen Severance]

**31.10 RESPONSE:** The Horse Canyon road is a cherry-stem and does not exclude any part of the ISA.

**31.11 COMMENT:** Acquisition of 6 of 13 State sections adjacent to the ISA is identified, but these sections are not identified so it is impossible to know which ones would be acquired. Also, there is no explanation as to why certain sections would be acquired and why others would not be acquired. [Rex and Judy Wells]

**31.11 RESPONSE:** Due to the change in policy by the State of Utah, the entire EIS material on State in-holdings and adjacent sections has been revised. See Volume I.

**31.12 COMMENT:** The 452 acres of split-estate are outside the ISA according to the maps. The 8,897 acres of in-holdings include 40 acres within the Glen Canyon NRA. [State of Utah]

**31.12 RESPONSE:** The text and maps have been revised to reflect current information on split-estate and in-held sections.

**31.13 COMMENT:** The State will amend the WSA Exchange List (Appendix 3 in Volume I) to include T. 35 S., R. 5 E., sec. 36, which BLM has identified correctly as an in-holding. The ISA boundary in the southeast includes two State sections which are usually excluded when the boundary is drawn. [State of Utah]

**31.13 RESPONSE:** See the response to Specific Comment 31.11. The maps have been revised to correct the boundary errors.

**31.14 COMMENT:** We cannot understand why this (100,300-acre partial) alternative was established when the objective is to "analyze as wilderness that portion of the ISA that would have the fewest conflicts with potential future mineral development." Information in the Affected Environment section and the USGS/USBM mineral report show that the mineral potential of the entire ISA is low and the impacts under the All Wilderness Alternative admit there would not be significant adverse effects on mineral development if the entire ISA would be designated. We believe a Partial Wilderness Alternative should be established only when a true resource conflict exists. [Rex and Judy Wells]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)**

**31.14 RESPONSE:** During formulation of the alternative, the southeastern part of the ISA was suggested to have a higher mineral potential than other parts of the ISA. On re-evaluation, this partial alternative has not been included in the Final EIS. A different partial alternative has been included which focuses on wilderness values. Partial alternatives may be identified for reasons other than resource conflicts. In some cases, partial alternatives are identified to portray areas which BLM believes have high wilderness values as compared to portions of WSAs which lack outstanding wilderness values. Alternatives are intended to afford a comparison of impacts.

**31.15 COMMENT:** The 19,000-acre deletion is unjustified. [Utah Wilderness Association, Utah Wilderness Coalition, Marlana Delong, and Gordon Swanson]

a. The Draft EIS acknowledges the exceptional wilderness values of the excluded 19,000 acres and points out that the areas included in the Proposed Action would add immeasurably to the wilderness. What is the rationale for dropping these?

b. I object to the deletion of a 19,000-acre piece of the North Escalante Canyons ISA. The deleted section contains some of the most beautiful and worthwhile lands in the entire Escalante drainage. It is recommended for deletion in order to allow tar sand development in the Circle Cliffs region. I am emphatically opposed to any tar sand development in this wilderness region. Tar sand is an extremely expensive and uneconomic alternative to oil and gas. The development of these resources is made possible only by huge government subsidies. In addition, the process for extraction of oil and the on-site production and treatment facilities would wreak havoc on the sensitive environment in this area. The upper Escalante and the lower portion of Capitol Reef National Park would be permanently impaired. It just does not make sense to destroy a huge tourist attraction in order to develop an uneconomical resource.

c. Little Death Hollow and Wolverine Creek are two of the three most spectacular canyons in this ISA (the other in North Red Breaks), and both have been largely or totally excluded as wilderness from BLM's Proposed Alternative, and a short section of the Escalante River is deleted as well. Thus, the door appears to be left open for future intrusion. Please explain the reason for these exclusions.

d. BLM's apparent commitment to tar sand development is further emphasized in its 0.25 mile-boundary setback along the Burr Trail road. The object of the setback, explains the Draft EIS narrative, is "to avoid conflict with potential realignment and paving of the Burr Trail road." It is no coincidence that BLM's tar sand Draft EIS concludes that paving and realigning of the Burr Trail road will be mandatory for tar sand development, since the Burr Trail is the only possible egress from the Circle Cliffs and since it cannot handle the projected traffic volume of 140 truck trips per day without realignment and paving. Access to the development area will, of necessity, be over an all-weather road capable of sustained heavy truck traffic. Thus, it will be necessary to realign and upgrade the Boulder to Bullfrog road. We adamantly oppose the Circle Cliffs tar sand development proposal. We urge BLM to re-evaluate its exclusion of 19,000 acres in the vicinity of Little Death Hollow and Big Bown Bench. This huge wedge of completely wild land harbors some of the most beautiful and exciting canyon country in the entire Escalante Canyon system. Wolverine Canyon features an extraordinary deposit of petrified wood, including logs 3 feet in diameter and 300 feet long. Little Death Hollow, Silver Falls Canyon, and Lower Horse Canyon are exceptionally beautiful. Little Death Hollow offers one of the most exciting hikes in all of southern Utah, narrowing down to 10 inches in places, with a profusion of natural alcoves, arches, and bridges. To sacrifice such an area to tar sand or any other form of development would be a tragic--and unnecessary--loss.

**31.15 RESPONSE:** See the responses to Specific Comments 31.4 and 31.5.

**31.16 COMMENT:** We do not understand the objective of this alternative which is "to analyze that portion of the ISA which includes and immediately surrounds the Gulch and North Escalante Canyons ONAs. This objective forgets about the portions of the Escalante Canyons ONA which are adjacent to the Glen Canyon NRA. It also implies that the ONAs are the only parts of the ISA that contain wilderness characteristics which is false. As far as we know, there is not a requirement to just consider areas that were previously designated as special management areas. [Rex and Judy Wells]

**31.16 RESPONSE:** The 54,500-acre partial alternative focuses on most of the ONA. It is correct

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

that two isolated tracts adjacent to the national recreation area are not included in the alternative. The EIS does not indicate that the ONAs are the only parts that have wilderness characteristics. The alternative was formulated by BLM for EIS analysis and is not the result of any requirement to include or exclude previous special management areas.

**31.17 COMMENT:** BLM's reasons for proposing the Partial Wilderness Alternative for the ISA are based on misinterpreting the wilderness requirements, proposing an unnecessary boundary setback along the Burr Trail, and using speculative mineral values in the eastern part of the ISA. BLM should change the Proposed Action to All Wilderness. [Owen Severance]

**31.17 RESPONSE:** See the responses to Specific Comments 31.4 and 31.5.

**31.18 COMMENT:** Two areas in particular that deserve protection in this ISA include: (1) Wolverine Canyon and (2) Big Bown Bench. It appears that BLM dropped these areas because of potential uranium and tar sand development, even though the Draft EIS clearly states that there is a "low likelihood of recovery" for these minerals. [Sierra Club, Cache Group]

**31.18 RESPONSE:** See the response to Specific Comment 31.5.

**31.19 COMMENT:** The exclusion of this area from the wilderness recommendation was totally unsupported in the Draft EIS. If one reads between the lines, it would seem that there are some extractable minerals which are in the vicinity of the area. I can't imagine that the deposits are of sufficient magnitude or importance to our national security that it warrants digging in this lovely area. I support the All Wilderness Alternative. Additionally, I would like to make some specific comments in support of the all wilderness recommendation. First, the damage being done to grassy benches and wash areas by ORVs in lower Horse Canyon is appalling. Wilderness designation for the entire area would hopefully give greater incentive to BLM to make vehicular access more difficult. Secondly, the impact of overgrazing in this canyon system is especially evident. In order to preserve the wilderness resource, BLM should reduce grazing allotments to the point where the casual observer cannot tell if cattle are using the area. Some shady areas in the canyon are so thick with dried cow manure that it is literally impossible to sit down on grass without first moving at least one pile. [Roger Jenkins]

**31.19 RESPONSE:** Appendix 11 in Volume I summarizes the rationale for the Proposed Action alternative. Wilderness designation would not change the existing livestock use, as continuation of grazing is specifically permitted as one of the basic provisions of the Wilderness Act.

**31.20 COMMENT:** Sacrificing areas such as Little Death Hollow, Wolverine Canyon and the surrounding bench lands for a short-lived (15 years) development of the Circle Cliffs tar sand deposits is unacceptable. This place is irreplaceable, plus the oil reserves found here are moderate and very expensive (approximately \$135 per barrel). [Robert and Deanna Tubs]

**31.20 RESPONSE:** See the response to Specific Comment 31.5.

**31.21 COMMENT:** BLM should not remove the Circle Cliffs Special Tar Sand Area from their North Escalante Canyons wilderness proposal. Tar sand is a costly method of oil production that destroys the land like no other mineral extraction process. We find it hard to believe that this unproven oil development technique could be used to justify BLM's decision to discount thousands of prime wilderness acreage. In the future, if the nation decides that we will need this costly oil, then the Wilderness Act would allow for removal of the required land from the wilderness system. Until then, the area should be protected as wilderness. The northern wilderness boundary should be extended to the Burr Trail so that the natural landscapes and scenic character of that dirt road are protected for visitors. Even the current NPS Director, William Mott, has stated that the natural beauty of the Burr Trail's boundaries must be protected. Therefore, no Burr Trail setback is required as stated by BLM. [Sierra Club, Cache Group]

**31.21 RESPONSE:** See the response to Specific Comment 31.5. Also, regarding the Burr Trail setback, see the responses to Specific Comments 30.3, 30.4, and 30.5 and General Comment 3.32.

**31.22 COMMENT:** The Colorado Plateau has the finest desert scenery, and in greater abundance, than any other place in the entire nation--and probably the world. People travel from all over the world to visit these incredibly scenic and remote lands. The plateau contains seven national parks and numerous national monuments. In this land of

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

superlatives, the Escalante River Canyons are the most spectacular, the most beautiful, the most fun, the most popular, and the most famous. The Escalante is the best of the best! These canyons are internationally acclaimed for their beauty, solitude, and unsurpassed recreation opportunities. These canyons are proven recreational assets, proven tourist attractions, and proven (and undisputed) wilderness. Yet your agency is willing to sacrifice large chunks of Utah's prime wilderness jewel for an ephemeral short-term economic gain. I am shocked and appalled! [Scott Delong]

**31.22 RESPONSE:** The scenic attributes of North Escalante Canyons/The Gulch ISA and related areas are recognized in the EIS. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action alternative.

**31.23 COMMENT:** This entire canyon complex is one of the most popular BLM backcountry areas in Utah. Its outstanding natural features provide exceptional primitive outdoor recreational opportunities in a very natural setting with extensive solitude. Even BLM seems to have acknowledged this by its "Outstanding Natural Area" designation for most of the area. Even though the 100,000 acres proposed as wilderness by BLM for the Escalante Canyons area is admirable, true protection of this area, which was once proposed as part of a national monument in the late 1930s, can best be accomplished by accepting the Utah Wilderness Coalition's 125,000-acre proposal. With similar lands in the Glen Canyon NRA, there is a potential for a 500,000 plus acre wilderness area. [Sierra Club, Cache Group]

**31.23 RESPONSE:** The ONA designation was for 10,082 acres. The other 109,218 acres of the ISA are outside of and contiguous to the ONAs. BLM does not agree that wilderness designation is "best" for 125,000 acres. BLM's Proposed Action in the Final EIS is for designation of 91,558 acres.

**31.24 COMMENT:** The North Escalante Canyon ISA is the heart of the Escalante Canyon system. It has long been recognized for its high scenic and wilderness values. Large sections of this ISA were set aside years ago as four "Outstanding Natural Areas." Now the Draft EIS proposed that a 19,000-acre wedge be dropped from further wilderness consideration! This proposed deletion includes Horse Canyon, Wolverine Canyon, Little Death Hollow, and the north fork of Silver Falls Canyon. Furthermore, these deletions would cut right into the heart of the ISA--right to the Escalante River itself!!! These canyons are magnificent and important

specimens of the Escalante area. They contain some of the most awesome scenery and highest quality recreation in the entire complex. They are, in short, superb wilderness and integral parts of the Escalante wilderness complex. Why are these canyons being deleted? These areas are being deleted because of possible tar sand development. I am utterly opposed to the development of the Circle Cliffs Special Tar Sand Area. Development of these tar sand areas would result in environmental havoc and would destroy the Escalante Wilderness/Capitol Reef National Park areas for all time. This area is a proven economic resource and tourist attraction. If properly managed it will remain so indefinitely. It can only increase in value as our population increases. The choice is simple: protect this area as wilderness and choose a renewable economic resource; or destroy this area for all time and reap a short-term profit from mineral extraction. What makes your proposal even more outrageous is the fact that tar sand oil extraction is completely uneconomic! Hundreds of millions of dollars in subsidies from the Federal government are the only reason that these areas are being considered for mineral development. I strongly object to my tax dollars being used to finance this wasteful and environmentally disastrous boondoggle!! [Scott Delong]

**31.24 RESPONSE:** See the responses to Specific Comments 31.4 and 31.5. The BLM Proposed Action would protect the North Escalante Canyon and contiguous lands. There are no current plans for subsidies or use of Federal taxes to finance tar sand development at Circle Cliffs (or in other STSAs), as the Federal Synfuels Corporation no longer exists.

**31.25 COMMENT:** The fact that the omitted 19,000 acres have exceptional wilderness value is not the only reason why they should be recommended as wilderness. The 19,000 acres are important to the Escalante as a whole. As previously discussed, Little Bown, Big Bown, and Wolverine Benches are worthy destinations in and of themselves. As a result, the Escalante experience need not be limited to a canyon-stream experience. In addition to providing variety in destinations, the omitted bench land provides alternative travel routes. The Draft EIS notes that the variety of travel routes in the Escalante is one of the factors that makes the Escalante so popular. All this helps to disperse recreation. Over use of the canyons may be the biggest threat to the Escalante that exists. The Draft EIS laments that the canyon-stream

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

topography of much of the ISA "funnels visitors into the same areas and could result in a negative effect on solitude and primitive recreation values." If preserved, the 19,000 acres can help to preserve the entire Escalante. With the Horse Canyon cherry-stem, the cherry-stem allowing CO<sub>2</sub> production from the middle of the Box-Death Hollow Forest Service Wilderness and Lake Powell flooding the lower parts of the drainage, history has made all the compromises in favor of development that should be made. The wilderness value of what remains of this glorious area outweighs the value of undeveloped minerals. [David Jorgensen]

**31.25 RESPONSE:** See the response to Specific Comment 31.5. With or without the designation of wilderness in the North Escalante and Wolverine areas, the patterns of recreation use will continue to concentrate on the canyons. The canyons have water, riparian vegetation, and scenic values which tend to attract the majority of the visitors. BLM would manage the area to maintain the values that contribute to wilderness quality.

**31.26 COMMENT:** All facts presented in the Draft EIS support selection of the All Wilderness Alternative and refute the selection of the Partial Wilderness Alternative as the proposed course of action for the North Escalante Canyons/The Gulch ISA. [Neal Berg]

**31.26 RESPONSE:** Appendix 11 in Volume I summarizes the rationale for the selection of the 91,558-acre Partial Wilderness Alternative as the BLM Proposed Action.

**31.27 COMMENT:** The BLM proposal unnecessarily eliminates acreage in two major areas. First, it establishes a 0.25-mile setback which is unnecessary and the standard setback is adequate (page 32, Volume 1). Second, if the cost of uranium approaches \$100/lb (an extremely unlikely possibility), then BLM may be justified in eliminating the eastern section of the ISA. This area should be reinstated to make the ISA whole again. [Kim Jennyson, et al.]

**31.27 RESPONSE:** See the response to Specific Comment 31.5. Also, regarding the Burr Trail setback, see the responses to Specific Comments 30.3, 30.4, and 30.5, and General Comment 3.32.

**31.28 COMMENT:** The facts set forth in the Draft EIS do not support the deletion of 19,000 acres in the southeast corner of the ISA from wilderness. The wilderness values in the excluded portion are admitted to

be exceptional and are acknowledged to be a significant part of the Escalante. Ostensibly, the 19,000 acres were excluded because of mineral conflicts. But the Draft EIS acknowledges that mineral development is unlikely at all for tar sand and unlikely in the near future for uranium. The Draft EIS documents the fact that the wilderness values of the excluded portion outweigh the mineral values. [Utah Wilderness Alternative]

**31.28 RESPONSE:** See the response to Specific Comment 31.5.

**31.29 COMMENT:** The Draft EIS admits the likelihood of uranium "development in the near future is thought to be minimal because of economic considerations." The DOE rating which raised the uranium rating over the SAI values also raised the ratings all over the Colorado Plateau. If the DOE is right, there is a lot of uranium outside the ISA and other WSAs. If the DOE is wrong, the uranium inside the WSA is even less important. [Utah Wilderness Association]

**31.29 RESPONSE:** The availability of uranium potential in locations outside of the ISA is a consideration reflected in the rationale for the Proposed Action the Final EIS. See Appendix 11 in Volume I.

**31.30 COMMENT:** The air quality impacts of the Proposed Action relate to prevention of significant deterioration (PSD) requirements. The Final EIS needs to explain more thoroughly the policy options and environmental consequences of designation of BLM wilderness areas as Class I. Furthermore, any proposed (or already excluded) area may already be precluded in full or in part from certain resource development because of the potential for that development to exceed PSD increments in current or potential Class I areas. The following example illustrates this point. Tar sand development is listed as a medium or high potential development in three WSAs; Fiddler Butte, Horseshoe Canyon (South), and French Spring-Happy Canyon, all part of the Tar Sand Triangle. The development of tar sand resources within the Tar Sand Triangle is constrained by the adjacent Class I air quality designations. Accordingly, EPA concluded in 1984 in its review of the Tar Sand Triangle Draft EIS that the environmental impact of tar sand development would be environmentally unsatisfactory unless more stringent air quality control measures or appropriate reduction in development levels were pursued.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

EPA suggests that further consideration be given to the likelihood of such development and possibly allow these WSAs to be considered in the Proposed Action. [U.S. Environmental Protection Agency]

**31.30 RESPONSE:** The EIS clearly explains that new wilderness areas would remain as air quality Class II, unless the designation is changed by the State of Utah. It is assumed that such a change would not occur; therefore, wilderness designation would have no effect on air quality or potential air quality constraints to adjacent areas. The EIS notes that the Class I air quality area nearest to the North Escalante Canyons/The Gulch ISA is Capitol Reef National Park. Any tar sand (or other development) in the Circle Cliffs region would have to meet the applicable PSD standards. See the responses to General Comments 10.3 and 10.4.

**31.31 COMMENT:** Geology - where are the steep walled canyons, mesas, and plateaus? Name them and identify them. [Kim Jennyson]

**31.31 RESPONSE:** The names of the major canyons, mesas, and plateaus are shown on the maps included with the description of the alternatives. For additional detail, refer to USGS 7.5 Minute Topographic Maps: Calf Creek, King Bench, Wagon Box Mesa, Moody Creek, Red Breaks, and Tenmile Flat. Also see the Affected Environment discussion of wilderness values.

**31.32 COMMENT:** There are very, very few mammals or birds that can survive in the desert even though they are specialized for desert habitat. They must have aquatic habitats. The wilderness proposal sets aside many of them. Some of the ones that I am familiar with that would be important are Canaan Mountain, Orderville Canyon, the North Escalante Canyons/The Gulch ISA Complex, and the Phipps-Death Hollow ISA. [Alice Lindahl]

**31.32 RESPONSE:** The presence of riparian and aquatic habitat in the North Escalante Canyons/The Gulch ISA is recognized in the Final EIS.

**31.33 COMMENT:** These WSAs have riparian habitat. The impacts of the alternatives on this habitat are not analyzed. [Scott Mills]

**31.33 RESPONSE:** See the response to Specific Comment 29.16.

**31.34 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the

WSAs included in the alternatives. A study entitled "Resource Survey of Hydroelectrical Power Potential in Utah and Southeast Idaho, by Calvin G. Glyde, Eugene K. Israaelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identifies potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**31.34 RESPONSE:** See the response to General Comment 14.27.

**31.35 COMMENT:** It appears that no existing Reclamation projects would be affected, but two Reclamation projects that have been the subject of past studies would be precluded by wilderness designation. These are the Gray Mountain and Escalante projects. The wilderness study areas affecting the Gray Mountain project are Jack Canyon, Desolation Canyon, and Turtle Canyon. The WSAs affecting the Escalante project are Phipps-Death Hollow, Steep Creek, and North Escalante Canyons/The Gulch ISA Complex. Project planning on the impacted projects has not been active for many years and will, most probably, remain inactive in the foreseeable future. [Bureau of Reclamation]

**31.35 RESPONSE:** After personal communication with the Bureau of Reclamation in September 1988, BLM determined that the Escalante and Gray Mountain projects are still inactive and it is unlikely that they would ever be activated. In addition, there have been no reclamation withdrawals for the Escalante project. Reclamation withdrawals for the Gray Mountain project were revoked in March 1982. Therefore, these projects are not considered in the Final EIS.

**31.36 COMMENT:** UP&L has water rights and pending applications relevant to the following listed WSAs: Phipps-Death Hollow ISA Complex, Steep Creek, and North Escalante Canyons/The Gulch ISA Complex. UP&L has pending water rights in the Escalante River basin for future steam electric plant development. Rights amount to 165,000-acre feet

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

and 29,555 CFS for power, mining, domestic and irrigation use. [Utah Power and Light]

**31.36 RESPONSE:** Additional narrative on water rights and uses has been provided in the Final EIS.

**31.37 COMMENT:** I have not seen in your WSA study information any acknowledgment of the anticline in the Lower Escalante study area. This area has yet to be drilled and tested and I urge you to reject any proposed wilderness in this area until the drilling is done. For more site-specific information on the location of the anticline, please contact Helmut Doeling with the Utah Geologic and Mineral Survey in Salt Lake City, Utah. He and other UGMS staff have done significant study in the area. [Guy Thompson]

**31.37 RESPONSE:** The UGMS information has been reviewed and is reflected in the Final EIS.

**31.38 COMMENT:** The minerals in question are tar sand and uranium. Yet the Draft EIS admits that, "it is unlikely that development of any tar sand resource will take place in the ISA" because of topography and access problems. This admission was printed before the Syn-fuels Corporation's last days and is even truer today. Also, the BLM Cedar City District recommended that no conversions be allowed in the Circle Cliffs tar sand area (phone communication, Dennis Curtis BLM 7/2/86) although no final decision has been made. In any case, the Circle Cliffs Special Tar Sand Area (STSA) is one of the least significant of the tar sand areas. [Utah Wilderness Association]

**31.38 RESPONSE:** The processing of the lease conversions for Circle Cliffs has been suspended indefinitely. The Circle Cliffs STSA has less in-place reserved than the Tar Sand Triangle, P.R. Spring, and Sunny-side STSAs.

**31.39 COMMENT:** The near-term potential for commercial tar sand is generally considered to be low; present technology and economics make these deposits unlikely to be developed in the near future. [State of Utah]

**31.39 RESPONSE:** BLM concurs with the comment, as reflected in the analysis assumptions in the Final EIS.

**31.40 COMMENT:** BLM proposes nondesignation for 19,000 acres of this area based in large part on future conflicts with Circle Cliffs tar sand. In its analysis of leasable minerals, the Draft EIS correctly points out

that development is unlikely because of the low quality of the deposit, the lack of water, and the limited accessibility of the deposit. In fact, the entire Circle Cliff deposit is ranked by the energy industry as very low on the list of developable resources in Utah and the United States. According to a 1976 Bureau of Mines report (Glassett and Glassett, Eyring Research Institute), "A number of factors discourage . . . mining of the Circle Cliffs deposit. By and large, the deposit is very lean . . . rich areas are widely scattered . . . it may not be feasible to recover the bitumen by in-situ methods due to tar sand compaction, low porosity, and low bitumen content. The presence of considerable siltstone may interfere with both in-situ recovery and bitumen-sand separation of surface-mined material . . . relatively high sulfur content is a significant deterrent to marketing . . . as a feedstock to refineries." Wood and Ritzma, in a 1972 Utah Geological and Mineralogical Survey Special Study (#39), tested 12 Circle Cliffs deposits and found that "data indicate that the Circle Cliffs deposit is undesirable in at least three aspects when compared with Uintah Basin deposits. The tar sand is poorly saturated with oil, the oil is usually heavy, and the oil contains a high percentage of sulfur." The Glassett study also cites climatological factors, unavailability of water, and remoteness as negative factors, and concludes that "the Circle Cliffs deposit ranks next to lowest among Utah tar sand deposits." Given the apparent infeasibility of the Circle Cliffs deposits, one might wonder why conservationists fear they could be mined at all. Indeed, BLM seems to adopt a laissez-faire attitude, evidently ascribing no adverse environmental cost to their failure to recommend wilderness for much of the area of the deposit. Our concern is that the deposit could be developed with heavy government subsidy, as in Canada, or could be so intensively explored and tested in hopes of development that wilderness values would be lost. The public is placed in a double bind: the Draft EIS says, in effect, not to worry; tar sand will not be developed, yet the Draft EIS chalks up vast resources that would be foregone if the area were designated wilderness. This inconsistent treatment reflects the overall bias of the Draft EIS toward the production of commodities. [Utah Wilderness Coalition]

**31.40 RESPONSE:** See the responses to Specific Comments 31.4, 31.5, 31.24, 31.38, and 31.39.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

Also, see the response to General Comment 9.4 concerning inconsistencies in development assumptions.

**31.41 COMMENT:** The analysis of uranium resources should be revised [Utah Wilderness Coalition and State of Utah]

a. BLM has evidently given nonsuitable recommendations for several WSAs on the basis of speculative uranium resources. For example, 19,000 acres in the North Escalante Canyons/The Gulch ISA were left out, presumably because of uranium deposits. SAI rated this area 2+ because of uranium prospects and deposits along the east edge of the area near the Circle Cliffs. SAI notes that inferred and known deposits could be as much as a few hundred tons, but most of this material is currently not economic to extract. The 1981 USGS mineral resources report on the area (open-file report 81-559) concludes that the mineral and energy resource potential of the area is low. This is at variance with the high rating used in the Draft EIS (v. 3b, p. 25 of area analysis), which is based on a single "personal communication" from DOE. The Draft EIS gives no explanation why two published analyses of the entire area are passed over in favor of an unpublished analysis that lumps the 19,000 acres into the 1,126-square-mile Circle Cliffs Probable Resource Area. The Draft EIS analysis should be based on the published area specific analysis instead of an unsupported generalization. On the basis of this example, the uranium resource evaluation is suspect and should be redone; areas dropped for reasons of supposed uranium conflicts should be reinstated to the wilderness recommendation.

b. For uranium, the favorability assessment seems reasonable, but it might be advisable to use a 0.01 percent cut off for economics if radiometric logs are the basis of grade, a 0.03 percent cutoff might be preferable.

**31.41 RESPONSE:** See the responses to Specific Comments 31.5 and 31.29.

**31.42 COMMENT:** ISA 31 drops 19,000 acres in the BLM Proposed Action along the eastern edge of the ISA in an area of speculative mining activity along the Circle Cliffs. SAI rates the area 2+. "The main reason for the rating is the uranium prospects and deposits that lie along the east side of the tract. Inferred and known deposits could be as much as a few hundred tons, but most of this material is currently not economical to extract." The 1981 USGS Mineral Resources report on the ISA (OF-81-559) concludes that "The mineral and

energy resource potential of the Escalante Canyon ISA is low." Yet despite this analysis, in proposing to drop the 19,000 acres, BLM states "the objective of this alternative is to analyze as wilderness that portion of the ISA that would have the fewest conflicts with potential future mineral development." This proposal is clearly unjustified and is based arbitrarily upon a single "personal communication" which is used to lump the 19,000 acres into the 1,126-square-mile "Greater Circle Cliffs Probable Resource Area" which is then awarded a (c4) and (f4) rating despite specific appraisals of this section of the ISA which directly contradict this extreme generalization. [Roy Young]

**31.42 RESPONSE:** See the responses to Specific Comment 31.5 and General Comments 15.33 and 15.34.

**31.43 COMMENT:** Since all pre-FLPMA leases will have to expire before or on 10/21/86 unless held by production, which does not seem to be occurring, the number and acreage of pre-FLPMA leases will have to be revised in the Final EIS. This will also change the total acreage under lease since no new leasing can occur in land under wilderness review. [Rex and Judy Wells]

**31.43 RESPONSE:** Lease information has been updated in the Final EIS.

**31.44 COMMENT:** It is not true that the Chinle Formation in the eastern side of the ISA must be considered favorable for small economic copper deposits. The most that can be said is that the area may be favorable for such deposits. However, Weir and Lane state that uranium-copper deposits in Triassic rocks near the east edge of the study area are "small and relatively low grade, and no pattern of ore bodies has been recognized that would encourage exploration." Consequently, Weir and Lane also judged the potential for copper to be low. [Rex and Judy Wells]

**31.44 RESPONSE:** The EIS states that the potential for copper is low. The reference to "favorable" has been revised to clarify the intent.

**31.45 COMMENT:** The potential for uranium described in this section does not correspond to the mineral investigation conducted by the USGS/USBM. Weir and Lane (Open-File Report 81-559, 1981) states uranium deposits within the ISA are

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

"small and low grade" and that the potential is "judged to be low." This report includes the portion of the ISA within the Circle Cliffs. [Rex and Judy Wells]

**31.45 RESPONSE:** The narrative regarding uranium has been reviewed and revised. The uranium potential is considered to be lower in the east part of the ISA than previously described in the Draft EIS. It is assumed that without wilderness designation the eastern area would be further explored for uranium; however, commercial production is not expected in the foreseeable future.

**31.46 COMMENT:** There is a problem with tar sand resource figures; the No Action Alternative discusses 14 million barrels of oil from tar sand while the 100,300-acre partial alternative designation lists 38 million barrels of oil recoverable from tar sand. [State of Utah]

**31.46 RESPONSE:** In the text of the Draft EIS, both the No Action Alternative and the 100,300-acres partial alternative identify 14 million barrels of oil from tar sand. The partial alternative shows 1.9 million foregone in the designated portion and 12.1 million recoverable in the nondesignated portion. The 38 million listed on the Summary Table (Table 1) was in error. The 100,300-acre partial alternative has been revised to 91,558 acres, involving different locations in the Final EIS; and the tar sand estimates have been corrected accordingly.

**31.47 COMMENT:** An SAI rating for copper is probably unnecessary. [State of Utah]

**31.47 RESPONSE:** SAI did not provide a rating for copper.

**31.48 COMMENT:** The limitations placed on potential surface-disturbing activities do not include 13,700 acres currently under a no surface occupancy stipulation, in discussion of wilderness values. [Rex and Judy Wells]

**31.48 RESPONSE:** The area with no surface occupancy has been included in the analysis assumptions for the Final EIS. Disturbance estimates have been revised.

**31.49 COMMENT:** BLM lists the number of raptors present in the ISA. The specific species should be listed and accompanied by brief descriptions of particular habitat requirements. [Scott Mills]

**31.49 RESPONSE:** See the response to Specific Comment 26.39.

**31.50 COMMENT:** There is no mention of the endangered peregrine falcon in the Draft EIS. According to the draft EA, Paving the Boulder-to-Bullfrog Road (US NPS and BLM, May 1985), a peregrine falcon pair nests in the Long Canyon area which borders the ISA. Why was no mention of this made in the Draft EIS? [Utah Wilderness Association]

**31.50 RESPONSE:** See the response to Specific Comment 26.39. A survey in May 1987 by BLM and State representatives found no evidence of a peregrine falcon nesting site or peregrine falcon presence in Long Canyon (USDI, BLM, 1987).

**31.51 COMMENT:** Have studies been done to explore Deer Creek and Boulder Creek for Humpback minnows or Colorado Squawfish? [Kim Jennyson]

**31.51 RESPONSE:** Surveys were done by BLM in August 1977 and by BLM/Utah DWR in July 1981. Neither the Humpback minnow or the Colorado squawfish were found.

**31.52 COMMENT:** The visual resources data and analyses are not accurate. [Utah Wilderness Association, Michael Salamacha, and Kim Jennyson]

a. The Draft EIS discussion in this unit is deficient in a couple of categories. First, BLM classifies 78,650 acres as VRM class IV (maximum modification, the lowest VRM class) yet classes 51,300 acres as Class A (the highest quality) scenery. Therefore, some of the Class A scenery is in VRM Class IV since there are only 119,300 acres in the ISA. This is not possible according to the newly revised Visual Resource Inventory Manual (H-8410-1). Why is there this discrepancy in management?

b. The Visual Resource Inventory needs to be redone because of contradictions in the Draft EIS, i.e., VRM Class IV designation of 78,650 acres which is the lowest VRM classification, while at the same time BLM classifies 51,000 acres of the ISA as Class A scenic quality which means some of the Class A scenic land has a Class IV VRM classification.

c. The most disturbing information in the EIS is the VRM Class IV designation of 78,650 acres of the ISA. Class IV is the lowest visual resource



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

management classification and allows almost any land disturbing activities to take place. BLM classifies approximately 51,300 acres of the ISA as Class A scenic quality which means some other class A scenic quality land has a Class IV VRM classification. This is not possible according to the newly revised Visual Resource Inventory Manual (H-8410-1). The visual resource inventory needs to be redone using the latest manual so the VRM classifications properly reflect the scenic qualities of the ISA and BLM isn't allowed to eliminate any of the ISA from the wilderness proposal.

**31.52 RESPONSE:** The visual resources inventory and evaluation study was done by Ray Mann Associated in 1977, using accepted BLM criteria and methods. See the response to General Comment 19.1.

**31.53 COMMENT:** The visual resource has been improperly downgraded by classifying much of the Class A scenic quality area as either Class III scenic quality of the ISA. In spite of the fact that only 14,000 acres are given a Class C scenic quality rating, 78,650 acres of the ISA are placed in the Class IV VRM rating. This downgrading was obviously done so that disturbing activities could take place almost anywhere without regard to the scenic quality of the ISA. This was not the intention of the visual resource inventory. [Owen Severance]

**31.53 RESPONSE:** See the response to Specific Comment 31.52. The VRM rating was derived independently from any proposed or potential surface-disturbing activities. It was done objectively to provide baseline information as part of normal multiple use inventory, planning, and management. Also, it preceded the wilderness study.

**31.54 COMMENT:** It is important to note that the major deletion of 19,000 acres proposed by BLM coincides with what is undoubtedly the area of greatest potential for primitive outdoor recreation. The spectacular narrow canyon bottoms, particularly of Little Death Hollow, the magnificent panoramas of Big Bown Bench, the unusual honeycombing in the walls of Wolverine Canyon, the outstanding potential for rockhounding amid huge deposits of petrified wood, and the general size and complexity of the whole area make it a premier component of the Escalante Canyon system. [Utah Wilderness Coalition]

**31.54 RESPONSE:** The EIS recognizes the outstanding opportunities for primitive recreation present in this area. See the response to Specific Comment 31.5.

**31.55 COMMENT:** This unit contains a superb variety of deep meandering canyons, isolated bench-tops, vertical walls arising from stream courses (Deer Creek and Boulder Creek) and rounded wall canyon with frequent twists and bends (Upper Deer Creek and Harris Wash). This variety of topography with a combination of dense vegetation allows for a multitude of secluded areas. The broad open valleys coated with dense amounts of juniper and pinyon supply outstanding amounts of screening. The entire unit qualifies for wilderness although the Draft EIS claims only 75 percent of the ISA offers outstanding opportunities for solitude. This is due to the incorrect definition of solitude which was used. Also, the Draft EIS states that 79 percent of the ISA provides outstanding opportunities for primitive recreation. Backpacking qualities should not determine the wilderness characteristic of the area. Backpacking areas are outstanding in the ISA as well as the opportunities for hiking, drawing, nature study, geologic sightseeing, and photographing. [Kim Jennyson]

**31.55 RESPONSE:** Opportunities for many types of primitive recreation were considered in addition to backpacking.

**31.56 COMMENT:** We applaud BLM's recognition of the superb wilderness character of this roadless area. Throughout the Draft EIS narrative the agency has tipped its hat to the extraordinary recreational, scenic, geologic, biological, and archaeological treasures of the Escalante Canyon system. We are shocked, therefore, at the deletion of an enormous 19,000-acre chunk of pristine canyonlands in the vicinity of Little Death Hollow/Big Bown Bench. We note that BLM's "Proposed Action" alternative omits a portion of the Escalante River Canyon itself from wilderness consideration! This is inexcusable! Such a recommendation would allow impairing developments along the Escalante River itself, with the potential for permanent loss of wilderness character in the very center of one of the few remaining wholly wild river/canyon systems in the nation.

Surely BLM can recognize the importance of protecting this entire region from development. Yet the proposed tar sand development which BLM identifies as the reason for omitting 19,000 acres would be one of the most environmentally destructive developments ever undertaken in southern Utah. [Utah Wilderness Coalition]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

**31.56 RESPONSE:** See the responses to Specific Comments 31.4 and 31.5.

**31.57 COMMENT:** Why is 1981 the last year for which recreation use data is available? [Brian Wood]

**31.57 RESPONSE:** See the response to General Comment 21.5.

**31.58 COMMENT:** Your proposed wilderness area omits 19,000 acres of spectacular canyon country. I have walked in those canyons and Little Death Hollow and can personally attest to their beauty. The old jeep trail in Horse Canyon is barely discernable in parts due to erosion and so fast being reclaimed - I didn't feel it affected my wilderness experience at all. [Sara Irving]

**31.58 RESPONSE:** See the responses to Specific Comments 31.54 and 31.6.

**31.59 COMMENT:** The EIS states, "Benches such as Little Bown and Big Bown offer high quality scenic or solitude experiences for the backpacker." Concerning these same benches in the eastern section of the ISA you state, "Many of the bench tops exhibit an intricate pattern of innumerable orange-red Kayenta sandstone knobs." Also, ". . . canyons draining to Horse Canyon through the Circle Cliffs escarpment have created a unique canyon and bench system." These are just the canyons and benches your Proposed Action alternative leaves out of the wilderness, and it should not be. Here of all places let's take a stand that the wilderness is the most important resource and then back up this conviction with a proposal worthy of such an inheritance. [Robert Hassell]

**31.59 RESPONSE:** Little Bown and Big Bown Benches and the related canyons have been included for wilderness designation in BLM's Proposed Action in the Final EIS.

**31.60 COMMENT:** Speculative mineral values were used to eliminate most of the eastern part of the ISA including Wolverine Canyon, Death Hollow, and Big Bown Bench. This area of spectacular canyons should not be left out of the proposal because of the highly unlikely possibility that the price of uranium might reach \$100/lb. The wilderness values of this area are obvious. The proper definition of solitude (isolation) was ignored and even the Cedar City District's improper "screening" requirement is used incorrectly. The upper ends of both Death Hollow and Wolverine Canyon are rolling and eroded and support sagebrush and pin-

yon/juniper vegetation. Hiker's sightlines are less than 0.25 mile in these canyons. The statement that "certain areas in the interiors of the three largest benches (Brigham Team, King, and Big Bown) are open and flat and offer a less than outstanding opportunity for solitude" is ridiculous since these benches are "totally isolated by surrounding cliffs or canyons." There are outstanding opportunities for solitude throughout the ISA. I disagree with the conclusions on primitive recreation also. The Draft EIS uses about 350 words to extoll the outstanding opportunities for primitive recreation, 0 words to say where these outstanding opportunities do not exist, then concludes that only 79 percent of the ISA meets the outstanding requirement. Wrong! All of the ISA meets the requirement for outstanding opportunities. The "wilderness characteristics" map in the SSA throws out areas around the perimeter where hiking, sightseeing, and photography are all outstanding. [Owen Severance]

**31.60 RESPONSE:** See the response to Specific Comment 31.14. Appendix 11 in Volume I of the Final EIS summarizes the rationale for BLM's Proposed Action.

**31.61 COMMENT:** The solitude discussion states "The user can also easily find seclusion on all but the interiors of the Brigham Tea, King, and Big Bown Benches of the ISA because of the isolating effect of the surrounding cliffs or canyons." From this wording, it would seem there are more opportunities for solitude near the rims of the benches which is ridiculous. The isolating effect of the surrounding cliffs or canyons would apply to the entire benches; therefore, it would be easy to find seclusion anywhere on these benches. [Rex and Judy Wells]

**31.61 RESPONSE:** BLM believes the interiors of the benches to not have outstanding opportunities for solitude due to lack of screening.

**31.62 COMMENT:** Wilderness for Long Canyon and Bullfrog Creek would help protect Capitol Reef and lands adjacent to the popular Burr Trail. Long Canyon was dropped during BLM's inventory process, supposedly because it lacked the solitude and the potential for wilderness recreation. Yet many canyons wind through slick rock in this unit, providing ample opportunities for solitude. The many streams that run through this unit facilitate hiking and backpacking. The NPS has proposed wilderness

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

for adjacent lands in the park. Bullfrog Creek was not included as a BLM WSA because it was said to contain human impacts. It is our understanding that these claims were exaggerated and that the beautiful creek, which emerges from a very deep red-walled canyon, is well deserving of wilderness status. [National Parks and Conservation Association]

**31.62 RESPONSE:** It is not the policy nor the intent for BLM to propose wilderness designation to provide protection (or buffers) for the national park. Portions of Long Canyon are included within adjacent wilderness study areas; however, the road and other human imprints were excluded as they do not meet the naturalness and solitude criteria.

**31.63 COMMENT:** The proposed alternative deletes the Big Bown Bench portion of the North Escalante Canyons WSA because of the Circle Cliffs tar sand deposit; however, it appears that the bench would be included in the manageability and All Wilderness Alternatives. The area is located next to the Silver Falls Canyon portion of Glen Canyon which is a designated Natural Zone and recommended for wilderness designation. [National Park Service]

**31.63 RESPONSE:** See the response to Specific Comment 31.59. Much of Silver Falls Canyon and Big Bown Bench are within the Glen Canyon NRA.

**31.64 COMMENT:** It is abundantly clear that massive tar sand development would permanently eradicate wilderness values throughout the North Escalante Canyons ISA as well as Capitol Reef National Park. Indeed, the proximity of Capitol Reef Park raises serious questions about the chances of tar sand development ever being allowed by the Federal government in the long term, since the air quality over the park would almost certainly be degraded to unacceptable levels by a major tar sand extraction project in the Circle Cliffs. BLM's wilderness EIS must address this critical issue. If tar sand development is unlikely in the Circle Cliffs, then BLM has no good reason for omitting 19,000 acres to allow tar sand development. If, on the other hand, its Wilderness EIS should face the issue foursquare with a detailed description of the environmental consequences of tar sand development, both inside and adjacent to the North Escalante Canyons ISA. [Utah Wilderness Coalition]

**31.64 RESPONSE:** The Draft EIS addressed the potential impacts from tar sand activities, particularly for the No Action/No Wilderness Alternative. Also, in-

formation on potential impact from tar sand development is contained in the Regional Tar Sand EIS (BLM, 1984) and the Circle Cliff Combined Hydrocarbon Lease Conversion Draft EIS (USDI, BLM, 1984). The action scenario in the Final Wilderness EIS has been revised to indicate that tar sand development is unlikely in the Circle Cliffs STSA. BLM now believes that wilderness values outweigh tar sand potential in the 19,000-acre area, and the Proposed Action has been revised.

**31.65 COMMENT:** The analysis of the North Escalante Canyons ISA, Escalante Canyons (Tract 5) ISA, and Scorpion WSA ignore the fact that these three units and the wilderness proposal of the Glen Canyon NRA are, in reality, one large area. The administrative boundaries exist only on maps and in people's minds. Although the analyses state that designation of these areas would complement the Glen Canyon NRA proposal, the analyses fail to recognize the complementary effect that designation of these areas would have on each other by preserving the entire Escalante River Canyon system's ecosystem. [Rex and Judy Wells]

**31.65 RESPONSE:** See the response to Specific Comment 31.1. The EIS does note the relationship of each of the three areas to the Glen Canyon NRA. Volume I includes the three areas in a cluster-concept alternative which reflects the complementary and cumulative aspects.

**31.66 COMMENT:** By deleting the areas adjacent to the Burr Trail, BLM is tacitly giving its approval to potential highway and powerline corridor intrusions which would drastically alter the naturalness and solitude of the areas. The paving of the Burr Trail is controversial and does not have Statewide public support. The road will probably never be paved because of public outrage and the extremely high construction costs relative to projected use. Therefore, there is no reason to delete the acreages adjacent to the Burr Trail. [Martin Barth]

**31.66 RESPONSE:** See the response to Specific Comment 30.5.

**31.67 COMMENT:** Since the Burr Trail won't be realigned, the 0.25-mile setback along the trail is unnecessary. Also, the eastern section of the ISA was eliminated from the proposal because of uranium deposits; these deposits would only be economical to mine if the cost of uranium reaches

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 31: NORTH ESCALANTE CANYON/THE GULCH ISA (CONTINUED)

\$100 per lb (an extremely unlikely event). [Kim Jennyson]

**31.67 RESPONSE:** See the response to Specific Comment 31.21.

**31.68 COMMENT:** In socioeconomics, there are significant discrepancies between the alternatives relating to the revenues from mineral leasing. This section states, "Half of these monies would be allocated to the State, a portion of which could reach the local economy." It is stated that "mineral leasing revenue that is directed back to local governments would be lost." Yet, it is stated, "This revenue would not be transferred to State programs; however, none of this money normally flows back to the local economy." The discussion also states that this money normally does not flow back to the local economy and adds "there would be little impact to local communities." We do agree that the loss of this income would be insignificant to the local economy. [Rex and Judy Wells]

**31.68 RESPONSE:** All of the socioeconomic information has been updated, revised, and clarified.

**31.69 COMMENT:** The amounts from livestock sales and ranchers' returns to labor and investment are the same as identified under the No Action Alternative. Therefore, the proposed improvements that would be foregone would not cause a significant impact. We would also question whether the improvements are really necessary since they do not appear to provide a positive return. [Rex and Judy Wells]

**31.69 RESPONSE:** The proposed improvements would not necessarily increase the numbers of livestock produced. The range projects would allow better management of the forage resource through improved distribution of livestock to areas where lack of livestock water is a problem.

**31.70 COMMENT:** How can the Red Canyon hot spring be 48 miles southwest of Steep Creek and 60 miles east of the North Escalante Canyons, when Steep Creek is due north of the North Escalante Canyons? [Brian Wood]

**31.70 RESPONSE:** The reference to Red Canyon was in error and has been removed in the Final EIS.

**31.71 COMMENT:** Maps 1, 2, 3, 4 - all four maps do not show the portion of the Deer Creek recreation site south of the Burr Trail as being within the ISA. The General Description of the Area does identify this area as

being within the ISA. Maps 2, 3, and 4 should show the boundaries of the adjacent Glen Canyon NRA wilderness proposal. [Rex and Judy Wells]

**31.71 RESPONSE:** The maps have been redone. The southern portion of the Deer Creek recreation site now is shown within the ISA. The Glen Canyon NRA is shown only on Map 1 - Land Status. It is not intended to repeat this information on all the maps. The existing or proposed wilderness of other Federal agencies is shown on Pocket Map 2, Volume I.

### SECTION 32 CARCASS CANYON WSA

**32.1 COMMENT:** BLM announced the end of the inventory in an undated document probably prepared in 1979. Here is what they said about Devils Garden: Man-made impacts within the area include two roads; a "way"; and a developed picnic area which includes two toilets, three picnic units, and parking facilities. An old access road had been scarified and seeded but it is substantially noticeable. These impacts are highly visible from most of the inventory area due to the lack of topographic and vegetative screening. The location impacts and their cumulative impact have resulted in the loss of naturalness characteristics. The areas topographic and low-growing vegetation preclude opportunities for solitude and make it difficult to avoid the sights, sounds, and evidence of other people in the area. The Devils Garden ISA does not satisfy the naturalness criteria nor does it contain outstanding opportunities for solitude. [Utah Wilderness Coalition]

These intrusions occupy less than 2 acres in one corner of the area. The seeded, reclaimed road can not be found by visitors on the ground at the current time. There is no physical evidence of this road based upon reports from a recent visit by our volunteers. Except for a few intrusions in one corner of the unit, the area is natural. The impacts in Devils Garden are limited to the picnic area and its access road which we recommended removing from the WSA. BLM violated the inventory process by not considering the adjacent roadless lands with the outstanding natural area in the wilderness review. BLM has no record of considering Carcass Canyon with Devils Garden. Devils Garden lies on the edge of this roadless area.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

**32.1 RESPONSE:** See the response to General Comment 3.1. Devils Garden is not adjacent to the Carcass Canyon WSA.

**32.2 COMMENT:** BLM needs to propose a wilderness boundary that allows some mining but protects critical archaeological values. The State identified part of these in their comments. BLM also needs to consider wilderness designation of areas where coal mining would be infeasible due to resource protection needs, nature of the geology, lack of access, and economic limitations. [Utah Wilderness Coalition]

**32.2 RESPONSE:** About 91 percent of the WSA is underlain by mineable coal. None of the area was determined to be unsuitable for mining based on the application of the unsuitability criteria. Mining would be by underground methods. Critical archaeological values would be protected by measures required during the mine plan approval process. Extraction of the coal is not considered to be economically feasible in the short term, but is considered to be a valuable resource in the long-term future.

**32.3 COMMENT:** A fair assessment of the Kaiparowits coal situation and how it relates to Carcass Canyon would conclude there is really no conflict. Severe environmental and economic constraints make Kaiparowits coal unlikely to ever be developed. BLM knows this. Add to that the fact Carcass Canyon WSA contains only 3.5 percent of the recoverable coal and it is easy to see the "conflict" is grossly overrated and unimportant. Recognition of this area's high wilderness values and the true nature of the coal conflict should result in an all wilderness recommendation for the Carcass Canyon WSA. [Utah Wilderness Association]

**32.3 RESPONSE:** See the responses to General Comment 15.44 and Specific Comments 26.24, 26.26, and 32.2.

**32.4 COMMENT:** By considering Carcass Canyon WSA a likely candidate for coal development and by downplaying the area's wilderness values, BLM has concluded that this area is "unsuitable" for wilderness designation. BLM is wrong on both counts and should support the All Wilderness Alternative for Carcass Canyon. [Utah Wilderness Association]

**32.4 RESPONSE:** BLM believes that the long-term potential for coal outweighs the wilderness considerations in this WSA.

**32.5 COMMENT:** I would like a more complete explanation of the rationale for decisions made concerning these and other similarly treated areas. In particular, why substantial acreages of some of the ISAs were deleted--if these areas are so unique that they merit ISA status, how can you cut out large chunks of them? North Escalante Canyon/The Gulch is a good example: 54,000 acres are included in BLM's recommendation, 98,000 acres meet your own narrow criteria for wilderness, why were 44,000 acres dropped? This is just one of many areas deleted, or chopped up with no valid explanations, at least in the scoping document. Please justify your actions. [Tim Graham]

**32.5 RESPONSE:** Carcass Canyon is not an ISA. The rationale for BLM's Proposed Action is summarized in Appendix 11.

**32.6 COMMENT:** The Draft EIS describes the reasons for BLM's Partial Wilderness Alternative: the objective of this alternative is to analyze as wilderness that portion of the WSA with the most outstanding wilderness characteristics. Potential conflicts with proposed vegetation manipulation and livestock reservoir construction would be avoided and most of the area with outstanding wilderness values would be designated as wilderness. BLM provides no detailed maps which show location and description of the conflicts described in this objective. Without detailed information on the character of these conflicts, the alternatives to them, and the significance of their impacts, we request that these conflicts be presented in a draft for review. [Utah Wilderness Coalition]

**32.6 RESPONSE:** The Draft EIS identified that the 2,400 acres of vegetation treatment and three proposed livestock reservoirs would be in the Last Chance Allotment. That allotment is in the southern part of the WSA. The projected vegetation treatment has been reduced to 600 acres in the Final EIS. Neither the Draft or the Final EIS contain a Partial Wilderness Alternative.

**32.7 COMMENT:** If there is a place where wilderness outweighs mineral development and this is such a place. Rated highly for wildlife, archaeological sites, among the canyons and cliff rims, this area is an important economic addition to Utah's biggest industry, the travel industry. We recommend Carcass Canyon, Devils Garden, and lands

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

linking them be designated wilderness. [Utah Wilderness Coalition]

**32.7 RESPONSE:** See the response to Specific Comment 32.4. Devils Garden is approximately 3 miles outside of the WSA boundary. The lands between Devils Garden and the Carcass Canyon WSA did not meet the wilderness inventory criteria, and therefore were not included in the WSA. The inventory phase has been completed, as explained in the response to General Comment 3.1.

**32.8 COMMENT:** The Alton coal field illustrates many of the problems inherent in developing southern Utah coal. Part of this field was designated unsuitable for strip mining by the U.S. Office of Surface Mining, owing to severe environmental constraints, including adverse impacts on visual resources, hydrologic impacts, and difficult revegetation. The latter problem is significant; Federal law prohibits surface coal mining in areas where native vegetation communities cannot be reestablished and maintained. Throughout southern Utah, but particularly in the severe climates and thin soils of wildland areas, revegetation may well be a fantasy. [Utah Wilderness Coalition]

**32.8 RESPONSE:** See the response to Specific Comment 26.27.

**32.9 COMMENT:** Based upon drilling success by Exxon in the Salt Wash Member of the Morrison Formation (or equivalent), there may be potential for 1 million lb plus uranium deposits at grades greater than 0.07 percent  $U_3O_8$  in the WSA; however, a considerable increase in uranium price would be necessary in order to stimulate exploration. The OIR of 3+ may be too high if the oil and gas potential is low. [State of Utah]

**32.9 RESPONSE:** The uranium potential is recognized in the EIS. It is expected that without wilderness, future exploration for uranium would occur; however, the EIS does project that commercial extraction would occur. OIR ratings have been deleted for the Final EIS. See the response to General Comment 15.7.

**32.10 COMMENT:** Of the known mineral resources contained within this study area, coal reserves by far outweigh other mineral deposits. One hundred thirty-three (133) mineral claims are registered with the BLM and are considered valid existing rights. Mineral rating is very high, at f4 for favorability and c4 for certainty. Again, this rating system was given by the Department of Energy/SAI and does not reflect input from

the USGS nor the USBM, who are required to submit separate and independent reports. Their reports are not available at this writing and comment period, and UP&L and other commentators are prejudiced by having to comment separately on the Draft EIS and the mineral reports. Part of Utah Power & Light Company's Federal coal lease U-1362 lies within this WSA. [Utah Power and Light]

**32.10 RESPONSE:** Coal is the predominate mineral resource in the WSA. All minerals information has been reviewed and updated for the Final EIS. Some minerals reports will not be completed until after publication of the Final EIS, and these of necessity must be reviewed separately. Portions of the Final EIS may be amended if new minerals reports contain significantly different new information. For coal this is unlikely because other resources are already known to exist as reported in the EIS.

**32.11 COMMENT:** A previous BLM report claimed that 25,900 acres are within Doelling and Graham's (1972) workable coal area within the WSA and maintains that approximately 115 to 175 million tons is mineable. BLM claims that only 4,710 acres would receive surface disturbance. BLM produces no description of the methods used to arrive at this acreage. We request that they do. We also request maps showing the areas that BLM proposed to be impacted. These maps exist since they needed to be produced to make these acreage estimates. BLM claims that 200 million tons of coal would be produced. BLM needs to explain the methods they used in determining this quantity. It is twice as high as the low estimate given by Doelling and Graham. [Utah Wilderness Coalition]

**32.11 RESPONSE:** Appendix 10 in the Draft and Final EIS explains the basis for the surface disturbance from projected mineral activities. The coal in the Carcass Canyon WSA would be accessed by underground methods, which do not require that all surface acres be disturbed. Surface disturbance for underground mining would focus on access roads, portals, air shafts, office and shop buildings, and loadout facilities. It is projected that each surface facility site, including access roads, would occupy up to 20 acres. Most likely the majority of the surface disturbance from coal mining would occur in the canyons and at the base of cliffs. The WSA contains an estimated 55 billion tons of in-place

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

resource which is in line with the estimate given by Doelling and Graham.

**32.12 COMMENT:** While coal is present in the area, BLM does not address the key issues in coal development. BLM failed to consider underground coal mining which would not affect surface or water resources. Almost all the coal qualifying for extraction could be taken out with mine access on the border or outside the WSA, resulting in no surface disturbances. BLM did not consider mining methods that would not disturb wilderness resources, and thus would not conflict with wilderness designation of this area. We request that consideration be given for a partial wilderness area, which would assume underground mining of coal. [Utah Wilderness Coalition]

**32.12 RESPONSE:** Since nearly all of the WSA is underlain by the coal resource, it is not practical to formulate a Partial Wilderness Alternative that eliminates the conflict. Further, the approximately 4,000 acres which have no coal are located in a very narrow band along the eastern edge of the WSA in a configuration which would not lend itself to wilderness management. Even though coal could possibly be accessed from outside the WSA, the coal under the area could not be leased following wilderness designation.

**32.13 COMMENT:** The Draft EIS gives 10,896 acres as leased before FLMPA for oil and gas, and 13,100 acres as leased before FLMPA for coal. The Draft EIS, however, does not provide a map to show the location of those leases. [Utah Wilderness Coalition]

**32.13 RESPONSE:** The lease figures and the related narrative have been updated for the Final EIS. BLM does not believe that a lease map is necessary for the EIS. The location of the leases may be readily obtained from plat maps and other records available to the public.

**32.14 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. WSAs 22, 23, 28, and 32 are situated in the Kaiparowits Basin of south-central Utah. The hydrocarbon potential of this basin is relatively unexplored, since only a few test wells have been drilled in the area. One large oil field, Upper Valley, has been discovered in the basin, and it is reasonable to believe that other hydrocarbon accumulations exist in sedimentary rocks of Paleozoic geologic age. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our con-

cerns and interests in the resource potential of these areas. [Texaco Inc.]

**32.14 RESPONSE:** See the response to Specific Comment 28.16.

**32.15 COMMENT:** The agency's main objection to wilderness designation is the existence of hydrocarbons in the WSA. While the analysis recognizes that the deposits of coal, estimated by the Bureau at less than 1 billion tons, cannot be extracted and/or transported from the region profitably at least in the near future, BLM concludes that wilderness designation would foreclose hydrocarbon development in the future. BLM did describe the many problems with coal development that make production extremely difficult. This needs to be carried further to determine whether the wilderness values lost outweigh the coal development benefits. With the many restrictions which must be required to protect other resources, benefits from coal development would be greatly reduced; other sources exist to meet energy needs. The wilderness values are high and cannot be found elsewhere. [Utah Wilderness Coalition]

**32.15 RESPONSE:** See the responses to Specific Comments 26.24, 26.25, and 26.26, and General Comments 15.43, 22.3, and 24.9.

**32.16 COMMENT:** The reference to the loss of livestock reservoirs as having a "negative impact on wildlife" is broad and unsubstantiated. [Scott Mills]

**32.16 RESPONSE:** Wildlife in many locations in the arid west utilize water from livestock reservoirs. Where water is lacking, the absence of such reservoirs would have a negative effect on potential use by wildlife. See the response to General Comment 16.12.

**32.17 COMMENT:** Chainings are favored by BLM. BLM is proposing range destruction in the eastern part of the WSA. Here more information is needed. A cost-benefit analysis is needed to prove that the project produces net benefits that outweigh the wilderness values lost. This analysis is missing from the Draft EIS and we request it to be made. BLM needs to discuss the alternatives to this range project that would offer range benefits to the permittees. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

**32.17 RESPONSE:** Chainings in the area are analyzed in the Kanab-Escalante Livestock Grazing Management EIS (USDI, BLM, 1980a). It is unnecessary to repeat that information in the Utah Statewide Wilderness EIS. Also, see the response to General Comment 24.5.

**32.18 COMMENT:** The visual resource has been downgraded to a ridiculous level, even though "the major visual resource of the WSA is the Straight Cliffs which constitute a landmark in southern Utah" rising 2,000 feet above the Escalante Valley floor. They were not given a Class A scenic quality rating and all of the WSA has a Class IV VRM classification. The reason the Straight Cliffs are VRM Class IV is stated under "coal": "Portal location ideally would be situated at the base of the Straight Cliffs . . ." An obvious case of mineral values determining the scenic quality and VRM ratings. The only way a Cedar City District WSA can receive decent scenic quality and VRM classifications is through a lack of mineral values. According to the EIS, the Kaiparowits coal is not economically or environmentally feasible to mine, yet it is the reason for denying this WSA a wilderness recommendation. [Owen Severance]

**32.18 RESPONSE:** Scenic quality and VRM ratings were determined in the Escalante MFP (BLM, 1981). The MFP visual resources evaluation was contracted to Ray Mann Associates, who followed the procedures set forth in the BLM manual. Although the MFP does not rate any part of the WSA as Class A scenic quality, the Straight Cliffs are considered to be a scenic "special feature" in the wilderness study. The Straight Cliffs comprise about 2,400 acres of the WSA.

**32.19 COMMENT:** This WSA contains important scientific fossil sites which will best be protected through wilderness designation. Throughout the study area, there are significant scenic views which not only add to the naturalness of the area but also to the surrounding integral vistas. [Sierra Club, Cache Group]

**32.19 RESPONSE:** The Straight Cliffs contain a horizon of pelecypod coquina in Cretaceous Dakota Formation and a horizon of Sciponoceras gracile in overlying Cretaceous shale. Although external molds of an ammonite, Collignonocera sp. are locally abundant within the S. gracile zone of the WSA, both horizons crop out persistently along the entire fringe of the Kaiparowits Plateau. (Carter and Sargent, 1983). The fossil sites are not considered to be an important special feature of the WSA because they are not restricted to the WSA and are abundant elsewhere.

Other than the Straight Cliffs, the scenic attributes of the WSA are similar to many other parts of the region. See the response to Specific Comment 32.18.

**32.20 COMMENT:** Carcass Canyon WSA was ranked low in wilderness quality and high for coal conflict. There are important cultural values that may need recognition. The density of cultural resources in the WSA is moderate to high through the Escalante Rim area and the area south of Right Hand Collet Canyon. [State of Utah]

**32.20 RESPONSE:** An estimated site density of 190 sites per 23,000 acres was computed for the WSA as a whole. Site densities may be substantially greater in the southern portion of the unit. All sites will continue to be protected by existing antiquities laws regardless of wilderness designation. See the analysis of the No Action/No Wilderness and All Wilderness Alternatives for a discussion of vandalism opportunities. Also, see the responses to General Comments 9.6 and 20.2.

**32.21 COMMENT:** Wilderness designation would better protect cultural resources. [Sierra Club, Cache Group]

a. BLM should note the important Anasazi archaeological sites that are present in this site. The complete designation of wilderness as proposed by the Utah Wilderness Coalition will better protect these national treasures. The Anasazi sites face constant threats from immediate vehicle access and potential development projects and corridors. Wilderness designation for Carcass Canyon also would protect spectacular Metate Arch.

b. Wilderness designation for Carcass Canyon would protect Metate Arch as proposed by the UWC. Important Anasazi archaeological sites are present in this site. The complete designation of wilderness as proposed by the Utah Wilderness Coalition will better protect these national treasures. The Anasazi sites face constant threats from immediate vehicle access and potential development projects and corridors. Only wilderness designation protects these sites. We strongly feel that the coal reserves listed for this area have been overweighed compared to its unique and outstanding wilderness qualities.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

**32.21 RESPONSE:** See the response to Specific Comment 32.20. Metate Arch is in the Devils Garden ISA, and it is not within or adjacent to the Carcass Canyon WSA. See the response to Specific Comment 32.7. Also, see the responses to General Comments 20.1 through 20.4 for additional details.

**32.22 COMMENT:** Increased interest in backcountry experiences has given rise to numbers of backpackers using Escalante and its surroundings. But, overwhelmingly, the major backpacking attraction in this area remains the Escalante River drainage and Water Pocket Fold. Both areas are managed under special legislative protection. Because of the existing preference for the Escalante River and Water Pocket Fold (regardless of whether or not Carcass Canyon WSA becomes a wilderness area), wilderness users will have little interest in this area. It is duplicative of some of the other proposed wilderness areas which do not have such outstanding mineral development potential. [Utah Power and Light]

**32.22 RESPONSE:** BLM estimates that the Carcass Canyon WSA receives less than 100 recreation visitor days per year. This compares to over 25,000 recreation visitor days per year for the Escalante River Canyon. However, diversity is not the only criterion. See the response to General Comment 8.22.

**32.23 COMMENT:** One of the critical BLM arguments found in error is in the current recommendation of unsuitable for designation. The IBLA found that BLM falsely had confused outstanding vegetative and topographic screening with outstanding opportunity for solitude. The IBLA stated that additional factors need to be considered. As a result, BLM designated part of Carcass Canyon as a study area. The picnic grounds form an excellent trail head for extended wilderness trips into the rest of the Carcass Canyon area. BLM falsely limited analysis to a small area of 10 acres, missing the whole roadless area. Because of this, BLM arrived at the wrong conclusion concerning wilderness values. [Utah Wilderness Coalition]

**32.23 RESPONSE:** The inventory phase is completed. Those that did not agree with BLM determination to exclude 12,180 acres between the Straight Cliffs and Hole-in-the-Rock Road appealed that decision. The Interior Board of Land Appeals (IBLA) reviewed and affirmed the decision that no outstanding opportunities for primitive recreation existed in the appealed area, but directed BLM to reassess the solitude opportunities based on the interrelationship of size, screening, configuration, and other factors. The remand reassess-

ment confirmed the original BLM findings, and this reassessment was affirmed by the IBLA upon a second appeal.

**32.24 COMMENT:** At the foot of the Kaiparowits Plateau, in rolling terrain, lies a unique eroded stone formation in Devils Garden. The Carcass Canyon roadless area abuts three sides of this natural area. This natural area should be studied with Carcass Canyon for wilderness suitability. We recommend that this natural area and the adjoining roadless area be designated wilderness. [Utah Wilderness Coalition]

**32.24 RESPONSE:** See the response to Specific Comment 32.7. On November 3, 1984, the Devils Garden ISA was reported by the Secretary of the Interior to the President as nonsuitable for wilderness designation. The President recommended the ISA as nonsuitable to Congress on April 26, 1985. Congress has not acted to designate or release the ISA.

**32.25 COMMENT:** BLM's hatchet job on this WSA is one of the most blatant examples in the Draft EIS of mineral values determining the wilderness and scenic values of a WSA. If no coal were present, BLM's evaluation of the WSA would be entirely different. Just look at the adjacent Fifty-Mile Mountain WSA evaluation where coal is not present in large quantities. I disagree with the Draft EIS that only 57 percent of the WSA meets the requirements for outstanding solitude. Once again "screening" was the only factor used to determine solitude. I also disagree that only 25 percent of the WSA has outstanding opportunities for primitive recreation. The method used to determine the area with outstanding opportunities doesn't make sense. If Carcass Canyon has 43 miles of canyons and those canyons have an average width (conservatively) of 0.5 mile at the rim, then Carcass Canyon alone has over 14,000 acres that meet the outstanding requirement. According to the map, the Carcass Canyon drainage covers at least 36 square miles, not the 15 square miles stated in the EIS. Left Hand Collet Canyon isn't even mentioned. [Owen Severance]

**32.25 RESPONSE:** See the responses to Specific Comments 24.43, 26.47, and 26.51 regarding the determination of outstanding opportunities for solitude and primitive recreation. BLM has determined that the 57-percent and 25-percent figures are reasonable estimates to describe the extent of the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

wilderness characteristics (outstanding solitude and outstanding primitive recreation) for the Carcass Canyon WSA. The drainage basin of Carcass Canyon has been remeasured. The figure of about 15 square miles as stated in the EIS is correct.

**32.26 COMMENT:** BLM's assessment of opportunities for solitude are wrong. [Kim Jennyson and Utah Wilderness Coalition]

a. BLM again and again analyzes solitude by the amount of vegetative and topographic screening which occurs. Solitude is not determined by screening solely, but according to the definition, is a matter of degree of remoteness and lack of habitation. The entire unit qualifies with this definition. The maze of canyons allows for a variety of outstanding primitive and unconfined recreational opportunities, including dayhiking, exploring, backpacking, photographing, drawing, and geologic sightseeing.

b. BLM's claim that 50 percent of the unit lacks outstanding opportunities for solitude bares no resemblance to reality. Consider this using BLM's own data contained in the Draft EIS. There are less than 100 visitor days of recreation in the WSA. There is no mineral activity and virtually no grazing activity (196 AUMs) occurring in the WSA. Therefore, if an individual could cover every acre of the WSA each day, he would, on average, encounter another person every 4 days! To deny this entire area lacks outstanding opportunities for solitude is to use a definition of solitude we are totally unaware of! Solitude must be judged on reality; what and how this area is likely to be used, not on whether you could avoid others if thousands converged on the area at once.

**32.26 RESPONSE:** See the response to Specific Comment 32.25. Solitude has been judged on the existing conditions and on the potential conditions that may exist with wilderness designation and wilderness management. Of particular importance are the intrinsic factors which provide solitude. For Carcass Canyon, it was determined that the greatest opportunities for solitude occur where both natural screening and topographic relief occur together, which limits line of sight and open vistas to other parts of the WSA. These locations are the drainages of Right Hand Collet Canyon, Left Hand Collet Canyon, Carcass Canyon, Cay Canyon, and another area of Willard Canyon.

**32.27 COMMENT:** The numerous roads, ways, and exploration sites lessen the visual quality and solitude

necessary for wilderness experiences in the WSA. [Utah Power and Light]

**32.27 RESPONSE:** The intrusions in the WSA are noted in the EIS in the paragraph on Naturalness. Intrusions are 2.5 miles of fence, nine spring developments, one corral, and 5 miles of ways. There are no roads or exploration sites in the Carcass Canyon WSA. Intrusions have been recognized and considered by BLM in determining naturalness and other wilderness aspects.

**32.28 COMMENT:** The Draft EIS fails to identify where the acreage is that fails to meet the wilderness standards. The subjective, negative analysis is apparent in this unit, i.e., an arch can be extremely beautiful as are arches in other areas. [Kim Jennyson]

**32.28 RESPONSE:** The EIS narrative describes where the outstanding wilderness characteristics occur. BLM does not consider them to be outstanding except as described. Phrases that might appear subjective have been eliminated.

The evaluation of special features is based on an assessment of estimated abundance or importance of a value to the area. In this instance, the arch is rather common in shape and relatively small in size when compared to other arches in the region. The arch actually is a natural bridge measuring 400 feet wide at base, 27 feet high, and 2 feet thick, with a 13-foot ring. The opening behind the bridge is 7.5 feet (Carter and Sargent, 1983).

**32.29 COMMENT:** The Draft EIS explanation that only 25 percent of the unit has outstanding opportunities for primitive recreation is absurd. It recognizes that the many canyons and the Straight Cliffs and Escalante Rim provide outstanding opportunities. One glance at a map will show that these features are found throughout the WSA. Apparently BLM feels only the canyon bottoms and not the narrow, forested mesas dividing them provide outstanding primitive recreation opportunities. These narrow mesas provide outstanding vistas and hiking routes. They provide navigable routes between canyons and to adjacent WSAs. They are an integral part of the area and cannot be looked at in isolation. [Utah Wilderness Association]

**32.29 RESPONSE:** The majority of the recreation use in the region focuses on the canyon areas

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

because of the natural attraction of water, riparian vegetation, shade, and diverse topographic interest. In the Carcass Canyon portion of the WSA, the ridge and canyon dissection is so severe that both the canyons and the narrow ridges are included as a unit in providing outstanding opportunities.

**32.30 COMMENT:** BLM uses the arbitrary rating system for outstanding wilderness characteristics discussed in our general comments. There is no methodology given and the recommendations appear arbitrary. Many of the most scenic cliffs in the area are recommended nonwilderness even though they have the highest scenic qualities. [Utah Wilderness Coalition]

**32.30 RESPONSE:** See the response to General Comment 22.3. An arbitrary rating system was not used. This was explained in response to comments 253 and 313 in Volume I, Appendix 2, of the Draft EIS.

**32.31 COMMENT:** The Dixie National Forest concurs with the proposed wilderness in areas 29 and 30, and also with the recommendation to not propose wilderness in areas 12, 22, 23, 24, and 32. [U.S. Forest Service, Intermountain Region]

**32.31 RESPONSE:** The comment is noted. The Carcass Canyon WSA (area 32) does not border the Dixie National Forest.

**32.32 COMMENT:** The preliminary recommendation is noted to be consistent with land use plans for Kane and Garfield Counties. As pointed out in the EIS, those counties have adopted policies against wilderness designations anywhere at any time. BLM is not bound to manage lands according to local plans which would ask BLM to violate the intent of FLMPA. Under those circumstances, BLM's consistency or inconsistency with these county plans can hardly be taken seriously as a factor or issue. BLM needs to show the conflict with the term "multiple use" which the county plans use. The county means every use on every acre. This conflicts with BLM organic act. BLM needs to describe how their legal requirements conflict with local plans. [Utah Wilderness Coalition]

**32.32 RESPONSE:** See the response to Specific Comment 25.23 and General Comment 23.8.

**32.33 COMMENT:** BLM claims that future transportation corridors pose conflicts with wilderness designation. In many cases large areas are deleted to accommodate such corridors. BLM provides no maps describing

the location of the proposed corridors for any of the wilderness study areas involved. In the case of Mud Springs, BLM claims a "future rail or coal slurry pipeline" would cross the area. BLM stated that the "Kaiparowits Coal Development and Transportation Study for Southern Utah" describes the proposal. The consultant who prepared this document offers only general conceptual ideas which describe broad areas where corridors may be proposed. The conceptual corridors are up to 15 miles wide, and six alternate routes are described. BLM uses this as the sole justification for deleting large parts or all of wilderness study areas from wilderness study. There are several problems with what BLM is proposing. The first is giving a consultant's report the status and weight of a land use plan. The report has not gone through the planning process nor had an EIS prepared on it. It has not complied with BLM's procedures for the designation and management of rights-of-ways. The public has had no opportunity for participation. For these reasons, this document cannot be considered a land use planning document and should be subject to general comments from the public. A utility corridor 15 miles wide is an absurdity. It represents nothing more than the effort by interested parties to keep every option open. That is understandable. What is difficult to understand is BLM's use of such a "wish list" as a serious proposal sufficient to disqualify an area for wilderness. BLM has demonstrated no need for these corridors. There has been no justification for any--much less all--of these provided to the public. BLM's decision to use the corridors as real conflicts is arbitrary. It is not supported by BLM's planning process. BLM falsely states the potential for corridor designation and the amount of land the corridor would occupy. BLM should apply each of the required criteria when considering transportation corridors (43 CFR 2806.1) in the wilderness study. We ask that BLM describe how the criteria have been used as well as which have not been used. A majority of the corridors proposed could be served with existing rights-of-ways. BLM fails to describe the current rights-of-way, their present use, their capacity, and the feasibility of using them for additional facilities. Common sense requires such an evaluation. We recommend that BLM drop transportation corridors as a wilderness conflict in the EIS unless the analysis described above is performed. To be fair, BLM must give equal weight to wilderness values and to proposals for commercial uses. Apparently pre-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 32: CARCASS CANYON WSA (CONTINUED)**

existing development proposals were give precedence. [Utah Wilderness Coalition]

**32.33 RESPONSE:** See the response to Specific Comment 25.24.

**32.34 COMMENT:** A legend should be included for the split estate on Map 1. [State of Utah]

**32.34 RESPONSE:** The map and legend have been re-done to include split estate.

**SECTION 33**  
**SCORPION WSA**

**33.1 COMMENT:** In the inventory, BLM deleted part of the area that deserved study. WSA boundaries were chosen to exclude the impacted parts of roadless areas. In this case BLM chose a 6-mile straight line along section lines. The nearest impact is between 1 and 2 miles to the south. According to the inventory, the wilderness boundary should be along the edge of impacts. This bench is an important wildlife habitat needing wilderness protection. [Utah Wilderness Coalition]

**33.1 RESPONSE:** See the responses to General Comments 3.1 and 16.1.

**33.2 COMMENT:** The Scorpion WSA is an integral part of the experience of hiking the canyons to the east of the Escalante River. Many routes cross through this area. Reviewing the summary of environmental consequences, the only major conflict with All Wilderness designation is one water project. A far smaller deletion could still accomplish this project. A larger Partial Wilderness Alternative should be considered in the Final EIS. [John Veranth]

**33.2 RESPONSE:** The Partial Wilderness Alternative for the Final EIS has been increased by 5,358 acres.

**33.3 COMMENT:** Although we understand the technical rationale for splitting the Escalante Area into five separate ISAs and WSAs, the analysis should consider these areas as a complex of tracts that would preserve substantially all of the Escalante drainage stretching from the proposed Forest Service WSA on the Aquarius Plateau to the Glen Canyon NRA and the confluences with the Colorado River. [Neal Berg]

**33.3 RESPONSE:** See the response to Specific Comment 29.1.

**33.4 COMMENT:** The Draft uses wilderness manageability as a factor in boundary adjustments on context. This is an admirable tactic, though how does one intend to enforce wilderness restrictions on public land where terrain has historically dictated whether or not wheeled vehicles or livestock will work? In my opinion much of these lands can be adequately managed by their own geographic or topographic restraints. By drawing boundaries as those proposed in the Scorpion or North Escalante Canyon, further administrative problems may result from isolated managing fragments. State sections should not be used in promoting a nonwilderness recommendation. [Bruce Chesler]

**33.4 RESPONSE:** BLM policy requires that manageability be considered, and guidelines indicate that areas should not be recommended as wilderness if they cannot be managed effectively as such. The information in the Draft EIS has been revised to clarify the differences between manageability from a legal standpoint and administrative difficulty manageability consideration. State sections are excluded, where possible, as a matter of policy. See the responses to Specific Comment 26.2 and General Comments 6.4 and 8.23.

**33.5 COMMENT:** This area proposed to be dropped from wilderness designation has both outstanding (or, as BLM says, "most outstanding") solitude and recreation. The Draft EIS is accurate in the description of this. If you accept BLM's criterion for boundary recommendation, BLM's partial wilderness area conflicts with this criterion. [Utah Wilderness Association]

**33.5 RESPONSE:** The BLM Proposed Action in the Final EIS now includes 5,358 additional acres in the area formerly not included in the Proposed Action in the Draft EIS. BLM has determined that the southeastern portion of the WSA lacks outstanding opportunities for solitude and primitive recreation.

**33.6 COMMENT:** Plans to provide additional access points to the Escalante River ignore the fact that the canyons and benches people traverse to reach the Escalante are what the visitor often comes to see. What exists should not be diminished to provide quicker access to the Escalante River. [Utah Wilderness Association]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: CARCASS CANYON WSA (CONTINUED)**

**33.6 RESPONSE:** BLM has no plans to provide new road access through the Scorpion WSA to the Escalante River. Existing road access in the vicinity occurs on the western and southern borders of the WSA.

**33.7 COMMENT:** I disagree with the EIS where it says, "A trailhead at the terminus of the Egypt road leads to the Escalante River via Fence Canyon. Approximately 0.25 mile of this route within the WSA has been "cherry-stemmed." If the "cherry-stemmed" route of 0.25 mile length referred to is the trail, itself, at the end of the ordinary vehicle road, then I would protest strongly the decision to allow this to be "cherry-stemmed," thus allowing ORV access on the trail, itself. This trail cuts down steeply through picturesque sandstone and is subject to scarring even by the shod feet of the horse taken by the ranchers down to their stock in the Escalante River bottom. ORV use of this trail, even for 0.25 of a mile, would be very detrimental. All vehicular access should be stopped at the existing trailhead at the top of the bluff. The "cherry-stem" effect should go no farther than that. [Charles Bagley]

**33.7 RESPONSE:** The two sentences quoted in the comment are correct. The "cherry-stemmed" road ends at the existing trailhead register box and parking area. The trail down into the steep terrain is not part of the "cherry-stem."

**33.8 COMMENT:** Under the All Wilderness Alternative, seven State sections adjacent to the WSA are identified as likely to be acquired and four State sections are identified as not to be exchanged. However, these specific sections are not identified so it is impossible to know which sections fall in which category. [Rex and Judy Wells]

**33.8 RESPONSE:** The specific State sections were identified in Appendix 3 of the Draft EIS. The information and assumptions regarding State land have been fully revised in the Final EIS as a result of change in the State position. See the explanation in Chapter 1 in Volume I of the Final EIS and in the response to General Comment 6.3.

**33.9 COMMENT:** The Colorado Plateau has the finest desert scenery, and in greater abundance, than

any other place in the entire nation--and probably the world. People travel from all over the world to visit these incredibly scenic and remote lands. The plateau contains seven national parks and numerous national monuments. In this land of superlatives the Escalante River canyons are the most spectacular, the most beautiful, the most fun, the most popular and the most famous. The Escalante is the best of the best! These canyons are internationally acclaimed for their beauty, solitude, and unsurpassed recreation opportunities. These canyons are proven recreational assets, proven tourist attractions, proven (and undisputed) wilderness. Yet your agency is willing to sacrifice large chunks of Utah's prime wilderness jewel for an ephemeral short-term economic gain. I am shocked and appalled! [Scott Delong]

**33.9 RESPONSE:** The scenic attributes of the Scorpion WSA and related areas are recognized in the EIS. See Appendix 11 for a summary of rationale for the Proposed Action alternative.

**33.10 COMMENT:** Only the grassy flats in the southwest part of the WSA do not meet the wilderness requirements and are eliminated from my partial wilderness proposal (see map). The southern rim of the Dry Fork of Coyote Gulch should become the proposed wilderness boundary. There are no significant mineral conflicts in the WSA. The modified partial wilderness proposal as shown on the map should become BLM's Proposed Action. [Owen Severance]

**33.10 RESPONSE:** The BLM Proposed Action has been changed to a 14,978-acre partial alternative. It includes the upper (or western) portion of Dry Fork. BLM does not believe that the eastern part of the WSA (parts of Scorpion Flat, middle segment of Dry Fork, and Big Hollow Wash) contain outstanding opportunities for solitude and primitive recreation.

**33.11 COMMENT:** Why was the alternative chosen that increases potential conflicts with Glen Canyon NRA, while having little additional benefits for other governmental agencies? [Tim Graham]

**33.11 RESPONSE:** None of the alternative would increase conflicts with Glen Canyon NRA.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

**33.12 COMMENT:** I would like a more complete explanation of the rationale for decisions made concerning these and other similarly treated areas. In particular, why substantial acreages of some of the ISAs were deleted--if these areas are so unique that they merit ISA status, how can you cut out large chunks of them? North Escalante Canyon/The Gulch is a good example: 4,000 acres are included in BLM's recommendation, 98,000 acres meet your own narrow criteria for wilderness, why were 44,000 acres dropped? This is just one of many areas deleted, or chopped up with no valid explanations, at least in the scoping document. Please justify your actions. [Tim Graham]

**33.12 RESPONSE:** Scorpion is not an ISA. The rationale for the BLM Proposed Action is summarized in Appendix 11 in Volume I.

**33.13 COMMENT:** Based on the scoping document, it would appear that any possibility of resources is used to remove acres from consideration for wilderness. Scorpion WSA is a good example. It has 0 acres recommended for wilderness, with the only resource conflict being the possible presence of uranium along the eastern border. This border abuts the Glen Canyon NRA wilderness of Escalante Canyon and uranium did not seem to interfere with designation of this area. Other areas appear to have been treated similarly. [Tim Graham]

**33.13 RESPONSE:** The BLM Proposed Action for the Scorpion WSA in the Draft EIS was the 9,620-acre Partial Wilderness Alternative. That has been changed to a 14,978-acre Partial Wilderness Alternative. The rationale is based on wilderness qualities, not potential for conflicts with other resources.

**33.14 COMMENT:** In the Scorpion WSA, the EIS specifically identifies no significant adverse mineral impact for the All Wilderness Alternative. The only adverse impact identified is one potential livestock water development. Now, livestock water developments are important, but a water project can be accommodated without deleting 26,000 acres of high quality wilderness which is an integral part of the Escalante area. [John Veranth]

**33.14 RESPONSE:** See the response to Specific Comment 33.13.

**33.15 COMMENT:** The Proposed Action "includes all areas and acres currently judged by BLM to meet

the test of suitability. Units may have low wilderness values but no identified conflicts with other resources." I basically agree with this criteria, however, my comment is on how the criteria was applied. There are many areas where the Draft EIS identifies no conflicts with other resources which were not proposed for wilderness. These areas lack significant human imprints and are manageable as wilderness therefore by BLM's own criteria they should have been recommended. Specific examples include: the area between the road and the canyon rim in Mexican Mountain WSA, the entire Cedar Mountain range, large portions of the King Top WSA, the Cheesebox WSA, the south portion of the Scorpion WSA, much of Mount Pennell, etc. [John Veranth]

**33.15 RESPONSE:** The quoted narrative was incorrect in the Draft EIS. It has been revised and is no longer applicable. The BLM Proposed Action does omit certain areas with low wilderness values and no conflicts. Also, see the response to Specific Comment 26.51.

**33.16 COMMENT:** BLM's assessment of wilderness values is wrong. [Sierra Club, Cache Group; Gordon Swenson; and Scott Delong]

a. The eastern half of this WSA has many superb wilderness quality primitive recreation opportunities. BLM even says so in the EIS. For example: "The tributaries to . . . Dry Fork of Coyote Gulch exhibit concentrations of deep slots that are not equaled elsewhere in the Escalante River drainage. "Spooky Gulch and Brimstone Gulch . . . These canyons are intriguing and provide challenging photographic subjects. Because they are so narrow and tortuous, they are ideal canyons for an exploratory type of hiking." "The sightseeing and photographic opportunities in the Dry Fork of Coyote Gulch are of high quality . . . This is a small area with impressive scenic values." The above statements by BLM clearly show that this WSA meets the Wilderness Act's requirements. Likewise, other people have observed the unique character of this area. For example, the popular hiking guide book, "Hiking the Escalante," says "This exposed 5-mile cross country route should be tried only by the physically and mentally prepared . . . Orienteering your way across open slickrock brings you to a sand slide that allows access to a very scenic side canyon of the Escalante River" (Scorpion Gulch Hike). The recreational, natural and primitive characteristics of Scorpion WSA clearly outweigh the mineral values of potential uranium production, especially with the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

market value of uranium dropping. The demand for all uranium has fallen off. If the nation will need the small amount of expensive uranium in the future, then the President can open up the area, but until then, let the area be pre-served as wilderness. It is difficult to tell why BLM chopped this area. Can BLM justify its rationale?

b. The Scorpion WSA is spectacular and an integral part of the Escalante Complex. Yet you propose dropping almost the entire area from further wilderness consideration. Many of the trailheads for the most popular hikes in this region are located in the WSA. The Draft EIS even sings the praises of the very areas you propose to delete: "The tributaries to . . . the Dry Fork of Coyote Gulch exhibit concentrations of deep slots that are not equaled elsewhere in the Escalante River Drainage." ". . . Spooky Gulch and Brimstone Gulch; portions of upper Brimstone Gulch, and various sections of the Dry Fork exhibit some unique and highly aesthetic landscapes. These canyons are intriguing and provided challenging photographic subjects. Because they are so narrow and tortuous, they are ideal canyons for an exploratory type of hiking." "The Dry Fork provides backpacking access to Coyote Gulch and the Escalante River . . . The sightseeing and photographic opportunities in the Dry Fork of Coyote Gulch are of high quality . . . upper Brimstone Gulch-Cat Pasture . . . is an intricate and dissected area of colorful slickrock domes, short box canyons, and small buttes. This is a small area with impressive scenic values." Anyone who has ever hiked these areas, and there are a lot of us, will tell you that these are first-rate wilderness areas--first-rate scenery, first-rate recreational opportunities, first-rate solitude. These areas must be protected as wilderness. You recommend nonwilderness because there is a chance that there are uranium deposits in this area. The deposits are so overwhelming that there is not one uranium mining claim in the area--much less any commercial production of the mineral. This is world quality wilderness--even if there is a uranium deposit here, the area should still be designat-ed wilderness in its entirety.

c. Under BLM Proposed Action, several spectacular slot canyons, tributaries of the Dry Fork of Coyote Gulch, have been excluded from wilderness. These form the most scenic portion of the WSA, as well as the most difficult of access. Please explain the reasons for their exclusions.

**33.16 RESPONSE:** The Brimstone Gulch-Spooky Gulch-Cat Pasture area has been added to the BLM Proposed Action in the Final EIS.

**33.17 COMMENT:** Your Proposed Action Partial Wilderness Alternative would protect Twenty-Five Mile Wash but not Scorpion, and I don't understand this. There seems to be no logic to such a choice, certainly none expressed in the EIS, and the lack of any significant resource conflicts would lead me to believe that the All Wilderness Alternative here is just as reasonable as your Partial Wilderness Alternative. I feel that your EIS does make a better case for the All Wilderness Alternative, and this is the direction you should go. [Robert Hassell]

**33.17 RESPONSE:** The Brimstone Gulch-Spooky Gulch-Cat Pasture portion of the Scorpion area has been added to the BLM Proposed Action. The Scorpion flat area does not possess outstanding opportunities for solitude and primitive recreation.

**33.18 COMMENT:** The data for Scorpion presented in the Draft EIS appears to not support the recommended action; conflicts are minimal, the All Wilderness Alternative complements the NPS wilderness proposal in the Glen Canyon NRA, and the wilderness values seem to meet all qualifications of the Wilderness Act. One can only presume that the All Wilderness Alternative has been rejected solely on the grounds that the lack of perennial water in the Dry Fork of Coyote Gulch results in scenery that is judged to be "decidedly inferior" to that of the main fork. It is ironic indeed, that BLM chose to present a color photograph of this "decidedly inferior" scenery in the Introduction to Volume I as an example of the spectacular lands under BLM administration. Furthermore, the slot canyons of Spooky and Brimstone Gulches are only mentioned in passing, despite the fact that these are some of the best examples of this particular land feature and are more easily accessible than other occurrences in the area. [Neal Berg]

**33.18 RESPONSE:** See the responses to Specific Comments 33.13, 33.16, and 33.17. Lack of perennial water is not necessarily a determining factor in judging scenic quality; although, in general, the presence of water often adds interest and variety to the landscape.

**33.19 COMMENT:** In the geology narrative the Colorado Physiographic Province should probably read

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

Colorado Plateau Physiographic Province. [State of Utah]

**33.19 RESPONSE:** The correction has been made in the Final EIS.

**33.20 COMMENT:** The only other potential mineral resource within the WSA cited in the text is gypsum. "A small gypsum deposit of unknown quality and quantity outcrops in the northeast portion of the WSA. This deposit is presently unclaimed and is inferred to occur over a large area outside the WSA." If this known deposit were worth exploiting, it would have been claimed by now. Further, wilderness designation will have little effect on this deposit since the majority of the deposit occurs outside the area. [Doug Green]

**33.20 RESPONSE:** The EIS indicates that the extraction of gypsum from the Scorpion WSA is not expected, regardless of wilderness considerations.

**33.21 COMMENT:** My contention that the potential uranium reserves within Scorpion have been grossly overstated seems to be supported by the fact that no uranium mines, and indeed not even any claims, are found within the WSA. The text both prefaces ("No claims or prospects are known to exist in this WSA.") and concludes ("No mining claims occur within the WSA.") the discussion of uranium potential within the WSA by pointing this out. Given the furious activity surrounding the search for uranium in the last 40 years and the relative ease of access to the area compared with the isolation of many other producing sources, I believe that if there indeed were economically recoverable uranium within the area, mining claims and activity would have by now taken place. [Doug Green]

**33.21 RESPONSE:** The EIS indicates that uranium exploration or extraction activities are not expected in the Scorpion WSA, regardless of wilderness designation.

**33.22 COMMENT:** SAI rates the remaining 83 percent of the WSA, with a moderate degree of certainty (c3), as having low potential (f2) for additional sources of uranium (Table 3, page 12). The text states "The area assigned an f2 rating could contain up to 500 tons of uranium oxide at a forward cost of \$100 per lb." In the first place, this "low" favorability rating is given to a portion of the WSA containing a greater potential than the remaining area

which was given a "high" favorability. Given the average 1982 cost of uranium oxide at below \$30 per lb, the attempted recovery of this small percentage is worse than economically unsound, it's absolutely foolish! [Doug Green]

**33.22 RESPONSE:** The narrative in question has been revised and the cost figures deleted.

**33.23 COMMENT:** The Draft EIS has the usual tabular comparisons of the pros and cons of the various alternatives. The Mineral and Energy Resources section, as usual, receives excessive emphasis. All of the estimates throughout the document show that there is essentially no mineral or energy resources in here at all. The entire section under Mineral and Energy Resources should be labeled "not relevant." [Charles Bagley]

**33.23 RESPONSE:** All information presented in the EIS regarding mineral resources is relevant, even in areas where potential for mineral exploration and extraction may be low. The Final EIS indicates that mineral values are not an issue in the Scorpion WSA. See the response to General Comment 9.6.

**33.24 COMMENT:** One notable omission in the discussion of uranium potential is that the host formation (Chinle Formation) is 1500 to 2000 feet under the surface. This fact was noted in the Site Specific Analysis prepared in 1982. It seems to us that although the Chinle Formation may be favorable for uranium as claimed in the Draft EIS, this depth could make any development uneconomical. The fact that the likelihood of development is thought to be minimal is mentioned in the impacts section. Estimates of potential should include not only the amount of a resource present, but also the practicality of whether the resource could be developed. [Rex and Judy Wells]

**33.24 RESPONSE:** The Final EIS states that the WSA is not favorable for uranium resources or recovery.

**33.25 COMMENT:** We do not believe that presentation of a worst-case analysis is appropriate for mineral development in the No Action/No Wilderness Alternative. Based upon the low potentials for oil and gas and uranium, we believe the most likely situation would be no development of these resources and that the worst-case analysis is misleading and gives the impression of a conflict that does not really exist.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

Our statement is supported by the description of potentials in the Affected Environment section and statements under the All Wilderness Alternative impact section that there is a low likelihood of exploration and development activities for oil and gas and that it is unlikely that exploration and development for uranium will occur. Therefore, we think the worst-case situation, including the impacts to all other resources, should be deleted and the analysis should be based on the expected lack of future development. [Rex and Judy Wells]

**33.25 RESPONSE:** The Final EIS has been revised to replace the "worst-case" analysis with a No Action/No Wilderness scenario based on assumptions for reasonably expected extractions in the foreseeable future. See the responses to General Comments 9.6, 9.12, 15.20, and Appendix 6 in Volume I.

**33.26 COMMENT:** The discussion of mining claims in this alternative does not include the required validity examinations (Wilderness Management Policy page 26). [Rex and Judy Wells]

**33.26 RESPONSE:** See the response to General Comment 15.28.

**33.27 COMMENT:** The mineral resource conflict does not hold water. The entire estimate for uranium oxide is estimated as a small deposit and BLM admits "no uranium deposits are known to occur within the WSA." The EIS devotes considerable discussion to this matter and the only conclusion that can be drawn is that this is a very small, low value and low importance hypothetical resource. [Utah Wilderness Association]

**33.27 RESPONSE:** The EIS indicates no significant conflict with potential mineral exploration and/or development in the Scorpion WSA.

**33.28 COMMENT:** This WSA has an OIR rating of 2- (low) for minerals. The Draft EIS notes that the likelihood of mineral recovery from this WSA is "low." Therefore, the only possible reason for excluding most of the WSA is a skewed determination of wilderness values. UWA recommends the All Wilderness Alternative for this area (it closely coincides with the UWA proposal). [Utah Wilderness Association]

**33.28 RESPONSE:** See the response to Specific Comment 33.13.

**33.29 COMMENT:** The figures given in Table 3 under "estimated resource" for uranium are confused and misleading when compared with the figures in the text under the heading uranium. Also the choice of wording in the text is misleading and can create false impressions concerning the true extent and value of possible uranium deposits within the WSA. Because of the imprecise wording, careful reading of the text is required to uncover the true situation. [Doug Green]

**33.29 RESPONSE:** The table and the text have been revised and clarified.

**33.30 COMMENT:** The SAI estimates for uranium potential in the WSA appear to be taken from Department of Energy sources concerning the Greater Circle Cliffs probable resource area. The Draft EIS states that "The U.S. DOE (1983) has estimated that the Greater Circle Cliffs probable resource area has a 50-percent probability to contain about 6,400 tons of uranium oxide." Please Note: This figure is for the entire probable resource area, as the text clearly states, and not for the Scorpion WSA as Table 3 certainly seems to infer. [Doug Green]

**33.30 RESPONSE:** Table 3 has been clarified.

**33.31 COMMENT:** Scorpion WSA is considered to have relatively low quality wilderness values and low conflicts compared with other WSAs in this part of the region. Of conflicts present, the proposed 9,620-acre partial alternative eliminates any conflict with uranium in the Greater Circle Cliffs Favorable Area. The proposed partial alternative would allow development of at least 6,400 tons of uranium. Gas company reports have indicated that the WSA has high potential for economic accumulations of oil and gas. [State of Utah]

**33.31 RESPONSE:** See the response to Specific Comment 33.30. BLM has determined that the Scorpion WSA has a relatively low potential for oil and gas development.

**33.32 COMMENT:** Six thousand tons of uranium may sound like a lot, but actually it isn't. According to figures cited in "Energy and Problems of Technical Society" by the physicists Jack J. Kraushaar and Robert A. Ristinen (John Wiley & Sons, 1984), "Various estimates put the number of tons of unenriched  $U_3O_8$  uranium oxide in the range of 2.4 to 2.9 million, if ore classified as speculative is not included" (page 112). Use the more pessimistic figure

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 33: SCORPION WSA (CONTINUED)

of 2,400,000 tons. The entire Greater Circle Cliffs favorable uranium area contains 1,126 square miles, which converts to 720,640 acres. The text states that, according to the DOE, only "about 6,180 acres"-or 17 percent of Scorpion--like within this 720,640 acre probable resource area. This means that only 0.84 percent (as the text says, "less than 1 percent") of the entire Greater Circle Cliffs favorable area is contained within the Scorpion WSA. Combining these figures gives the true picture of the uranium potential inside Scorpion. If 0.84 percent of the entire favorable area is within Scorpion, and assuming the DOE's figure of 6,400 tons uranium for the entire favorable area is accurate, then there are actually 53.7 tons of uranium within 17 percent of Scorpion's boundaries. This represents a truly minuscule fraction of national reserves, approximately 0.00224 percent, or a two-hundred-twenty-four-hundred-thousandths fraction of the nation's potential. This is absolutely negligible. [Doug Green]

**33.32 RESPONSE:** See the responses to Specific Comments 33.13, 33.21, 33.27, 33.29, and 33.30. The Final EIS portrays the low significance of the WSA for potential uranium resources.

**33.33 COMMENT:** BLM also violates its own rules in assigning favorability and certainty ratings for the Scorpion WSA. In Vol. I, Appendix 5, p. 336, "Specific Criteria Used to Derive Levels of Favorability and Certainty for Uranium Resources," the Draft EIS states "Tracts assigned on f4 rating are within a geologic environment favorable for uranium resources in excess of 1,000 tons of uranium oxide." Referring back to the DOE's figure of 6,400 tons for the entire GCC and using 33.7 tons as the portion of the total within the WSA, it is apparent that a favorability rating of f4 or even f3 is not justified for the Scorpion WSA because of the small total amount available. Similarly, the assigning of a c3 certainty rating is unjustified. The Draft EIS states in Vol. I, Appendix 5, p. 337, "c3: Visible occurrence of uranium minerals, prospects, a mine, or assays from within or near the tract must be identified in order to assign a tract a certainty rating of c3. Uranium assays of core samples taken in the vicinity of the tract from several exploration holes, or a cluster of anomalously high uranium values from geochemical samples, would be evidenced for a C3 rating." Nowhere in the Draft EIS is there any mention of the above. In fact, the Draft EIS supports my contention that uranium reserves in the Scorpion WSA are insignificant, when it states: "No claims or prospects

are known to exist in this WSA" and "No mining claims occur within the WSA." "Due to the low likelihood of recovery of these minerals, however, the loss of development opportunity would not be significant." "Because production of this metal is not currently occurring and because economic considerations (e.g. transportation, low potential, etc.) are unfavorable, it is unlikely that exploration or development will occur. Therefore the alternative "(all wilderness)" would not result in any significant loss of recoverable uranium." Given the intense search for uranium that has occurred in the area along with the relative ease of access to the WSA, the fact that no mines or even claims exist in the WSA is itself testimony that there are no large, valuable deposits of uranium in the WSA. If there were, I believe that claims would have been staked and mining activity would by now have taken place. [Wayne King]

**33.33 RESPONSE:** See the responses to Specific Comments 33.21 and 33.30.

**33.34 COMMENT:** This area contains important wildlife habitat for mountain lions and the threatened peregrine falcon which will best be protected through wilderness designation. [Sierra Club, Cache Group]

**33.34 RESPONSE:** The presence of cougar (mountain lion) and peregrine falcon are noted under Wildlife in the Affected Environment section of the EIS.

**33.35 COMMENT:** As in the North Escalante Canyons ISA, there is no mention in the Draft EIS of the peregrine falcon pair found in Long Canyon. Why is there this omission? [Utah Wilderness Association]

**33.35 RESPONSE:** See the response to Specific Comment 30.27.

**33.36 COMMENT:** BLM lists the number of raptors present in the WSA. The specific species should be listed and accompanied by brief descriptions of particular habitat requirements. [Scott Mills]

**33.36 RESPONSE:** See the response to Specific Comment 26.39.

**33.37 COMMENT:** These WSAs have riparian habitat. The impacts of the alternatives on this habitat are not analyzed. [Scott Mills]

**33.37 RESPONSE:** See the response to Specific Comment 29.16.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

**33.38 COMMENT:** Desert bighorn sheep frequent Twenty-Five Mile Wash. [State of Utah]

**33.38 RESPONSE:** According to BLM records, there is only one documented sighting of bighorn sheep in Twenty-Five Mile Wash. This sighting was made in 1984.

**33.39 COMMENT:** The discussion on forest products states that noncommercial gathering of dead-and-down wood would be allowed. The Wilderness Management Policy (Page 17) states that trees, shrubs, and other vegetative products will not be sold or cut for nonwilderness purposes, except for valid mining claims and under emergency conditions. Fuel wood cutting for campsites or cooking fires may be permitted, but harvest of wood for other purposes, such as home heating, could not be allowed. [Rex and Judy Wells]

**33.39 RESPONSE:** See the response to Specific Comment 29.35.

**33.40 COMMENT:** The amounts from livestock sales and rancher's returns to labor and investment are the same as identified under the No Action/No Wilderness Alternative. Therefore, the proposed improvements that would be foregone would not cause a significant impact. We would also question whether the improvements are really necessary since they do not appear to provide a positive return. [Rex and Judy Wells]

**33.40 RESPONSE:** See the response to Specific Comment 31.69.

**33.41 COMMENT:** We do not understand why the average actual livestock use and the revenues generated from grazing in the ISA are unknown. Permittees are required to submit actual use figures to BLM and are billed accordingly. [Rex and Judy Wells]

**33.41 RESPONSE:** See the response to Specific Comment 29.37.

**33.42 COMMENT:** The analysis of the impacts of the All Wilderness Alternative on future range developments is different than presented for other WSAs. For example, in the Phipps-Death Hollow ISA it was assumed 2 miles of fence could be constructed to meet wilderness management criteria, yet in this WSA it is stated the impact on 0.75 miles of fence is unknown. In the North Escalante Canyons/The Gulch

ISA, it was assumed a pipeline and storage tank would likely not be allowed, but the impact of similar features at Scorpion is unknown. [Rex and Judy Wells]

**33.42 RESPONSE:** The analysis for this WSA has been corrected to be consistent with other WSAs. Generally vegetation treatments and reservoirs would not be compatible with wilderness management, but fences and pipelines would be allowed if designed to meet wilderness criteria.

**33.43 COMMENT:** Partial Wilderness Alternative: In the Description of Alternatives under the All Wilderness Alternative, it indicates that there are 2,496 AUMs in the WSA. Under the Partial Wilderness Alternative, it indicates that there are 380 AUMs within this partial designation. Yet under the Environmental Consequences of Alternatives discussion it identifies 9,700 as the partial designation, with 261 AUMs in this designated area. Both the acreage and the AUMs appear to be in error. Which are the correct figures? [State of Utah]

**33.43 RESPONSE:** All of the figures have been revised as a result of the increase in the size of the partial alternative.

**33.44 COMMENT:** Many ranchers express fears of wilderness designation because of a perceived negative impact on their livelihood. These ranchers are honest, hardworking people, and are justified in having concerns about the effect of wilderness designation on their lives. Their worries fall into two general classes: one, they are afraid that wilderness designation will prevent them from vehicular access when needed; and two, they see wilderness as preventing them from making rangeland developments, especially concerning water. In response I must point out that the law is quite explicit and clear. The designation of wilderness will have minimal, if any, impact on current cattle operations. The BLM Wilderness Management Policy, Chapter III, "Guidelines for Specific Activities" (reprinted in the Draft EIS Appendix 1 in Volume I, Part A, Section III. H. Rangeland Management) takes its wording verbatim from the U.S. House Report 96-1126. It is clear that the intention of both Congress and BLM is not to adversely effect the ranching community via wilderness designation. Indeed, the designation of wilderness areas can be of long-term benefit to the ranching community due to "potential natural vegetation (PNV) . . . ." This biological potential should be of utmost importance to the local rancher because it is the determining factor

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

in the long-term carrying capacity of the land. Ranching is one of the ultimate long-term human activities, carried on over the course of generations. Many of the ranches in southern Utah are being run by the same families who established them three and four generations ago. The origin of BLM itself is grounded in the long-term management of rangeland, to ensure wise use and prevent destruction practices such as overgrazing. It is through study of areas in their natural condition that the long-term ability of the land to support human activities, such as ranching, can be determined. In this regard, reserving portions of the land for study in its natural state can benefit the ranching community by determining the ability of similar areas to support developments over the long term of years, and generations. [Doug Green]

**33.44 RESPONSE:** In general, wilderness designation would not significantly affect existing amounts and patterns of livestock grazing. Rancher access by vehicles would be limited to only that necessary for livestock operations. Wilderness designation would limit the opportunity to increase future grazing use dependent on new vegetation treatments (such as chainings) and construction of new reservoirs, in those areas which may be feasible for such projects; however, there are no feasible locations in the Scorpion WSA. Wilderness designation would not prevent installation of the water pipeline and trough proposed for livestock in the Scorpion WSA. PNV is not directly related to livestock forage condition. For example, an area with the PNV type of pinyon-juniper woodland would not produce a maximum amount of livestock forage. The ecological rule here is that immature ecosystems are more productive than mature or climax ecosystems, even though climax ecosystems have greater biomass. Management at one earlier successional stage where pinyon-juniper is the PNV type would benefit both livestock and big game.

**33.45 COMMENT:** The statement that scenic qualities in the Dry Fork of Coyote Gulch are less than outstanding because it does not contain a "green ribbon in red rock" is another example of BLM's application of extremely narrow and biased definitions of wilderness qualities in order to eliminate areas. [Tim Graham]

**33.45 RESPONSE:** See the response to Specific Comment 33.18.

**33.46 COMMENT:** The Cedar City District has lied about the Visual Resource. Only King Mesa has received

a Class A scenic quality classification, even though "the tributaries to Twenty-Five Mile Wash drainage area exhibits the largest expanse of exposed Navajo Sandstone slickrock in the middle Escalante River drainage. This basin of slickrock is a photographic subject and sightseeing objective of superior quality." These areas should also have a Class A scenic quality rating. In addition, I object to BLM's classification of 24,984 acres of the WSA as VRM Class IV. [Owen Severance]

**33.46 RESPONSE:** See the responses to General Comment 19.1 and Specific Comments 27.24, 31.52, and 31.53.

**33.47 COMMENT:** Is Class A scenery included in the partial? [State of Utah]

**33.47 RESPONSE:** The Class A scenery is included in the enlarged partial in the Final EIS.

**33.48 COMMENT:** The culture resource analysis is lacking. [Utah Wilderness Coalition, Charles Bagley, and Doug Green]

a. As BLM admits, many special features are found including the geologically outstanding and highly scenic Twenty-Five Mile Wash and Dry Fork of Coyote Gulch. Other features include "20 archaeological sites with scientific and educational values." When BLM completes the required inventories identifying special features, more will be found. We place high importance in this area and our many outings in this area validate the wilderness values found in this WSA.

b. "Approximately 20 archaeological sites, including occupation sites, campsites, and pictographs, have been identified in the WSA. It is not known if any of the sites are of National Register quality." Shouldn't we find out?

c. I would like to point out that I did see several fascinating archeological sites including apparently unapproachable cliff dwellings in this Wilderness Study Area. This could be discussed more under Cultural Resources.

**33.48 RESPONSE:** There are no "required inventories" to be done for the EIS or the Wilderness Study Reports. The archeological sites are noted in the section on Cultural Resources and additional information

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

has been included. See the response to General Comment 20.2.

**33.49 COMMENT:** The NPS ranger in Escalante told me that Coyote Gulch has been over-used (and is expected to be more so in the future); and thus, opening a developed trailhead into Coyote Gulch will exacerbate this problem. [Martin Barth]

**33.49 RESPONSE:** New trailheads would consist of a gravel parking area, register box, and perhaps a toilet. These facilities would not create additional use. Rather they would reduce impacts from scattered, random parking and problems of waste disposal. Additional trailheads would tend to spread the visitor use, and thus to some extent reduce the problem of over use. If heavy use were to become extreme in areas of concentration, it may necessitate a reservation and permit system in the future, regardless of the number or location of trailheads. The trailheads for Coyote Gulch generally are Red Well and Hurricane Wash; not Dry Fork of Coyote Gulch. Red Well and Hurricane Wash are not within the WSA.

**33.50 COMMENT:** I see the primary use for the two areas in this WSA as thresholds to the Escalante River. Both Twenty-Five Mile Wash and Scorpion Gulch are good access routes into the Escalante River, and with areas like Harris Wash and Hurricane Wash getting increasing pressure, hikers in search of solitude are likely to turn to other routes. It would be a shame to allow this pristine area to be scared by ORV tracks or disturbed by mining or drilling exploration, especially in view of the closeness of these areas to the Escalante River. Both areas are easily accessible from the Hole-In-The-Rock road, and any NPS trailhead facilities could be located there. [Robert Hassell]

**33.50 RESPONSE:** The potential mineral development is low in the Scorpion WSA. Future ORV use in the area would likely be on Scorpion Flat. The BLM land use plans could close the canyons to ORV use if it were to become a problem. The Hole-in-the-Rock road is and would continue to be the main vehicle route to trailhead locations. The Twenty-Five Mile and Scorpion trailheads are located on BLM-administered land and are not under consideration by BLM for transfer to the National Park Service.

**33.51 COMMENT:** The hiking routes across Scorpion to Scorpion Gulch and Fool's Canyon are mentioned in the recreation section but are conspicuously

absent from the wilderness. We believe these routes also provide quality backpacking and horseback riding experiences and contribute to the overall outstanding opportunities for primitive recreation in the WSA. [Rex and Judy Wells]

**33.51 RESPONSE:** The Wilderness Values section of the EIS mentions outstanding opportunities for backpacking and horseback riding, under the subheading of Primitive and Unconfined Recreation.

**33.52 COMMENT:** Under the heading of Recreation, one may note that wilderness designation of the entire area would result in very little reduction in ORV use, as there is already essentially none there now, anyway. This section should be labeled as "no impact and nonrelevant." [Charles Bagley]

**33.52 RESPONSE:** The information that little or no ORV use now occurs is considered to be relevant. Projections show that ORV use will likely increase in the future.

**33.53 COMMENT:** The discussion of ORV use would allow "occasional and short term vehicular access approved by BLM for maintenance of approved range land developments." This wording implies that ORV use would be allowed for any maintenance. Although the BLM Wilderness Management Policy does allow this type of use, it also states that this should be allowed "where practical alternatives do not exist" and that motorized equipment need not be allowed "where such activities can reasonably and practically be accomplished on horseback or foot." [Rex and Judy Wells]

**33.53 RESPONSE:** See the response to Specific Comment 29.38.

**33.54 COMMENT:** Broken sand and slickrock offer their own kind of desert experience. That type of landform is not well represented in the NPS or in the preliminary recommendation for Utah's BLM lands. In the Scorpion WSA, that type of landform is interspersed with canyons of recognized value. In any case, the guidelines found on page 30 (Volume I) of the Draft EIS would indicate the entire WSA should be recommended as wilderness. [Utah Wilderness Association]

**33.54 RESPONSE:** The criteria and rationale for the Proposed Action in Volume I, Chapter 2, have been revised and clarified. Rationale for this specific

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 33: SCORPION WSA (CONTINUED)

WSA is summarized in Appendix 11 in Volume I. Substantial acreage of the sandstone-slickrock landform type is proposed for wilderness designation in Utah, including 14,978 acres in the Scorpion WSA.

**33.55 COMMENT:** One of the major shortcomings of the entire BLM review process is in the application of solitude criteria. It does not take 200-foot cliffs and canyon walls to screen one 6-foot person from another. An area that is remote and large, even if relatively flat, offers incredible opportunities for solitude because there are few people there. A type of terrain that you seem to continually reject on this basis is slickrock domes and rolling fossil dunes such as are found in Fiddler Butte, Scorpion, Escalante Canyon, and other WSAs. This country is very unique and extremely beautiful and wild and should be preserved. The lack of vegetation and deep canyons do not preclude solitude. How many people did your field workers see during their inventory on these slickrock areas? [Tim Graham]

**33.55 RESPONSE:** See the responses to General Comment 22.3 and Specific Comment 26.51.

**33.56 COMMENT:** The entire Scorpion, Steep Creek, and Phipps-Death Hollow areas WSA's should be included. I have hiked these areas in all four seasons, and the entire areas are natural and have outstanding opportunities for solitude and primitive recreation, and niggling back the boundaries to the "most-most-most-outstanding" area violates wilderness study policy. [Jay Lepreau]

**33.56 RESPONSE:** See the response to Specific Comment 29.43.

**33.57 COMMENT:** BLM's analysis of opportunities for solitude is wrong. [Doug Green, Owen Severance, and Michael Salamacha]

a. In this WSA, the Cedar City District seems to be trying for another record--most lies about a WSA. I have hiked extensively in this area and can state unequivocally that all of the WSA except the southwest corner (the area between the Hole-in-the-Rock Trail and the South Rim of the Dry Fork of Coyote Gulch) meets all of the requirements for wilderness designation. The statement that only 27 percent of the WSA offers outstanding opportunities for solitude is totally unfounded. "Because the terrain is not exceptionally difficult or rough, it exhibits only mediocre topographic screening situations that would pro-

vide little opportunity for solitude and are not considered outstanding." This use of topographic screening as the sole definition for solitude is outrageous. The two roads that provide access to this WSA, the Egypt road and the Early Weed Bench road, are used by only a few cars each week. The outstanding opportunities for solitude begin within 100 feet of these roads because of the isolation provided by the rugged topography of the WSA and the lack of traffic on the access roads. These roads follow the high ground, so they are unnoticeable as soon as the visitor leaves the road. The statement "the Scorpion area is a relatively flat, undifferentiated, and sparsely vegetated flat . . ." is a lie. Anyone who has hiked this area will tell you that it is not a flat undifferentiated area. It consists of rolling sandstone "dunes" cut by innumerable small gullies. BLM's bias against "badlands" areas as wilderness also shows up in this WSA by claiming that the very colorful Allen Dump and Early Weed Bench badlands do not meet either wilderness requirement--another lie. Any objective observer would disagree with BLM's position. The hiking, backpacking, and photography opportunities are outstanding throughout this WSA because of the canyons and also because of the difficulty of navigating across the broken Scorpion landscape. Few people see this intricately carved landscape with its extremely colorful and scenic landforms. Therefore, I also disagree that only 32 percent of the WSA has outstanding opportunities for primitive recreation.

b. The Draft EIS states that, "The opportunity for solitude is dependent on topographic screening influences rather than vegetation screening or combinations of vegetation and topographic screening . . . . Approximately 73 percent of the WSA (26,184 acres) lacks the outstanding opportunity for solitude . . . . Because the terrain is not exceptionally difficult or rough, it exhibits only mediocre topographic screening situations that would provide little opportunity for solitude and are not considered outstanding." I disagree with this finding because I disagree with the premise it is founded upon. The idea that "solitude" means the visitor must be "out of sight" is, in this instance, incorrect. In its definition of wilderness, the Wilderness Act states that "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man . . . retaining its primeval character and influence, without permanent improvements or human habitation . . . with the imprint of man's work substantially unnoticeable." Walk

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 33: SCORPION WSA (CONTINUED)

out to that high point on Early Week Bench in the heart of the Scorpion WSA and look around. From this and other high points in Scorpion, you are able to gaze out across literally thousands of square miles of landscape, and nowhere will you see any imprints of human activity. This is the very essence of solitude--to be able to gaze across a vast expanse of landscape, larger than the city of Los Angeles, and still see only what nature has wrought.

c. BLM refuses to acknowledge the fact that screening either topographic or vegetative, is not necessary for solitude. In Appendix 1 in Volume I, Part B, p. 217, "Solitudes defined as . . . the state of being alone or remote from habitation: isolation; also, a lonely, unfrequented, or secluded place." Nowhere is screening of any kind mentioned.

**33.57 RESPONSE:** See the responses to General Comment 22.3 and Specific Comments 26.47 and 26.51.

**33.58 COMMENT:** We find it ridiculous to declare that there is little opportunity for solitude in most of this WSA. One of us looked for over 2 hours for two people that were within a mile or so, and were known to be in the area; if it is that difficult to see other people when searching for them, we think that opportunities for solitude are quite good. The area in which this incident happened was just north of the trailhead at the end of the Early Weed Bench road, in what BLM terms open, exposed slickrock. This type of terrain is abundant throughout the WSA, and certainly provides opportunities for solitude. [Tim Graham]

**33.58 RESPONSE:** The likelihood for someone to be lost is not part of the criteria for outstanding solitude. BLM considers the opportunity for solitude to be outstanding in this slickrock area.

**33.59 COMMENT:** The discussions of opportunities for solitude in the Scorpion area are contradictory. In one paragraph, it is stated, "The other factor identified as contributing to the opportunity for solitude is the broken topography of the Scorpion area." Yet the next paragraph states, "Because the terrain is not exceptionally difficult or rough, it exhibits only mediocre topographic screening situations that would provide little opportunity for solitude." The Utah Proposed WSAs (April 1980) as referenced in the Utah Final Decision of WSAs (November 1980) states the Scorpion area does possess solitude because of its size and topography. Thus, the second statement men-

tioned above is in violation of BLM's inventory information. It should be noted that size of the Scorpion area or of the WSA are not mentioned as factors contributing to solitude in the Draft EIS, but are factors mentioned in the Wilderness Study Policy that are to be evaluated. We believe the entire WSA exhibits outstanding opportunities for solitude. [Rex and Judy Wells]

**33.59 RESPONSE:** The text has been clarified to eliminate the apparent contradictions. Also, see the responses to General Comment 22.3 and Specific Comment 26.51.

**33.60 COMMENT:** The Scorpion WSA is located about 25 miles southeast of the town of Escalante and includes Twenty-Five Mile Wash and the Dry Fork of Coyote Gulch, which are tributaries of the Escalante River. Twenty-Five Mile Wash provides access to the Escalante River with a canyon that starts as a shallow wash and continuously deepens as it winds its way slowly downward. The Dry Fork of Coyote Gulch exhibits concentrations of deep slots that are not equaled anywhere in the Escalante River drainage. BLM has attempted to eliminate most of the WSA by misinterpreting the definition of solitude and downgrading the primitive and unconfined recreational opportunities. According to the definition, solitude is not to be determined by the amount of vegetative or topographic screening. Using the definition as given in Volume I, the entire unit meets the wilderness standards for solitude. The Draft EIS finds the unit to possess extraordinary qualities. The sightseeing and photographic activities are outstanding quality. Also the opportunities for backpacking, drawing, painting, and geologic sightseeing are also outstanding. [Kim Jennyson]

**33.60 RESPONSE:** The referenced definition of solitude in Volume I says: "Solitude means the state of being alone or remote from habitation; isolation; also, a lonely, unfrequented, or secluded place." The BLM wilderness inventory policy stipulates the various landscape attributes that include vegetative and topographic screening. The definition does not exclude these factors.

**33.61 COMMENT:** When one uses BLM's limited definition of solitude as being dependent upon topographic and vegetation screening, the Scorpion WSA should still qualify as being an outstanding designation for a hiker seeking solitude. Having backpacked in the WSA many times, I know that there is abundant

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

topographic and vegetation screening to give one a sense of solitude. Confirmation of this can be seen by examining the USGS topographic maps of Moody Creek, King Mesa, Sunset Flat, and Big Hollow Wash. There is from 80 to over 500 feet of elevation change throughout the very areas BLM claims is lacking topographic screening. Scorpion is an important part of a larger whole, the entire Escalante drainage. There are no natural features that divide the landscape into wilderness/nonwilderness areas. The biosphere that is the Escalante needs to remain whole, not arbitrarily divided into parcels. I urge BLM to preserve and protect the integrity of the whole Escalante Basin and advocate the All Wilderness Alternative for the Scorpion WSA in its final recommendation. [Wayne King]

**33.61 RESPONSE:** See the responses to General Comment 22.3 and Specific Comments 31.1 and 33.5.

**33.62 COMMENT:** The Draft EIS states that 35,876 acres of a possible 35,884 or 99.98 percent of the WSA is in its natural state. Using BLM's figures for visitor use from Volume III-B of 175 visitor days per year in the WSA, it can be determined that on average there is less than 50 percent chance that on any particular day of the year, the WSA will have even 1 visitor in its entire 35,876 acres. It is ludicrous for BLM to claim that in an area as large as the Scorpion WSA with a use level of less than one visitor every two days, that the opportunity for solitude is anything less than outstanding. Again, it should be obvious that if a hiker is alone in an area of almost 36,000 acres preserved in its natural state, that is itself bordered by an even larger wilderness, then that hiker has to be having an outstanding wilderness experience with complete solitude. To claim otherwise as BLM has done is simply false and seemingly could only be arrived at by deliberately misinterpreting the data. [Wayne King]

**33.62 RESPONSE:** See the responses to General Comments 22.3 and 22.5.

**33.63 COMMENT:** The Scorpion area, itself a desert-like highland between Coyote Gulch and 25-Mile Wash, is an unusual and interesting geographic feature where excellent opportunities are ample to allow visitors to be out of site of each other within minutes, as is evident from the ease in which a person can get lost there. Because this headland is surrounded on the north by outstanding wilderness areas of 25 Mile Wash and on the south by the Dry Fork of

Coyote Gulch, which is of obvious wilderness potential, the entire intervening Scorpion highlands also should be designated as wilderness. [Charles Bagley]

**33.63 RESPONSE:** BLM field personnel have determined that Scorpion Flat does not have outstanding opportunities for solitude and primitive recreation. The Brimstone Gulch-Cat Pasture portion of the "highlands" does exhibit outstanding opportunities.

**33.64 COMMENT:** Under the section entitled Wilderness Values, the Proposed Action receives excessive discussion. The bulk of the discussion in this paragraph emphasizes that various percentages of the wilderness qualities of the entire area will still be preserved under the Proposed Action alternative, even though it only protects 1/4 of the Wilderness Study Area. This statement fails to be balanced by a statement under the "All Wilderness Alternative" of 35,000 under which 100 percent of all wilderness characteristics will be maintained. The relative size and descriptiveness of these paragraphs need to be altered. [Charles Bagley]

**33.64 RESPONSE:** The substance and significance of the analysis is not determined by the number of words used to describe the situation. Of necessity, the analysis of a Partial Wilderness Alternative requires greater explanation than the All Wilderness Alternative since the partials have both wilderness and nonwilderness conditions to analyze. This does not mean that the shorter text for All Wilderness is any more or less important.

**33.65 COMMENT:** The EIS says, "The Dry Fork of Coyote Gulch Canyon is an unusual landscape feature because it is one of the few major western drainages to the Escalante River lacking riparian vegetation." The text completely fails to note Peek-A-Boo Canyon, the unofficial name for an officially unnamed Dry Fork tributary adjacent to Brimstone and Spooky Gulches. This particular canyon is absolutely unique because it contains several natural bridges. Nowhere else is there a stretch of "narrows" like this, with natural bridges such as these. If for no other reason, this portion of the Scorpion WSA deserves official recognition because it does, as the Wilderness Act states, "contain ecological, geological, or other features of scientific, educational, scenic, or historical value." [Doug Green]

**33.65 RESPONSE:** The unnamed tributary referred to in the comment as Peek-A-Boo Canyon is included



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 33: SCORPION WSA (CONTINUED)**

in the expanded Partial Wilderness Alternative in the Final EIS. Brimstone and Spooky Gulches are also included.

**33.66 COMMENT:** Stating that the 8 acres of imprints is less than 1 percent of the WSA is an overstatement. By our calculation, 8 acres represents 0.02 percent of the WSA. [Rex and Judy Wells]

**33.66 RESPONSE:** BLM considers that rounding to the nearest 1 percent is sufficient to describe the situation. The acreage figure has been revised for the Final EIS.

**33.67 COMMENT:** According to the Draft EIS, negative economic impact of wilderness designation would be minimal, and potential for development of the minerals in the WSA is very low. Yet, the area eliminated from wilderness consideration happens to be the area with most of the mineral potential. This is a very convenient coincidence and not the only WSA where this coincidence occurs. BLM appears to use the rather imprecise criteria of wilderness values, as defined by them in a questionable manner, to eliminate an area which also has potential, no matter how small, of mineral development. There are many areas where the wilderness values obviously outweigh the mineral potential, yet BLM does not recommend them for wilderness status. In Scorpion, the only resource conflict is potential for uranium development on the eastern boundary of the WSA. This border abuts Glen Canyon NRA proposed wilderness. How would development affect the Glen Canyon portion of this area? The uranium deposits did not seem to affect the designation of wilderness in Glen Canyon. This issue was addressed during scoping, but was not treated in the Draft EIS at all. It should be addressed. [Tim Graham]

**33.67 RESPONSE:** See the responses to Specific Comments 33.5 and 33.21.

**33.68 COMMENT:** We cannot see how this alternative would conflict with the county's plans "because oil and gas leases would expire and future leasing and location of minerals would not be allowed." The Draft EIS admits the likelihood of mineral development in the WSA is minimal to nonexistent, thus no conflict exists. [Rex and Judy Wells]

**33.68 RESPONSE:** County land use plans provide for traditional multiple uses, including minerals. The fact that BLM has identified the potential for oil and

gas to be low does not alter the county plan. The county plan would be in favor of mineral exploration regardless of low estimates of mineral potential.

**33.69 COMMENT:** It is stated the No Action Alternative is based upon implementation of the current BLM Escalante MFP and is therefore in conformance with it. This implies the All Wilderness and Partial Wilderness Alternatives would not be consistent with the MFP. This is misleading because wilderness was purposely not included in the MFP due to the upcoming wilderness review process. Furthermore, since no significant resource conflicts have been identified and management would be essentially the same as described in the MFP, we believe all alternatives would be in conformance with the MFP. [Rex and Judy Wells]

**33.69 RESPONSE:** See the response to Specific Comment 29.49.

**33.70 COMMENT:** The Scorpion WSA is a special concern. The WSA is divided into two discrete units. The proposed alternative would delete the southeast unit. That one includes the upper reaches of Coyote Gulch, the most heavily used backpacking area in the Glen Canyon National Recreational Area. The area receives over 25,000 visitors each year and visitation is continuing to increase. Coyote Gulch is designated a Natural Zone and recommended wilderness in the Glen Canyon General Management Plan. [National Park Service]

**33.70 RESPONSE:** The recreation use in Coyote Gulch and the relationship of the WSA and the Glen Canyon NRA are described in the EIS.

**33.71 COMMENT:** BLM should consider the NPS proposed wilderness as a complement to Scorpion, and in particular to this discussion, Scorpion should be seen by the NPS as a complement to its own proposed wilderness within Glen Canyon NRA. The two quite naturally go hand in hand. [Doug Green]

**33.71 RESPONSE:** The EIS identifies where BLM wilderness management would complement similar management on adjacent lands administered by other Federal agencies.

**33.72 COMMENT:** Under the section Land Use Plans and Controls, the comments are made that both alternatives are inconsistent with county concepts of multiple use. As shown in the text, however, Kane County has a blanket opposition to all further wilderness

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 33: SCORPION WSA (CONTINUED)

under all circumstances; and therefore their opposition to this wilderness designation is not of any special importance. [Charles Bagley]

**33.72 RESPONSE:** See the responses to General Comment 23.8 and Specific Comment 25.23.

**33.73 COMMENT:** The NPS proposal to acquire an access corridor through the WSA would or would not affect wilderness values. [Utah Wilderness Association, Doug Green, Charles Bagley, and Rex and Judy Wells]

a. I am greatly disturbed by the NPS proposal to acquire parts of Twenty-Five Mile Wash and/or Dry Fork of Coyote Gulch as an "access corridor" to the Glen Canyon NRA. The Draft EIS states "The National Park Service (NPS) has indicated it would be in the best interest of the Department of the Interior to designate these canyons as nonwilderness corridors. The proposal does not envision these additions as wilderness but rather as recreation and resource utilization zones where necessary development might take place. I am frankly surprised at the Park Service for considering such an action, and for several reasons I think it would be a serious error to open up either of these canyons to "necessary development," which is indeed quite unnecessary.

b. The Draft EIS mentions some NPS proposals to use the excluded part of Scorpion for a nonwilderness corridor. The Draft EIS did not state where this development would occur nor did it discuss the feasibility of such proposals. More importantly, it did not even evaluate the impact that any such "proposals" would have on wilderness values within the unit if they ever matured into real plans and projects.

c. The EIS states this alternative would conflict with the NPS proposals for acquiring part of the area (25 Mile Wash and Coyote Gulch) for use as an access corridor. In the Affected Environment, it is also stated the NPS proposes these areas for necessary development. We do not think the All Wilderness Alternative would cause significant conflicts with the NPS proposals. Access is currently available down these canyons and would still be available if designated as wilderness. We doubt the general public cares whether or not the NPS or BLM administers the area, so this alternative does not really conflict with the NPS acquisition proposal and management of the areas could be coordinated between the NPS and BLM. We also do not think this alternative conflicts with any

development proposals since the only areas suitable for development are where the existing roads cross these drainages.

d. The EIS notes plans of the NPS to establish trail-heads at the Dry Fork Coyote Gulch site and at 25 Mile Wash. These NPS plans need not be in conflict with wilderness designation since all development necessary for a ranger station and controlled access at these sites could be accomplished within the usual and customary road setback of 30 to 100 feet between the "Hole-in-the-Rock road" and the wilderness area. Thus, the NPS plans do not constitute an argument against wilderness designation.

**33.73 RESPONSE:** BLM has no plans to exchange or transfer lands on the Scorpion WSA. The "necessary development" most likely would be trailhead facilities which would serve the purposes of both agencies to accommodate hiking use in the region. See the responses to Specific Comments 33.49 and 33.50.

**33.74 COMMENT:** There is very inadequate discussion of the fact that the Glen Canyon NRA apparently had anticipated that the entire WSA would become wilderness, and not only the northern 1/4. There is inadequate discussion of the potential consequences of failing to designate the southern 3/4 of the WSA as wilderness, in opposition to the Glen Canyon Management Plans. The impacts of this deviation from the Glen Canyon plans should be discussed and considered further. [Charles Bagley]

**33.74 RESPONSE:** Glen Canyon Management Plans do not apply to BLM managed lands; however, consistency with adjacent uses is considered in the BLM land use planning process. No significant impacts to the Glen Canyon NRA are expected with any of the alternatives for wilderness designation or nondesignation of the Scorpion WSA.

**33.75 COMMENT:** There are significant discrepancies between the alternatives relating to the revenues from mineral leasing. The socioeconomics section states, "Half of these monies would be allocated to the State, a portion of which could reach the local economy." Also, it is stated that, "mineral leasing revenue that is directed back to local governments would be lost." Yet, later it is stated, "This revenue would not be transferred to State programs; however, none of this money normally flows back to the local economy." The discussion later also states that this money normally does not flow back to the local

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 33: SCORPION WSA (CONTINUED)

economy and adds, "there would be little impact to local communities." We do agree that the loss of this income would be insignificant to the local economy. [Rex and Judy Wells]

**33.75 RESPONSE:** All of the socioeconomic information has been updated, revised, and clarified. Contributions to the local economy from activities in the Scorpion WSA would be insignificant.

**33.76 COMMENT:** How can the Red Canyon hot spring be 40 miles northeast of Scorpion and also be 40 miles northeast of Fifty Mile Mountain when the WSAs are at least 5 miles apart. [Brian Wood]

**33.76 RESPONSE:** The reference to the distance from Red Canyon is correct for the Scorpion WSA. The distance has been revised in the Fifty Mile Mountain analysis.

**33.77 COMMENT:** The map should show the adjacent Glen Canyon NRA wilderness proposal. [Rex and Judy Wells]

**33.77 RESPONSE:** The existing or proposed wilderness of other Federal agencies is shown on Pocket Map 2, Volume I.

**33.78 COMMENT:** In discussing the potential for uranium development, the Draft EIS is internally inconsistent and seems to be deliberately misleading. Table 3, Mineral and Energy Resource Rating Summary, is a case in point. In looking at Table 3, one is given the impression that the Scorpion WSA has a high favorability (f4) and certainty (c4) for the recovery of 6,400 tons of uranium oxide and is marginally favorable (f2) and moderately certain (c3) for producing approximately 500 additional tons of uranium oxide. The extent to which BLM is deceiving the public can be seen by reading the text and doing a few simple calculations. The Draft EIS states (Volume III-B, P. 14) "According to the U.S. DOE (1983) about 6,080 acres (17 percent of the WSA) in the eastern portion of the WSA lie within a 1,126-square-mile area considered to have a high certainty (C4) for the occurrence of large deposits of uranium (f4). This area is identified by the U.S. DOE as the Greater Circle Cliffs probable resource area. (I choose to abbreviate the above as GCC). The 6,080 acres of probable resource within the WSA account for less than 1 percent of the probable resource area." In fact only 0.84 percent. The Draft EIS continues, "the Greater Circle Cliffs probable resource area has a 50-percent probability to

contain about 6,400 tons of uranium oxide." This figure is for the entire GCC and not for the Scorpion WSA as Table 3 misleadingly infers. [Wayne King]

**33.78 RESPONSE:** The uranium discussion has been revised and updated for the Final EIS. See the response to General Comment 15.1. The Final EIS reports that there is low probability of significant uranium deposits in the WSA.

**33.79 COMMENT:** I disagree with BLM's assumption that experiencing solitude is dependent upon topographic or vegetation screening. By this absurd definition, a single human in a boat in the middle of the Pacific Ocean, hundreds or thousands of miles from the nearest human, would have no opportunity for solitude because of the lack of topographic or vegetation screening. Clearly a definition of solitude that completely ignores a hiker's probability of encountering other humans is extremely lacking. [Wayne King]

**33.79 RESPONSE:** See the responses to General Comments 2.12 and 2.13.

**33.80 COMMENT:** We question rating silver favorability as "f2" in the Mineral and Resource Rating Summary (Table 3, Draft EIS p. 12, Volume III-B); our studies (BOM report in progress) indicate no known silver-bearing units exist within the study area. A rating of "f1" would appear more appropriate. [Bureau of Mines]

**33.80 RESPONSE:** BLM concurs; silver has been deleted from Table 3 in the Final EIS because of little or no potential.

## SECTION 34

### ESCALANTE CANYONS TRACT 5 ISA

**34.1 COMMENT:** BLM has ignored most of the impressive canyon rim area that surrounds the canyon bottoms. To protect the naturalness of the area, the Utah Wilderness Coalition's 4,400-acre proposal should be considered. [Sierra Club, Cache Group]

**34.1 RESPONSE:** The 4,400-acre proposal extends beyond the ISA boundaries and therefore does not qualify. See the response to General Comment 3.1.

**SPECIFIC COMMENTS AND REPOSSES**  
**SECTION 34: ESCALANTE CANYONS TRACT 5 ISA (CONTINUED)**

**34.2 COMMENT:** Initially this area contained more than 5,000 acres meeting the naturalness criteria in the wilderness inventory. No exact initial unit acreage has been published and circulated to the public. A larger area meeting the wilderness criteria should have been studied. The practice of making deletions in the initial inventory which violate the inventory policy which later help BLM justify dropping the whole area occur frequently. [Utah Wilderness Coalition]

**34.2 RESPONSE:** See the response to General Comment 3.1.

**34.3 COMMENT:** BLM provided no public opportunity for comment on the wilderness intensive inventory for UT-040-83 and Escalante Tract 5. BLM deleted large amounts of natural wilderness land without any public explanation. Hurricane Wash, one of the most popular hiking routes in the Escalante drainage, should be included. It is the main access hiking trail down Coyote Gulch. We have included two major side canyons to Hurricane Wash on the south, the rugged bench area between the Forty Mile Ridge and Coyote Gulch, and Chimney Rock, a scenic monolith. These areas meet the naturalness criteria and should be added to the wilderness study area. We request BLM produce any documents which show the inventory analysis and decisions concerning this area and attach them to this Draft EIS. [Utah Wilderness Coalition]

**34.3 RESPONSE:** The public comment period for the Instant Study Area portion of the inventory process was announced by Federal Register notice in January 1980. The inventory phase has been concluded.

**34.4 COMMENT:** Although we understand the technical rationale for splitting the Escalante Area into 5 separate ISAs and WSAs, the analysis should consider these areas as a complex of tracts that would preserve substantially all of the Escalante drainage stretching from the proposed Forest Service WSA on the Aquarius Plateau to the Glen Canyon NRA and the confluences with the Colorado River. [Neal Berg]

**34.4 RESPONSE:** See the response to Specific Comment 29.1.

**34.5 COMMENT:** In an earlier part of the wilderness study, BLM recommended nonwilderness for this area. This ISA, containing a designated outstanding natural area, meets the wilderness suitability criteria. Dropping an area solely on the basis of a BLM wil-

derness value rating system directly violates the wilderness study policy.

BLM previously stated that a recommendation (of nonwilderness) is consistent with Kane County's wilderness policy. BLM incorrectly uses the policy as an approved land use plan. This policy, correctly considered under public input, can be considered if it raises significant information guiding wilderness study recommendations. As presented, this policy is an unsupported opinion. BLM has indicated that the unit is not a viable independent candidate for inclusion in the NWPS. This argument offers no support for BLM's non-wilderness recommendation. [Utah Wilderness Coalition]

**34.5 RESPONSE:** The comment has no bearing on the Draft or Final EIS because both documents include the All Wilderness Alternative for this ISA as part of the BLM's Proposed Action alternative.

**34.6 COMMENT:** BLM reversed its recommendation comments on this area. This area contains a portion of Coyote Gulch, one of the most outstanding canyons in this region. The Draft EIS concludes that there are no problems with leases or mining claims. No conflicts are found by BLM with uranium and other minerals. BLM's previous recommendation of no wilderness clearly demonstrates a distortion of the study policy to arrive at a pre-conclusion. Years ago, BLM decided which areas would be recommended as wilderness. This decision was recorded verbally. [Utah Wilderness Coalition]

**34.6 RESPONSE:** The comment is incorrect. BLM wilderness recommendations will not be determined until after public review of the Draft EIS, consideration of public input, and completion of mineral reports by the USGS and USBM. The recommendation will be made in Wilderness Study Reports due for completion in 1991. The Utah State Director determined BLM's Proposed Action for the Final EIS, (which will be used in developing final recommendations) during the preparation of the Final EIS in late 1987 and early 1988.

**34.7 COMMENT:** The Colorado Plateau has the finest desert scenery, and in greater abundance than any other place in the entire nation--and probably the world. People travel from all over the world to visit these incredibly scenic and remote lands. The plateau contains seven national parks and numerous national monuments. In this land of superlatives, the Escalante

**SPECIFIC COMMENTS AND REPOSSES**  
**SECTION 34: ESCALANTE CANYONS TRACT 5 ISA (CONTINUED)**

River canyons are the most spectacular, the most beautiful, the most fun, the most popular, and the most famous. The Escalante is the best of the best! These canyons are internationally acclaimed for their beauty, solitude, and unsurpassed recreation opportunities. These canyons are proven recreational assets, proven tourist attractions, and proven (and undisputed) wilderness. Yet your agency is willing to sacrifice large chunks of Utah's prime wilderness jewel for an ephemeral short-term economic gain. I am shocked and appalled! [Scott DeLong]

**34.7 RESPONSE:** The scenic attributes of the Escalante Canyons Tract 5 ISA and related areas are recognized in the EIS. See Appendix 11 for a summary of rationale for the BLM Proposed Action alternative.

**34.8 COMMENT:** BLM ignores the impacts possible under nonwilderness management. The record of BLM to compromise in favor of wilderness destruction clearly demonstrates that multiple use under the present agency cannot protect this area's resources. The multiple use benefits of protecting many threatened species, scenic values, and recreation uses are at their highest in the all wilderness recommendation. [Utah Wilderness Coalition]

**34.8 RESPONSE:** There are no known or proposed threats to wilderness values in the Escalante Canyons, Tract 5 ISA. This is substantiated by the fact that wilderness proponents recognize that there are no conflicts between wilderness designation and other resource uses. See the responses to Specific Comments 34.6 and 34.12.

**34.9 COMMENT:** In the geology section, more detail on the Jurassic Formations would be helpful. [State of Utah]

**34.9 RESPONSE:** Since intensive geologic description is not significant to the study process for this ISA, little would be gained by adding more detail in describing the Jurassic Formations.

**34.10 COMMENT:** The Draft EIS states that "available mineral investigation reports by the USGS and USBM, will be reviewed by BLM prior to making final wilderness recommendations" and that, "the SAI (1982) report will be used as the reference on oil and gas potential for this EIS." Since the USGS/USBM report has been completed for this area, is referenced in the bibliography (Weir and Lane, 1981), and is the official report required by FLPMA, it should be used

for all mineral potential information. [Rex and Judy Wells]

**34.10 RESPONSE:** The USGS/BOM report has been used for this ISA. See the response to Specific Comment 29.27.

**34.11 COMMENT:** The discussion of mining claims in this alternative does not include the required validity examinations (Wilderness Management Policy, page 26). [Rex and Judy Wells]

**34.11 RESPONSE:** Validity examinations are not required in the study process or for the EIS. The Wilderness Management Policy applies only after an area is designated as wilderness.

**34.12 COMMENT:** We do not believe that presentation of a worst-case analysis is appropriate for mineral development in the No Action Alternative. Based upon the low potentials for oil and gas and uranium, we believe the most likely situation would be no development of these resources and that the worst-case analysis is misleading and gives the impression of a conflict that does not really exist. Our statement is supported by the description of potentials in the Affected Environment section and statements under the All Wilderness Alternative impact section that there is a low likelihood of exploration and development activities for oil and gas and that it is unlikely that exploration and development for uranium will occur. Therefore, we think the worst-case situation, including the impacts to all other resources, should be deleted and the analysis should be based on the expected lack of future development. [Rex and Judy Wells]

**34.12 RESPONSE:** The mineral assumptions and analysis have been revised in the Final EIS and no mineral development is projected.

**34.13 COMMENT:** This ISA is considered to have high wilderness values and low conflicts compared to other WSAs in this part of the region. The wilderness values are found in the small section of the Dry Fork of Coyote Gulch which was previously designated an Outstanding Natural Area. [State of Utah]

**34.13 RESPONSE:** The high wilderness values are dependent on the association of the ISA with similar areas in the adjacent Glen Canyon NRA.

**SPECIFIC COMMENTS AND REPOSSES**  
**SECTION 34: ESCALANTE CANYONS TRACT 5 ISA (CONTINUED)**

**34.14 COMMENT:** This tiny area would merit no attention at all if it weren't for the fact that Coyote Gulch crosses the northwest corner of the tract near its junction with Harris Wash. The area abuts the Glen Canyon NRA on two sides. Coyote Gulch is one of the premier canyons of the lower Escalante River system and is simply too important to ignore, even in a small stretch as represented by this ISA. It is true that most hikers enter Coyote Gulch via Hurricane Wash, but many also enter it further up and hike through this section. I once entered this section of the canyon by hiking north and east from Chimney Rock. The section downstream from the Dry Fork is a spectacularly beautiful part of the canyon, and all the more important to the Escalante wilderness because it is not as heavily visited as the section downstream from Hurricane Wash. In my comments during the scoping process I mentioned that this area would be more appropriately managed as part of the National Recreation Area, a transfer which could be easily accomplished under the terms of the statute which created the Glen Canyon NRA. However, as that is not an option under consideration in this document, I wholeheartedly support the All Wilderness Alternative for this tract. [Robert Hassell]

**34.14 RESPONSE:** The comment is correct in identifying Coyote Gulch as the central feature of the ISA and the adjacent portion of the Glen Canyon NRA. Congress could adjust the Glen Canyon NRA boundary with or without wilderness designation; therefore such action is not part of BLM's wilderness study.

**34.15 COMMENT:** Wilderness designation coincides with Natural Zone and recommended wilderness in the Glen Canyon GMP for these areas: Burning Hills, Escalante Canyon Tract 5, Horseshoe Canyon South, Fiddler Butte, Little Rockies, Grand Gulch, and Dark Canyon. [National Park Service]

**34.15 RESPONSE:** The EIS notes where BLM wilderness alternatives would complement similar management objectives on the adjacent lands administered by the NPS.

**34.16 COMMENT:** BLM's reversal of its previous "no wilderness" stand is a welcome change which I agree with (amazing). This part of Coyote Gulch should be added to Glen Canyon NRA. [Owen Severance]

**34.16 RESPONSE:** See the response to Specific Comment 34.14.

**34.17 COMMENT:** The section on Land Use Plans and Controls cites the Kane County Master Plan's concept of multiple use of lands that rejects wilderness as multiple use. This plan is cited in the impact section as to whether or not designation of this ISA would be consistent with Kane County's plan. We contend that Kane County's plan cannot be used as a factor in the consistency standard. The Wilderness Study Policy states on page 5110 that BLM plans will be consistent with the plans of other agencies and governments "so long as the guidance and resource management plans are also consistent with the purposes, policies, and programs of Federal law and regulation applicable to public land." Thus Kane County's plan is not consistent with Federal policy that recognizes wilderness as a multiple use. [Rex and Judy Wells]

**34.17 RESPONSE:** See the responses to General Comment 23.8 and Specific Comment 25.23.

**34.18 COMMENT:** Which are the other two ISAs referred to on page 10? [State of Utah]

**34.18 RESPONSE:** They are Escalante Canyons Tract 1 ISA and North Escalante Canyons/The Gulch ISA. Escalante Canyons Tract 1 has been reported to Congress as nonsuitable, along with Devils Garden ISA (see the response to Specific Comment 32.24).

**SECTION 35**  
**FIFTY MILE MOUNTAIN WSA**

**35.1 COMMENT:** The original Fifty Mile Mountain inventory unit contained 178,008 acres. BLM used a way along the southern portion of the Straight Cliffs to drop a strip of the unit 2 miles wide and 6 miles long. Uniformly along the Straight Cliffs the rest of the boundary was moved to the top of the Morrison Formation (potential uranium deposits). Excluded at the foot of the cliffs was the Hole-in-the-Rock historic trail. In exaggerating the impacts of a few intrusions, BLM dropped parts of this areas that should have been studied for wilderness. A large area (approximately 12,000 acres) was deleted due to "coal fire suppression activities." The area of this impact is enlarged beyond the significant impacts. In several cases BLM improperly "cherry-stemmed" vehicle ways which are now untravelable. The inventory policy limits cherry-stemming to roads (constructed, maintained, and regularly used vehicle routes). [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

**35.1 RESPONSE:** See the response to General Comment 3.1.

**35.2 COMMENT:** BLM dropped a large area in the Fifty Mile Benches in the eastern part of the area from wilderness study, supposedly because it is heavily intruded from mineral exploration. BLM offers no description of the kind and location of impacts. Later field checks by our volunteers found that BLM was planning exploration activities and they wanted to drop the area to facilitate that exploration. The impacts are almost totally absent. The vehicle way separating Fifty Mile Mountain from the Benches is not a road meeting the requirements of regular use, maintenance, and construction. BLM should join the two units together and consider designation. What few impacts that have occurred are along this boundary way and amount to less than 3 percent of the total Benches area. Those impacts are not significant when compared with the surrounding wilderness area. BLM was incorrect in deleting this area from study. The exploration never occurred to the degree expected as the floor fell from beneath the uranium industry in the early eighties. [Utah Wilderness Coalition]

**35.2 RESPONSE:** The Fifty Mile Bench road has been maintained annually for many years by BLM. It does meet the criteria for a road and it receives regular use by BLM field people, ranchers, recreationists, and others. See the responses to General Comments 3.1 and 4.1.

**35.3 COMMENT:** I can understand your desire to establish a defensible wilderness here by trying to minimize conflicts with the coal resource, and so I can support your Partial Wilderness Alternative with two notable exceptions. First, the boundary along the north face should extend down to the 6,000-ft. contour. This will protect the face of the Straight Cliffs while allowing for vehicular access to the plateau area at the base of these cliffs. Second, put the State sections along the wilderness boundary within the wilderness. This will eliminate the large jogs along the boundary. [Robert Hassell]

**35.3 RESPONSE:** The boundary of the Proposed Action Partial Wilderness Alternative extends generally along the 2,000 meter (about 6,600 ft) contour. This would include the majority of the Straight Cliffs within the designated wilderness area. Regarding the omission of the State sections, see the response to Specific Comment 26.2.

**35.4 COMMENT:** For the All Wilderness Alternative, it is stated that four of 10 State sections adjacent to the WSA likely would be exchanged. However, these specific sections are not identified so it is impossible to know which ones would be exchanged and which ones would not be exchanged. The same problem is in the descriptions of the Partial Wilderness Alternatives. [Rex and Judy Wells]

**35.4 RESPONSE:** See the response to Specific Comment 33.8.

**35.5 COMMENT:** The conflict of wilderness designation with Kaiparowits coal has been overstated [Utah Wilderness Association, Dean Petaja, and Rex and Judy Wells]

a. Perhaps the most remote WSA in Utah, Fifty Mile Mountain, has been trimmed to the bare bones in BLM's preliminary recommendation. The wilderness values are exceptional throughout the unit, as BLM makes clear in the Draft EIS. Yet 30 percent of the WSA did not receive a wilderness recommendation. BLM claims that 1 percent of the Kaiparowits coal reserve would be foregone under the All Wilderness Alternative. I think that foregoing 1 percent of this economically questionable resource pales in comparison to the unreplaceable wilderness resource on Fifty Mile Mountain. By omitting much of Rogers Canyon and the straight cliffs, some of the most spectacular and valuable cultural areas have been dropped from wilderness protection. The State lands in Rogers Canyon and all along the western edge of BLM's partial alternative should be exchanged out and be part of the wilderness. Drawing them out for management reasons compromises the integrity of the unit and ironically, seems to make for a less manageable boundary. I urge BLM to reconsider and recommend the All Wilderness Alternative for Fifty Mile Mountain.

b. One of the objectives of the Partial Wilderness Alternative (92,441 acres) is to eliminate conflicts with potential coal development. Although we think it is probably appropriate to analyze a Partial Wilderness Alternative based on potential conflicts with coal since there is an identified coal resource, we can not understand why this alternative was selected as the Proposed Action. Less than 1 percent of the mineable coal in the Kaiparowits coal field is within the WSA. In most analyses, an impact on less than 1 percent of a resource would not be considered significant, yet in this analysis, it is a major reason for recommending 1/3 of the WSA as nonsuitable. Further-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

more, the amount of acreage deleted because of coal is not justified. It is stated that 70 percent of the coal in the WSA is within the 8,400 acres of existing leases, yet the acreage to be deleted is substantially larger. We do not agree that such a large area should be deleted so that about 33 percent of the Kaiparowits coal field reserves would be available for leasing and possible development. The preclusion of any coal development in this WSA would be insignificant to the amount of workable coal in the Kaiparowits coal field and we support the All Wilderness Alternative.

c. There is little justification for exclusion of another 40,000 acres along the western boundary of the WSA. The "coal conflict" is a poor reason because the entire WSA contains less than 1 percent of the Kaiparowits coal field. Of the coal contained in the WSA, 70 percent is in a small 8,000-acre portion (leased section) in the northwestern corner. The mineral resources in the remaining 30,000 acres are extremely minuscule.

**35.5 RESPONSE:** The Proposed Action in the Final EIS (91,361 acres) has been revised slightly from that in the Draft EIS (92,441 acres). The rationale includes both the potential for conflict with future coal extraction, as well as the consideration of wilderness values. The Proposed Action includes the lands with the highest wilderness qualities and minimizes potential conflicts. It is considered by BLM to be a reasonable balancing of various land and resource uses.

**35.6 COMMENT:** It appears that BLM dropped part of this WSA from wilderness consideration because of coal potentials and the desire for mining development. The Draft EIS points out, however, that coal mining would be difficult here because of: (1) poor accessibility, (2) lack of water resources, (3) high operational costs, and (4) high impact to the surrounding environment. [Sierra Club, Cache Group]

**35.6 RESPONSE:** See the response to Specific Comment 26.24.

**35.7 COMMENT:** We thank BLM for including 92,441 acres of this WSA into their proposal, but we strongly support and recommend to BLM the Utah Wilderness Coalition's proposal of 146,000 acres of the 146,143-acre WSA. This proposal deletes all potential conflicts from coal operations. We are especially concerned about the following areas being left out:

(1) Rogers Canyon and (2) Straight Cliffs. [Sierra Club, Cache Group]

**35.7 RESPONSE:** The All Wilderness Alternative of 146,143 acres does not delete potential conflicts from future coal operations. See the impact analysis narrative regarding the long-term coal potential.

The east side of Rogers Canyon and the majority of the Straight Cliffs are included for wilderness designation in BLM's Proposed Action.

**35.8 COMMENT:** Fifty Mile Mountain WSA is the largest and clearly one of the premier WSAs in Utah. Remote, isolated, and incredibly diverse, Fifty Mile Mountain is spectacular wilderness on a grand scale. Fifty Mile Mountain is the highest large land mass in the lower Glen Canyon region and it thus exhibits a landscape and climate unique to the region. Vegetative communities ranging from desert-shrub to stands of aspen, maple, and oak typify this uniqueness. Unfortunately BLM's attempt to minimize acreage--and frankly there is simply no other explanation for a 92,441-acre recommendation--belittles the importance of the entire unit. It is completely erroneous for BLM to find 50,000+ acres of the Fifty Mile Mountain WSA unsuitable for wilderness because of a coal conflict when the entire unit contains less than 1 percent of the Kaiparowits coal resource. This recommendation is indicative of an attitude of "mineral absolutism." BLM's stated objective of the Proposed Action is "to eliminate potential management conflicts with coal development." Where is the "potential management conflicts with coal development" along 15,000 acres of the Straight Cliffs and associated benchlands that are "unsuitable"? There is no coal nor are there any conflicts in this portion of the WSA. [Utah Wilderness Association]

**35.8 RESPONSE:** See the response to Specific Comment 35.5. BLM's Proposed Action of 91,361 acres includes essentially all of the high country in the WSA, and portions of the adjacent lower drainages.

**35.9 COMMENT:** Part of the objective for the Partial Wilderness Alternative (51,540 acres) is to eliminate potential conflicts with uranium development. It does not seem that the potential for uranium is great enough to further reduce the size of the suitable portion. The EIS states that the formations underlying the WSA are "relatively unfavorable uranium host rocks" and "the likelihood of development is thought to be minimal because of economic considerations



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)

(e.g., transportation, low potential, etc.)." The estimates of surface disturbance from uranium development further show the low potential for development. If only 40 acres out of the 65,000 acres that are currently under mining claims are expected to be disturbed, there cannot be a high potential for development. [Rex and Judy Wells]

**35.9 RESPONSE:** Although uranium potential exists in portions of the WSA, it is not a significant determinant in the rationale for the Proposed Action. See Appendix 11.

**35.10 COMMENT:** The only reason that this entire high quality wilderness area is not recommended for formal wilderness designation is that some parts of it sit over a layer of coal. This is why Mudhole, Monday, Croton, Rogers, and Sunday Canyons were dropped from the recommendation. The Draft EIS states however, that higher quality coal is available nearby in less sensitive areas. It also states that problems of coal development include high costs, lack of accessibility, and a severe dearth of water. The situation of the coal-bearing strata would necessitate strip mining. This would be completely unacceptable. This arid and fragile land would never recover from this horrendous assault. I am totally opposed to strip mining in this WSA. The wilderness values of this popular recreation area far outweigh any short-term economic benefits from coal development. I sincerely hope that the Final EIS will include a thorough and intelligent "All Wilderness" recommendation for the Fifty Mile Mountain wilderness. [Scott DeLong]

**35.10 RESPONSE:** See the response to Specific Comment 26.24. Future coal mining would be by underground methods and access would be from drainages or at the base of the Straight Cliffs where the coal could be most easily accessed. The BLM Proposed Action includes Mudhole, Monday, Sunday, and part of Rogers Canyon in the area that would be designated as wilderness. Croton and part of Rogers Canyon would not be designated.

**35.11 COMMENT:** BLM's proposal fails to protect Rogers Canyon, the only perennial stream identified in the Draft EIS. The proposed boundary, which in places follows the canyon rim but in others excludes sections of the canyon, as well as part of Fifty Mile Mountain itself, has created an unmanageable situation and an unacceptable boundary. The WSA boundary is far more manageable and does not include any significant resources. In addition, the canyon rim propos-

ed boundary does not include nor protect many of the unnamed tributaries to Rogers Canyon. Rogers Canyon is the major canyon system on Fifty Mile Mountain and should be protected in its entirety. Why is it more important to develop such a tiny amount of minerals than to protect 30,000-40,000 acres of wilderness? This hardly rings of multiple use. [Utah Wilderness Association]

**35.11 RESPONSE:** BLM's Proposed Action includes the east part of Rogers Canyon, including the major tributary, Basin Canyon. BLM believes that the boundary above the west rim of Rogers Canyon would be a manageable boundary which is readily discernable on the ground.

**35.12 COMMENT:** BLM gives no explanation for excluding lands within and around Croton Canyon in the extreme southwest of the WSA. This lower elevation canyon terrain adds diversity to the recommendation and the WSA boundary makes a far more manageable boundary than the proposed boundary. [Utah Wilderness Association]

**35.12 RESPONSE:** BLM has determined that the lands along the southwest edge of the WSA, including Croton Canyon, do not have outstanding opportunities for solitude and primitive recreation.

**35.13 COMMENT:** Highly subjective generalizations are made on impacts on nondesignation of wilderness. It is not possible from BLM discussions of these impacts to differentiate these impacts from any other location. No cumulative impact analysis is performed which describes in resource quantities the loss under development. [Utah Wilderness Coalition]

**35.13 RESPONSE:** The impacts of nondesignation are explained specifically for Fifty Mile Mountain in the analysis of the No Action/No Wilderness Alternative. Cumulative impact analysis is contained for the various Statewide alternatives, including Fifty Mile Mountain, in Volume I.

**35.14 COMMENT:** A majority of the lands deleted have no manageability or conflict problems. In an unbalanced wilderness study, BLM inventory and analysis stresses mineral conflicts. Absent is comprehensive wilderness resource inventories on wildlife, historic values, and other resources. Other deleted lands containing coal or marginal uranium deposits are claimed by BLM to outweigh the wilderness values. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

**35.14 RESPONSE:** See the responses to Specific Comments 33.48, 35.5, and 35.9, and General Comment 9.6. The EIS describes wildlife, historic values, and other resources. No additional inventories are necessary to adequately address the issues and major decision factors.

**35.15 COMMENT:** "Marginal wilderness quality" rationale was used by BLM to justify deletion of numerous acres of lands that have no identified conflicts or management problems. The use of a wilderness rating to support dropping areas that already meet the mandatory wilderness criteria is in direct violation of the Wilderness Study Policy. [Utah Wilderness Coalition]

**35.15 RESPONSE:** See the responses to General Comment 22.3 and Specific Comment 30.35.

**35.16 COMMENT:** Significant stands of aspen are present which represent the biological diversity of southern Utah. [Sierra Club, Cache Group]

**35.16 RESPONSE:** The presence of aspen is noted in the vegetation part of the description of the existing environment.

**35.17 COMMENT:** BLM has inappropriately limited diversity considerations to the general Bailey Kuchler classification system. This classification system is not intended to identify diverse ecosystems. In the inventory BLM deleted all areas not containing dense forests or rugged topography. Many critical ecosystems were lost in the inventory by misapplication of the wilderness solitude and recreation opportunity criteria. Ecosystems are not judged by BLM upon geologic, water resource, and wildlife considerations. The ecosystem classification technique used by BLM leaves only one ecosystem identified to represent almost all WSAs, pinyon-juniper. [Utah Wilderness Coalition]

**35.17 RESPONSE:** See the response to General Comment 13.7. Use of the Bailey-Kuchler system is consistent with Forest Service and other wilderness studies.

**35.18 COMMENT:** Atwood beardtongue (*Penstemon atwoodi*), a sensitive species, is known to occur in the upper Rogers Canyon (recommended to be deleted). BLM has not conducted any comprehensive rare and endangered species inventory required by the BLM planning process. [Utah Wilderness Coalition]

**35.18 RESPONSE:** The EIS notes the presence of the Atwood beardtongue as well as other sensitive plant species which are known or may occur in the WSA. Special inventories for rare and endangered species are not specifically required by BLM planning process. See the response to General Comments 13.1 and 13.8. Inventories of threatened, endangered, or otherwise sensitive plant species are being conducted as funds and time allow.

**35.19 COMMENT:** According to the figures in the oil and gas section, 42,343 acres of the WSA are closed to leasing and 117,800 acres are leased. This means that at least 14,000 acres of leases are within areas closed to leasing (16,550 acres). We assume these leases may have been issued prior to the closure being established, but this is not explained. It is stated that 38 leases on 24,400 acres are pre-FLPMA. Since these leases will have to expire before or on 10/21/86 unless held by production, the number and acreage of pre-FLPMA and total leases will have to be revised in the Final EIS. [Rex and Judy Wells]

**35.19 RESPONSE:** All information related to oil and gas leases has been updated and revised in the Final EIS.

**35.20 COMMENT:** BLM is correct in considering invalid mining claims that have not met the necessary requirements. [Utah Wilderness Coalition]

**35.20 RESPONSE:** See the responses to General Comments 15.28 and 15.32.

**35.21 COMMENT:** Interestingly, BLM, in its proposed alternative, has failed to include the Burning Hills and Death Ridge WSAs. These areas also include portions of the Kaiparowits Plateau coal deposits. These areas are bracketed by the Wahweap WSA to the west and by the Fifty Mile Mountain WSA to the east. If both the Wahweap and the Fifty Mile Mountain WSAs are designated as wilderness, the likelihood of developing the 2,528 billion tons of coal located within the Burning Hills and Death Ridge WSAs will be significantly reduced. The buffer policy of protection for the Wahweap and Fifty Mile Mountain areas will severely limit the development potential for both Burning Hills and Death Ridge. Any activities within the Burning Hills and Death Ridge areas will likely be regulated to such an extent as to make them de facto wilderness areas. [Utah Mining Association]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

**35.21 RESPONSE:** See the response to Specific Comment 26.3. Coal mining in areas near the proposed Fifty Mile Mountain wilderness area would be by underground methods and could be done in such a manner so as to have negligible, if any, affect on the wilderness values.

**35.22 COMMENT:** For example, BLM's proposed alternative includes designation of the majority of the Wahweap and Fifty Mile Mountain WSAs as wilderness. Both of these WSAs contain coal deposits on or adjacent to the Kaiparowits Plateau. By BLM's own figures, the inclusion of these WSAs would prohibit the extraction of approximately 1,147,000,000 tons of coal. Both of these areas received "f4" and "c4" ratings under BLM's overall importance rating system. To support its contention that this coal resource should remain undeveloped, BLM suggests that development of the resource will create significant economic and environmental difficulties. The majority of these economic and environmental difficulties are the direct result of BLM's current management of practically the entire Kaiparowits Plateau as a WSA. Valuation of these deposits should be based upon the willingness of the lessees of the 25 current coal leases within these WSAs to continue to make rental payments. Valuation should not be diminished by artificial BLM-created obstacles. [Utah Mining Association]

**35.22 RESPONSE:** See the responses to Specific Comment 26.26.

**35.23 COMMENT:** Uranium exploration in the early 1980s may have encountered commercial ore grades in the Morrison Formation in this WSA. [State of Utah]

**35.23 RESPONSE:** The mineral information in the EIS reflects known and documented exploration data for uranium.

**35.24 COMMENT:** We agree with the conclusion that oil and gas resources in WSAs will be essentially foregone under the so-called "preferred alternative." Specifically, our company concludes that inclusion of the following WSAs would adversely affect potential hydrocarbon exploration and development: Canaan Mountain, Parunuweap Canyon, Moquith Mountain, Paria-Hackbury, Wahweap, Burning Hills, and Fifty Mile Mountain. Enclosed is a geologic overview and critique of the Greater Kaiparowits Basin in Southern Utah. This report was prepared by Daniel D. Tisoncik, Senior Staff Geologist, Champlin Petroleum Company.

His report cites the 21 million barrel Upper Valley field in Garfield County. [Champlin Petroleum Company]

**35.24 RESPONSE:** See the response to Specific Comment 26.29.

**35.25 COMMENT:** All development is seen by BLM as economically beneficial. No data or analysis is given supporting this. Existing studies on major coal development in Carbon and Emery Counties in Utah are not used to estimate the serious negative impacts local areas face. [Utah Wilderness Coalition]

**35.25 RESPONSE:** The analysis of the No Action/No Wilderness Alternative notes the impacts from future coal development. Both beneficial and adverse impacts are included. Existing analyses of the impacts of coal development have been referenced.

**35.26 COMMENT:** It is stated that it is assumed in this alternative (All Wilderness) that diligent development will not occur before the leases expire. Thus, these leases will expire (although the dates of expiration are not given). Since leasing is a discretionary action, the leases would not have to be reissued and development could not occur unless the areas are leased. This would also apply to areas that are not currently leased. Thus, an equally likely situation as the worst-case analysis would be no development of coal, but this is not addressed. This potential for no development also applies to oil and gas. It is entirely possible that all oil and gas leases will expire without any development. As with coal, oil and gas leasing would be discretionary. It should also be noted there is currently a prohibition of new leasing in lands under wilderness review. Depending on when Congress actually makes a decision on this WSA, it is possible no coal or oil and gas leases will exist in the WSA. [Rex and Judy Wells]

**35.26 RESPONSE:** The analysis is based on the assumption that coal markets will not support commercial extraction of coal in the short term (i.e., prior to the year 2020). It also is based on the assumption that oil and gas discovery in the WSA would not occur, due to the relatively low potential. These assumptions are used in the analysis of the No Action/No Wilderness Alternative which then allows for the comparison of environmental and resource use effects resulting from the other alternatives. For the No Action/No Wilderness Alternative, it is projected that existing coal and oil and gas leases likely would

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

expire. Coal development in the long term would result from new leases, which may or may not be in the same locations as the current leases. The analysis is based on the known and estimated resource, not on the fact that past (but nonproducing) leases have been issued.

**35.27 COMMENT:** The Alton coal field illustrates many of the problems inherent in developing southern Utah coal. Part of this field was designated unsuitable for strip mining by the U.S. Office of Surface Mining, owing to severe environmental constraints, including adverse impacts on visual resources, hydrologic impacts, and difficult revegetation. The latter problem is significant; Federal law prohibits surface coal mining in areas where native vegetation communities cannot be reestablished and maintained. Throughout southern Utah, but particularly in the severe climates and thin soils of wildland areas, revegetation may well be a fantasy. [Utah Wilderness Coalition]

**35.27 RESPONSE:** See the response to Specific Comment 26.27.

**35.28 COMMENT:** It would be helpful to know the expiration date of the existing coal leases in the WSA. Since they were issued in 1967, they should be about due to expire. [Rex and Judy Wells]

**35.28 RESPONSE:** See the response to Specific Comment 35.26. The expiration dates of the various leases depend on the specific terms and conditions of each lease, and on a variety of regulatory changes since leases were issued. Expiration will depend on a complex set of circumstances, and precise dates have not been determined.

**35.29 COMMENT:** The coal section states "over the long term there is a high potential for coal development". Previously the EIS states that development of the Kaiparowits coal field will face significant economic and environmental problems including poor accessibility, lack of abundant water, high costs of underground mining, and competition of nearby areas where coal is more readily available and of better quality. This would tend to make us believe coal development of the Kaiparowits coal field is possible, but not necessarily a high potential. Even if coal development in this general area would occur, it seems debatable whether or not it would occur in the WSA because of "competition from other coal fields and other portions of the Kaiparowits coal field." [Rex and Judy Wells]

**35.29 RESPONSE:** See the responses to Specific Comments 26.10, 26.24, 26.25, 26.26, 26.30, and 26.31.

**35.30 COMMENT:** BLM incorrectly assessed the management of mining activities allowed in wilderness areas. BLM also did not detail the surface management stipulations for wilderness designation that exists or will be in place on coal leases. Although raised as an issue, BLM did not consider the ability of BLM to manage the lands not designated wilderness. Under the development proposed by BLM, management resources are likely to be insufficient. [Utah Wilderness Coalition]

**35.30 RESPONSE:** Impacts from mining are correctly assessed, based on specified assumptions and available data. Surface management limitations are explained in the EIS, particularly in Appendix 1. The future capabilities of BLM to administer minerals activities is not germane to the recommendations regarding wilderness designation. BLM has determined that the Fifty Mile Mountain WSA (as well as the Partial Wilderness Alternatives) would be manageable as wilderness, if so designated by Congress.

**35.31 COMMENT:** Management problems are claimed to be present by BLM on development in 190 uranium mining claims. With no supporting authority given, BLM incorrectly argues that mining cannot be controlled in designated wilderness. A majority of these and other claims do not exist over accessible uranium deposits. DOE's analysis concludes that isolated deposits may exist in the Jurassic Morrison Formation. This deposit only surfaces in the claims along the lower part of the Straight Cliffs. DOE indicates that only deposits that can be reached at the surface offer possibility for development. Much of the exposed Jurassic Morrison Formation was deleted in the intensive inventory. The deletions supported by BLM's claim of management problems exceed the area containing potentially developable uranium. [Utah Wilderness Coalition]

**35.31 RESPONSE:** See the responses to Specific Comment 35.9 and General Comment 1.13.

**35.32 COMMENT:** The area not included in the partial alternative includes the post-FLPMA exploration activities performed by Exxon. These intrusions appear to have been allowed by BLM with the unstated intent of not recommending that portion of the area for wilderness. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

**35.32 RESPONSE:** The Exxon exploration actions are not related to the rationale for BLM's Proposed Action. See Appendix 11 in Volume I of the Final EIS.

**35.33 COMMENT:** BLM does not recommend the western part of the WSA due to potential coal resources. Since much of the coal requires deep mining, a large part of the surface area over the coal deposits may not have significant impacts even if mining occurs. BLM ignores the delinquency of the lease holders who have not met diligent development requirements. A majority of the present leases have never seen any development. No analysis is made of the economic feasibility of development or the availability of other areas outside the WSA for coal development. [Utah Wilderness Coalition]

**35.33 RESPONSE:** See the responses to Specific Comments 35.26, 35.28, and 35.29.

**35.34 COMMENT:** "The northern boundary was adjusted to permit private industry an opportunity to explore for and possibly develop previously unknown mineral values." Here BLM proposed to delete known high quality wilderness lands because of completely unknown mineral values. Mineral analysis indicates that the possibility of a usable deposit is extremely small. This deletion is in conflict with the Wilderness Study Policy. [Utah Wilderness Coalition]

**35.34 RESPONSE:** The BLM Proposed Action results from the consideration of wilderness qualities and mineral potential. Adjustments in the boundary of the proposed Partial Wilderness Alternative to allow for nonwilderness uses, such as mineral exploration, is consistent with the Wilderness Study Policy. The policy does not require that all WSA lands be proposed for designation.

**35.35 COMMENT:** BLM fails to identify if the mineral conflicts are feasible in the foreseeable future. The information presented on uranium indicate that the resource is of dispersed small deposits which require expensive extraction beyond economic resources. Exploration has been conducted and has not found any significant outcroppings or groupings. The grade of ore (0.0%) is so low in quality that this is the least likely deposit to be developed even if the uranium industry can turn around. This is an excellent example of how BLM uses an infeasible mineral development to justify dropping primitive wilderness areas. BLM is inconsistent in both proving this development is insignificant and then listing it as a significant consequence in the

table for this area. BLM should only list feasible developments in the table of consequences of their recommendation. [Utah Wilderness Coalition]

**35.35 RESPONSE:** See the response to Specific Comment 35.9. The EIS does indicate that locatable mineral extraction from the WSA is not anticipated in the short term. The EIS states that coal development from the Kaiparowits Plateau is projected for the long-term future. It is considered to be feasible on a long-term basis.

**35.36 COMMENT:** In analyzing the Fifty Mile Mountain WSA, Table 1 states that loss of 147 million tons of coal recovery would be a significant impact of the "All Wilderness Alternative," even though the text states that only "about one-third to one-half of this coal deposit would be recoverable." The loss of 1,709 tons of uranium oxide is also listed as an impact of the "All Wilderness Alternative," despite the conclusion in the text that "the Chinle and Morrison Formations (the only rock units within the WSA considered favorable for uranium in south-central Utah) are relatively unfavorable uranium host rocks in the Kaiparowits Plateau region." Again, Table 1 states that recovery of 3 million barrels of oil and 18 billion cubic feet of natural gas would be foregone under the "All Wilderness Alternative" even though according to the text, "there is no evidence indicating the existence of commercially recoverable oil and gas resources within the WSA." On the other hand, the wilderness values on Fifty Mile Mountain are very much in evidence, yet impacts to them seem to be underestimated. If we go along with BLM's assumption that all of these (mostly low-potential) minerals, which underlay 78,300 acres of the WSA, will be recovered, then it seems that the 2,365 acres of lost wilderness values attributed to mineral-related activities is an understatement. [Joelle Buffa]

**35.36 RESPONSE:** The presence and extent of the coal resource is relatively well known. Uranium and oil and gas are not considered to be substantial factors in determination of the Proposed Action for the Fifty Mile Mountain WSA. Wilderness values are described based on the judgment of BLM field people. The proposed Partial Wilderness Alternative is considered to be a reasonable balance among various resource use considerations.

**35.37 COMMENT:** Although one may appreciate BLM's attempt to determine ways in which wildlife habitat may be improved, the attempt must be

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

tempered with reality. Several WSAs state that water or some other resource factor "limits" wildlife in the WSA, and that an improvement or manipulation of the limiting factor will be beneficial to wildlife. Although resource population limitation has been a traditional tenet in wildlife biology, Wiens (1984) reviews the subject and concludes that "there is surprisingly little direct evidence of clear resource limitation in natural populations (page 417)." If there are only a handful of studies demonstrating unambiguous limiting factors for single populations, then it is spectacularly unfounded to assert that a limiting factor affects communities of animals. The data available is simply not sufficient to define such a unifying concept for communities. From a land use or management standpoint, BLM's use of limiting factors is especially misleading because it creates the impression that the proposed manipulation or improvement will benefit all wildlife. A given resource such as water may be limiting for one or two species, but until much more data is available there is no basis to propose a limiting factor for the wildlife in a WSA. [Scott Mills]

**35.37 RESPONSE:** See the response to General Comment 16.12.

**35.38 COMMENT:** The area contains important habitat for mountain lions, endangered peregrine falcons, and bighorn sheep. [Sierra Club, Cache Group]

**35.38 RESPONSE:** The presence of these species is noted in the EIS under the Wildlife heading in the description of the Affected Environment.

**35.39 COMMENT:** BLM hasn't completed the required wildlife inventory indicated. BLM does not indicate if the wilderness boundaries include or exclude critical habitat or nesting areas. [Utah Wilderness Coalition]

**35.39 RESPONSE:** Specific wildlife inventories are not required for the EIS or for the wilderness study process. No crucial habitat occurs in the WSA. See the response to Specific Comment 26.39.

**35.40 COMMENT:** The analysis of impacts on future range developments is different than presented for other WSAs. For example, in the North Escalante Canyons/The Gulch ISA, it was assumed that proposed fences and spring developments would be allowed under the All Wilderness Alternative, but in this section, the impact is "unknown." [Rex and Judy Wells]

**35.40 RESPONSE:** See the response to Specific Comment 33.42.

**35.41 COMMENT:** We do not understand why the average actual livestock use and the revenues generated from grazing in the WSA are unknown. Permits are required to submit actual use figures to BLM and are billed accordingly. [Rex and Judy Wells]

**35.41 RESPONSE:** See the response to Specific Comment 29.37.

**35.42 COMMENT:** The amounts from livestock sales and ranchers' returns to labor and investment are the same as identified under the No Action Alternative. Therefore, the proposed improvements that would be foregone would not cause a significant impact. We would also question whether the improvements are really necessary since they do not appear to provide a positive return. [Rex and Judy Wells]

**35.42 RESPONSE:** See the response to Specific Comment 31.69.

**35.43 COMMENT:** After seeing so many disgusting wilderness proposals in the Cedar City District, I suppose I should be overjoyed at seeing a WSA where only 37 percent is thrown out without cause. "BLM's visual resource inventory classified approximately 135,343 acres as exceptional (Class A) and 10,800 acres as high to moderate quality (Class B) scenery. The entire WSA is a VRM Class II Management Area." This visual resource inventory apparently was done after the draft SSA was issued since it is a major upgrading of the scenic quality rating of the WSA. Why weren't the other Cedar City District WSAs reinventoried at the same time since they also have scenic quality ratings that are too low? This WSA has the greatest amount of Class A scenic quality area in the State, yet BLM is not proposing to include all of it in the wilderness recommendation. [Owen Severance]

**35.43 RESPONSE:** See the responses to General Comment 19.1 and Specific Comments 31.52 and 31.53.

**35.44 COMMENT:** BLM has not performed the required archeological survey required by the planning process. [Utah Wilderness Coalition]

**35.44 RESPONSE:** See the responses to General Comment 20.2 and Specific Comment 33.48.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

**35.45 COMMENT:** BLM should remember that a large portion of this WSA is included in the Fifty Mile Mountain Archeological District. This district has been nominated for the National Register of Historical Places. BLM notes that, "there is a high probability of additional significant archeological sites outside the district." Wilderness designation will best protect these unknown archeological resources and the integrity of the archeological district. [Sierra Club, Cache Group]

**35.45 RESPONSE:** The archeological district and the potential for other sites are described in the EIS and were considered in formulating BLM's Proposed Action for wilderness designation.

**35.46 COMMENT:** Fifty Mile Mountain WSA is considered to have both high wilderness values and conflicts. The 51,540-acre partial alternative significantly reduces conflicts with the coal resource. An additional adjustment, moving the boundary off the Straight Cliffs to the top of Fifty Mile Mountain, would minimize future range conflicts. Fifty Mile Mountain is considered to be second among all 83 WSAs in cultural resource importance. Regardless of the final designation resolution, the cultural resources of the Fifty Mile Mountain area should be considered for protection. [State of Utah]

**35.46 RESPONSE:** The comment relative to coal conflicts is reflected in the EIS analysis for that Partial Wilderness Alternative. BLM has not identified significant conflicts with livestock grazing for any of the alternatives. The importance of cultural resources is recognized; however, these would be protected regardless of wilderness designation. See the response to General Comment 20.1.

**35.47 COMMENT:** One activity consistently underrated by BLM is hunting. Utah has the second highest number of hunters in the field during hunting season. California is the highest. With the lower population, Utah's hunting opportunities are nationally of the highest standard. A large amount of this hunting occurs on BLM lands. [Utah Wilderness Coalition]

**35.47 RESPONSE:** Current use of the Fifty Mile Mountain WSA for hunting is very low.

**35.48 COMMENT:** This is an unusual wild tract of lush plateaus, aspen groves, broken canyons, desert lands, and archaeological treasures. The area is irreplaceable habitat for bighorn sheep and cougar, both

of which would benefit from wilderness status. The BLM's 92,441-acre wilderness proposal would leave out important side drainages of Rogers Canyon and all of the famed Straight Cliffs. [Clifton Merritt]

**35.48 RESPONSE:** The characteristics of the WSA and the presence of bighorn sheep and cougar are described in the EIS. BLM's Proposed Action would designate Rogers Canyon, including the major side drainage (Basin Canyon), and it would include the major part of the Straight Cliffs. See the responses to Specific Comments 35.4, 35.7, 35.8, and 35.11.

**35.49 COMMENT:** The vast majority of this WSA should be designated wilderness. There is no sense to statements suggesting that anything less than outstanding solitude may be found throughout this area, where half the days of the year there is not a soul in the whole WSA. This area practically comes with a written guarantee for solitude. Likewise, the nearly limitless opportunities for hikes, explorations, scenic vistas, rockhounding, and archaeological study, etc., throughout the WSA give it outstanding opportunity for a wide variety of wilderness recreational activities. I can see no reason to limit these opportunities to the top of the Straight Cliffs as Fifty Mile Bench is an interesting place to hike, look for fossils, view archaeological sites, etc. The cliffs themselves are a prominent scenic landmark which can only be viewed effectively from below the rim. Likewise the highest point of Fifty Mile Mountain is excluded from BLM's proposal. It is from here that the best view of the canyons and mountains to the north can be had. Many of the side canyons eliminated on the west side of the WSA are of the same outstanding character of those included in BLM's proposal. Particularly the benches of Little Valley, Croton Canyon, and adjacent canyons and benches should be included. [Michael Van Note]

**35.49 RESPONSE:** BLM proposes that 91,361 acres be designated as wilderness because this designation would reduce conflicts with coal development while protecting most of the area's wilderness values. In forming this alternative, the portions of the WSA with outstanding opportunities for solitude and primitive recreation were included where possible within a manageable boundary.

**35.50 COMMENT:** Apparently the reason for the lack of solitude is the presence of coal. (That does it every time in the Cedar City District.) The Cedar City District's creative definition of solitude isn't spelled out in the Draft EIS, but it still seems to be

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

limited to "screening" even though the "WSA is one of the largest WSAs in Utah." I disagree with the Draft EIS's assessment of primitive recreation values also; however, the Draft EIS is too vague about the locations where outstanding opportunities for primitive recreation are lacking to permit a detailed response. Outstanding opportunities exist throughout the WSA. It is obvious that the entire WSA contains outstanding visual resources and special features along with outstanding wilderness values. BLM should change its Proposed Action to All Wilderness. [Owen Severance]

**35.50 RESPONSE:** The determination of solitude is not dependent on the presence or absence of coal. Also, see the response to Specific Comment 32.28.

**35.51 COMMENT:** Under Special Features, is not the unique landscape alone in a sea of rock enough of a value to be considered special? [Michael Salamacha]

**35.51 RESPONSE:** Certain scenic aspects of the landscape are identified as special features, but the landscape in general is not considered to be unique or a special feature.

**35.52 COMMENT:** There are two important arches found here that will only receive adequate protection through wilderness protection. These arches are: (1) Window Wind Arch and (2) Woolsey Arch. [Sierra Club, Cache Group]

**35.52 RESPONSE:** The arches are mentioned in the EIS. Wilderness designation is not the only management option that would adequately protect the arches.

**35.53 COMMENT:** Is it possible for us to believe that 77,143 acres do not possess outstanding opportunities for solitude. The size of this WSA was one factor mentioned in the intensive inventory as contributing to outstanding opportunities for solitude throughout the WSA, but this factor is conveniently missing in the EIS discussion. [Rex and Judy Wells]

**35.53 RESPONSE:** The size criteria states that wilderness areas must be islands or land tracts of at least 5,000 acres. The size criteria does not necessarily relate directly to determination of outstanding opportunities for solitude.

**35.54 COMMENT:** BLM produced no map showing which areas it thought had outstanding wilderness values and which had even more than that. BLM also failed to show on a map where the conflicts were locat-

ed. Without location information, it is impossible to tell if BLM's arguments match the recommendations on the ground. The "outstanding wilderness" rating system BLM uses comes without any methodology given and no written record of its application. This rating system violates the Wilderness Study Policy and should be stricken from the study process and this EIS. [Utah Wilderness Coalition]

**35.54 RESPONSE:** Maps showing the location of wilderness values and conflicts are not essential to the EIS analysis because pertinent locations are pointed out in the narrative. Also, see the responses to Specific Comments 30.35 and 35.49. BLM's Wilderness Study Policy requires the determination of outstanding opportunities for solitude and outstanding opportunities for primitive and unconfined recreation.

**35.55 COMMENT:** Wilderness designation for this area will complement the existing Glen Canyon NRA. From within this area one can experience breathtaking views of Lake Powell. [Sierra Club, Cache Group]

**35.55 RESPONSE:** The relationship of the WSA to the Glen Canyon NRA is explained in the EIS.

**35.56 COMMENT:** BLM has viewed the opinion of county officials as adopted land use plans. Local government land use plans are more platforms for political philosophies than objective analysis of future planning. This area abuts Glen Canyon NRA. That part of the NRA that is adjacent is recommended for wilderness designation by the NPS. In all WSAs in this District, there isn't a single case where nonwilderness designation would conflict with any plan. [Utah Wilderness Coalition]

**35.56 RESPONSE:** See the responses to General Comment 23.8 and Specific Comment 25.23.

**35.57 COMMENT:** In all Cedar City draft analyses the following categorical disclaimer appears: Designation of the WSA as a wilderness area would not provide any multiple resource benefits whose continued viability could be ensured only by wilderness designation. No documentation or discussion appears supporting this point. BLM makes no attempt to describe how coal development, open ORV use, and mining can be managed to protect the significant wilderness values and special features. In practice the major activities proposed to be allowed will dominate and prevent adequate impact mitigation. The current Draft



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

EIS avoids discussing this topic. [Utah Wilderness Coalition]

**35.57 RESPONSE:** Neither the Draft nor the Final EIS contain the sentence in question. The sentence was in a preliminary draft document which has been superceded. It is not considered to be pertinent to the EIS or to the Wilderness Study Reports.

**35.58 COMMENT:** The WSA includes some split estates (Volume I, Appendix 3). The existence of split-estate lands will affect the text elsewhere. Information on the split-estate lands was provided to BLM during the State's review of the SSAs. On Map 1 the legend for the State lands is wrong. On Map 3 cornered State sections should not be excluded as shown. Fourteen State sections (more acreage) likely would be acquired under the 51,540-acre alternative. [State of Utah]

**35.58 RESPONSE:** The maps and text have been revised.

**35.59 COMMENT:** Map 2 should show the boundary of the adjacent Glen Canyon NRA wilderness proposal. This also applies to Maps 3 and 4. [Rex and Judy Wells]

**35.59 RESPONSE:** The Glen Canyon NRA boundary was shown in the legends and on all three Draft EIS maps cited in the comment. Also, the boundary is shown on the new maps in the Final EIS. The adjacent NPS wilderness proposal is also shown on Pocket Maps 7 and 8.

**35.60 COMMENT:** How can the Red Canyon hot spring be 40 miles northeast of Scorpion and also be 40 miles northeast of Fifty Mile Mountain when the WSAs are at least 5 miles apart. [Brian Wood]

**35.60 RESPONSE:** See the response to Specific Comment 33.76.

**35.61 COMMENT:** The document states that under the 92,441-acre partial alternative, 64,774 acres possessing outstanding opportunities for solitude would be preserved. It indicates that all of the area meeting the standard for outstanding opportunities for solitude would be in the designated portion of the partial; however, later it is stated that a total of 69,000 acres possess outstanding opportunities for solitude. These figures are contradictory. It is also

unclear whether any primitive recreation acreage is within the partial. [State of Utah]

**35.61 RESPONSE:** The narrative in the Final EIS has been rewritten to clarify the situation with the partial alternatives.

**35.62 COMMENT:** Areas BLM assesses as having "medium or low wilderness value" are recommended to be dropped from the wilderness area. The EIS says that the western boundary was adjusted to "follow the cliff line to conform with high quality wilderness and the eastern boundary was adjusted to the base of the Straight Cliffs. The partial wilderness boundary description does not follow the map. The map indicates the proposed partial wilderness boundary on the east follows the top of the cliff. [Utah Wilderness Coalition]

**35.62 RESPONSE:** See the response to Specific Comment 35.3. The narrative has been revised for clarity in the Final EIS.

**36.63 COMMENT:** The UDWR has proposed to the BLM to stock elk in this area. Chukar are found in the WSA. [State of Utah]

**35.63 RESPONSE:** As of March 1988, the proposed Fifty Mile Mountain elk transplant has been dropped by UDWR. The presence of chukar is noted in the Final EIS.

**35.64 COMMENT:** The statement that the visual resource inventory classified "135,343 acres as exceptional (Class A)" seems to contradict page 28, Special Features paragraph 5 which states, "The aggregate area of outstanding scenic values in the WSA is about 19,200 acres." Can there be 116,143 acres of "exceptional" scenery (Class A is defined as "unusual or outstanding") which do not have outstanding scenic value? [State of Utah]

**35.64 RESPONSE:** The text has been revised. All Class A scenery is not included as a special feature.

**35.65 COMMENT:** Effects on cultural resources by development would not be minimal as stated. Past experience, i.e., Alkali Ridge, has shown development to be disastrous to cultural sites. [State of Utah]

**35.65 RESPONSE:** BLM recognizes that the cultural resources in the WSA could be impacted. See the Cultural Resources section for a discussion of

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 35: FIFTY MILE MOUNTAIN WSA (CONTINUED)**

anticipated impacts resulting from both designation and nondesignation.

**35.66 COMMENT:** Much more than 1,920 acres of State land should be exchanged. [State of Utah]

**35.66 RESPONSE:** The policy of the Utah Board of State Lands and Forestry (UBSL, 1987) is to reserve its position regarding exchange of in-held State lands within any particular WSA. Based on this policy regarding exchange of State lands, it is assumed that the in-held State lands would remain under existing ownership.

**SECTION A**  
**RED BUTTE WSA**

**A.1 COMMENT:** These 10 WSAs are ranked as a group, the Zion Units, and are considered natural, logical extensions of Zion National Park. There are land use conflicts in gas company reports: i.e., oil and gas potential in terms of reservoir storage for LaVerkin Creek Canyon, Deep Creek, North Fork Virgin River, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, Goose Creek Canyon, and Beartrap Canyon WSAs. An additional conflict is present in Spring Creek Canyon associated with the water supply for Kanarraville. Also, Washington County Conservancy District is considering construction of Bullock Reservoir immediately upstream from the north boundary of the North Fork Virgin River WSA. The county foresees increased hydroelectric capacity from Quail Creek and the proposed Bullock Reservoirs. Given the small size of the WSAs and their adjacency to Zion National Park, additional study should be given to the potential of transferring most of these WSAs from BLM to NPS management. [State of Utah]

**A.1 RESPONSE:** See the response to Specific Comment 15.2.

**A.2 COMMENT:** As park service employees at Zion National Park, we were always coming up against a problem of being able to manage whole ecosystems and whole drainages. So, I was really happy to see that BLM has set aside or requested that the areas of the upper canyons around Zion National Park would be designated as wilderness. For instance, the kind of thing that happens in Zion when you can't control drainage is that the NPS never knew how many fecal

ocliforms were going to be in the Virgin River where people were wading all the time and cattle would be coming through in the upper drainages. For this reason, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, LaVerkin Creek Canyon, and all of the other WSAs around the top are really important to be designated as wilderness for Zion National Park management. [Alice Lindahl]

**A.2 RESPONSE:** See the response to Specific Comment 15.3.

**A.3 COMMENT:** The mineral potential of this area is probably low. [State of Utah]

**A.3 RESPONSE:** The observation is noted. No mineral exploration or development is projected for Red Butte WSA in the EIS.

**A.4 COMMENT:** Peregrine falcon use of the area adjacent to Red Butte WSA (Hop Valley) has been observed. Nest sites are certainly found closer than Deep Creek, as mentioned in the EIS. [Bob Lineback]

**A.4 RESPONSE:** It is possible that nest sites may occur in addition to those noted in the EIS; however, BLM is not aware of any nest sites within or adjacent to Red Butte WSA.

**A.5 COMMENT:** This WSA includes critical deer winter range. Deer are also present in significant numbers during spring, summer, and fall. [State of Utah]

**A.5 RESPONSE:** Utah Division of Wildlife Resources has classified the area as "high priority" winter range, with deer migration patterns crossing past the butte. The Final EIS reflects this information.

**A.6 COMMENT:** For several of the small WSAs, we suggest it would be meaningful to discuss recent changes in use intensity which have taken place. For example, during studies in 1982, certain levels of use for these WSAs were identified which have since changed. These changes are as follows: [National Park Service]

WSA	Comparison between	
	1982	EIS
Taylor Creek	2 AUMs	20 AUMs
Deep Creek	246 AUMs	188 AUMs
Red Butte	784 acres	788 acres
	oil/gas lease	oil/gas lease
Orderville	No grazing	30 AUMs
Orderville	No mining claims	20 acres
Spring Creek Canyon	No grazing	30 AUMs

# SPECIFIC COMMENTS AND RESPONSES

## SECTION A: RED BUTTE WSA (CONTINUED)

We suggest the text analyze how such changes have affected the integrity of these WSAs.

**A.6 RESPONSE:** Livestock and minerals information for the Final EIS has been updated from that shown in the Draft EIS. The numbers used are the best information available. Changes in the data since 1982 have not been of sufficient magnitude to influence the integrity of, or BLM's Proposed Action for, any of the WSAs listed, including Red Butte WSA. See the appropriate WSA response sections for responses to questions on the remaining WSAs.

**A.7 COMMENT:** The Zion Canyon mountains and Parunuweap Canyon WSA should be designated as wilderness because there are unique species of aquatic invertebrates that live in the seeps and springs in those drainages. And it is something that adds a lot to the park and to scientific ways of looking at how animals evolve and change in isolated habitat. My own research has identified several new species of snails and many insects that live in and around areas mentioned that are near Zion National Park. [Alice Lindahl]

**A.7 RESPONSE:** Red Butte WSA contains no perennial surface water.

**A.8 COMMENT:** Page 18 of the EIS states, "The scenic special feature in this WSA should also be protected and preserved." This is inconsistent with page 12 which states, "No special features have been identified for the WSA." Is there a special feature in this area that was not mentioned? [State of Utah]

**A.8 RESPONSE:** The narrative in the Final EIS has been revised to recognize special features.

**A.9 COMMENT:** Map 3 should include Spring Creek Canyon, contiguous to the north end of Zion National Park. The amended map should be used wherever Map 3 appears in the Draft EIS, i.e., in analysis of the other Zion WSAs such as The Watchman. [State of Utah]

**A.9 RESPONSE:** Map 3 has been revised to include the Spring Creek Canon and Parunuweap Canyon WSAs.

## SECTION B SPRING CREEK CANYON WSA

**B.1 COMMENT:** I wonder if the Kanarraville pipeline should be in the WSA? Perhaps the boundary should be changed to create a small narrow nonwilderness corridor along the pipeline so that they can maintain it? Perhaps BLM could manage the corridor as a "natural" zone under the resource as a management plan and oversee the pipeline work and maintenance to prevent overenthusiastic water development adjacent to the wilderness? I have not seen the extent of the pipeline so do not have an adequate background on this issue. [Bob Lineback]

**B.1 RESPONSE:** The pipeline would be maintained as a pre-existing use under the terms of the right-of-way easement granted to the town of Kanarraville in 1969.

**B.2 COMMENT:** As park service employees at Zion National Park, we were always coming up against a problem of being able to manage whole ecosystems and whole drainages. So, I was happy to see that BLM has designated or requested that the WSAs of the upper canyons around Zion National Park be designated as wilderness. For instance, the kind of thing that happens in Zion when you can't control the whole drainage is that National Park Service never knew how many fecal coliforms were going to be in the Virgin River where people were wading all the time and cattle would be coming through in the upper drainages. For this reason, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, LaVerkin Creek Canyon, and all of the other WSAs around the top are really important to be designated as wilderness for Zion National Park management. [Alice Lindahl]

**B.2 RESPONSE:** See the responses to General Comments 3.23, 3.24, 7.2, 8.7, 14.9, 23.14, and 23.15, which address the relationships of NPS lands and BLM WSAs.

**B.3 COMMENT:** Erosion condition terms are not defined in the Glossary. It is hard to determine why the WSA's erosion condition is moderate at worst in Table 2, yet the soil is described in the text as poor, highly erodible, and fragile. [Brian Wood]

**B.3 RESPONSE:** The terms have been added to the Glossary. The condition describes the existing

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION B: SPRING CREEK CANYON WSA (CONTINUED)**

situation. Since there has been little disturbance in the WSA, there is only moderate erosion now occurring; but if disturbance were to occur, the condition may be severe due to poor and fragile soils.

**B.4 COMMENT:** The Zion Canyon mountains and Parunuweap Canyon WSA should be designated as wilderness in their entirety because there are unique species of aquatic invertebrates that live in the seeps and springs in those drainages. It is something that adds a lot to the park and to scientific ways of looking at how animals evolve and change in isolated habitat. My own research has identified several new species of snails and many insects that live in and around the areas mentioned that are near Zion National Park. [Alice Lindahl]

**B.4 RESPONSE:** Spring Creek Canyon WSA includes perennial water. See the responses to Specific Comments 15.2 and 15.3.

**B.5 COMMENT:** For several of the small WSAs, we suggest it would be meaningful to discuss recent changes in use intensity which have taken place. For example, during studies in 1982 certain levels of use for these WSAs were identified which have since changed. These changes are as follows: [National Park Service]

WSA	Comparison between	
	1982	EIS
Taylor Creek	2 AUMs	20 AUMs
Deep Creek	246 AUMs	188 AUMs
Red Butte	784 acres	788 acres
	oil/gas lease	oil/gas lease
Orderville	No grazing	30 AUMs
Orderville	No mining claims	20 acres
Spring Creek Canyon	No grazing	30 AUMs

We suggest the text analyze how such changes have affected the integrity of these WSAs.

**B.5 RESPONSE:** The Final EIS reports that the Spring Creek Canyon WSA is presently unallotted. See the appropriate WSA response sections for responses to questions on the remaining WSAs.

**B.6 COMMENT:** The mineral potential of this WSA is probably low. [State of Utah]

**B.6 RESPONSE:** The observation is noted. No mineral exploration or development is projected in the Final EIS for Spring Creek Canyon WSA.

**B.7 COMMENT:** Statements in several of the WSA descriptions such as, "No other threatened or endangered species are known to occur in the WSA" may be misleading if they cannot be supported with actual survey data. We believe this is important to be verified because many of the WSAs adjacent to Zion National Park are ideal peregrine falcon habitat. These include Parunuweap Canyon, Canaan Mountain, Deep Creek, Orderville Canyon, and Spring Creek Canyon WSAs. [National Park Service]

**B.7 RESPONSE:** Peregrine falcon habitat is identified in the description of the existing environment for wildlife in the WSAs listed, including Spring Creek Canyon.

**B.8 COMMENT:** How can grazing be one of the "best uses" for soils, yet the WSA is "not conducive" for grazing due to fragile soils, among other reasons? [Brian Wood]

**B.8 RESPONSE:** This discrepancy has been corrected. Grazing is no longer noted as one of the best uses.

**B.9 COMMENT:** The statement is made that several public comments were made on the Cedar, Beaver, Garfield, Antimony Resource Management Plan concerning Spring Creek Canyon WSA. Those comments and BLM's response could provide useful information. [State of Utah]

**B.9 RESPONSE:** Comments on the referenced plan are contained in the Final EIS for that document (USDI, BLM, 1984). There are two comments in that document which specifically mention Spring Creek Canyon WSA. Both comments request that Spring Creek be included in the wilderness study. Since Spring Creek Canyon WSA was in the Draft EIS, comments in the resource management plan Final EIS are no longer applicable.

**SECTION C**  
**THE WATCHMAN WSA**

**C.1 COMMENT:** We encourage BLM to add another 160 acres of land down to the river to include the complete cliff face of The Watchman WSA as proposed by the Utah Wilderness Coalition. This would protect an important natural feature that impresses many Zion National Park tourists. [Sierra Club, Cache Group]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION C: THE WATCHMAN WSA (CONTINUED)**

**C.1 RESPONSE:** The WSA boundary was determined during the inventory phase, which has been completed. See the response to General Comment 3.1.

**C.2 COMMENT:** As park service employees at Zion National Park, we were always coming up against a problem of being able to manage whole ecosystems and whole drainages. So, I was really happy to see that BLM has designated or requested that the areas of the upper canyons around Zion National Park be designated as wilderness. For instance, the kind of thing that happens in Zion National Park when you can't control the whole drainage is that the NPS never knew how many fecal coliforms were going to be in the Virgin River where people were wading all the time and cattle would be coming through in the upper drainages. For this reason, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, LaVerkin Creek Canyon, and all of the other WSAs around the top are really important to be designated as wilderness for Zion National Park management. [Alice Lindahl]

**C.2 RESPONSE:** The WSA does not have perennial surface water.

**C.3 COMMENT:** The mineral potential of this WSA is probably low.

**C.3 RESPONSE:** The observation is noted. No mineral exploration or development is projected in this EIS for The Watchman WSA.

**C.4 COMMENT:** The area is a logical extension of the NPS Zion wilderness recommendation. This is an important raptor habitat including bald eagle and peregrine falcon. [Utah Wilderness Coalition]

**C.4 RESPONSE:** The EIS includes the information presented in the comment.

**C.5 COMMENT:** Zion Canyon mountains and Parunuweap Canyon WSA should be designated as wilderness in their entirety because there are unique species of aquatic invertebrates that live in the seep and springs in those drainages. It is something that adds a lot to the park and to scientific ways of looking at how animals evolve and change in isolated habitat. My own research has identified several new species of snails and many insects that live in and around the WSAs mentioned that are near Zion National Park. [Alice Lindahl]

**C.5 RESPONSE:** The Watchman WSA contains no perennial surface water. See the responses to Specific Comments 15.2 and 15.3.

**C.6 COMMENT:** These 10 WSAs are ranked as a group, the Zion WSAs, and are considered natural, logical extensions of Zion National Park. There are land use conflicts in gas company reports (i.e., oil and gas potential in terms of reservoir storage in LaVerkin Creek Canyon, Deep Creek, North Fork Virgin River, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, Goose Creek Canyon, and Beartrap Canyon WSAs). An additional conflict is present in the Spring Creek Canyon WSA associated with the water supply for Kanarraville. Also, Washington County Conservancy District is considering construction of Bullock Reservoir immediately upstream from the north boundary of the North Fork Virgin River WSA. The county foresees increased hydroelectric capacity from Quail Creek and the proposed Bullock Reservoir. Given the small size of the WSAs and their adjacency to Zion National Park, additional study should be given to transferring management of most of these WSAs from Bureau of Land Management to National Park Service. [State of Utah]

**C.6 RESPONSE:** See the response to Specific Comment 15.2.

**C.7 COMMENT:** In the text on Naturalness: What is the visual impact of the transmitter? Does it impair wilderness values? [State of Utah]

**C.7 RESPONSE:** It has been determined that the transmitter does not significantly detract from wilderness values. It was installed with no surface disturbance prior to delineation of the WSA.

**C.8 COMMENT:** The Watchman WSA is the first and one of the most lasting views all park visitors receive. This cliff buttress forms an integral part of the park and its wilderness recommendation. This vertical cliff area requires no specific activities by BLM to be managed. The WSA is a graphic example of the abuse of manageability criteria in making unsuitable wilderness recommendations. [Utah Wilderness Coalition]

**C.8 RESPONSE:** The Watchman WSA is included in BLM's Proposed Action alternative for wilderness designation. It has not been judged to be unmanageable.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION C: THE WATCHMAN WSA (CONTINUED)**

**C.9 COMMENT:** There are several technical climbing routes in The Watchman WSA that are accessed via the WSA. Copies of these route descriptions and some technical climbing publications may be found at the Zion visitor center. [Bob Lineback]

**C.9 RESPONSE:** The opportunity for rock climbing is noted in the Final EIS.

**C.10 COMMENT:** The area has outstanding opportunities for solitude and primitive recreation; mineral resources are of secondary significance owing to problems of access, water availability, and difficult reclamation. [Utah Wilderness Coalition]

**C.10 RESPONSE:** About 75 percent of the WSA is considered to have outstanding solitude and primitive recreation. Also, see the response to Specific Comment C.3.

**SECTION D**  
**TAYLOR CREEK CANYON WSA**

**D.1 COMMENT:** These 10 WSAs are ranked as a group, the Zion WSAs, and are considered natural, logical extensions of Zion National Park. There are land use conflicts in gas company reports (i.e., oil and gas potential in terms of reservoir storage in LaVerkin Creek Canyon, Deep Creek, North Fork Virgin River, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, Goose Creek Canyon, and Beartrap Canyon WSAs). An additional conflict is present in the Spring Creek Canyon WSA associated with the water supply for Kanarraville. Also, Washington County Conservancy District is considering construction of Bullock Reservoir immediately upstream from the north boundary of the North Fork Virgin River WSA. The county foresees increased hydroelectric capacity from Quail Creek and the proposed Bullock Reservoir. Given the small size of the WSAs and their adjacency to Zion National Park, additional study should be given to transferring management of most of these WSAs from Bureau of Land Management to National Park Service. [State of Utah]

**D.1 RESPONSE:** See the response to Specific Comment 15.2.

**D.2 COMMENT:** As park service employees at Zion National Park, we were always coming up against a problem of being able to manage whole ecosystems

and whole drainages. So, I was happy to see that BLM has designated or requested that the WSAs of the upper canyons around Zion National Park be designated as wilderness. For instance, the kind of thing that happens in Zion when you can't control the whole drainage is that the NPS never knew how many fecal coliforms were going to be in the Virgin River where people were wading all the time and cattle would be coming through in the upper drainages. For this reason, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, LaVerkin Creek Canyon, and all of the other WSAs around the top are really important to be designated as wilderness for Zion National Park management. [Alice Lindahl]

**D.2 RESPONSE:** There is no perennial surface water in the WSA.

**D.3 COMMENT:** Zion Canyon mountains and Parunuweap Canyon WSA should be designated as wilderness in their entirety because there are unique species of aquatic invertebrates that live in the seep and springs in those drainages. It is something that adds a lot to the park and to scientific ways of looking at how animals evolve and change in isolated habitat. My own research has identified several new species of snails and many insects that live in and around the WSAs mentioned that are near Zion National Park. [Alice Lindahl]

**D.3 RESPONSE:** Taylor Creek Canyon WSA contains no perennial surface water. See the responses to Specific Comments 15.2 and 15.3.

**D.4 COMMENT:** For several of the small WSAs, we suggest it would be meaningful to discuss recent changes in use intensity which have taken place. For example, during studies in 1982 certain levels of use for these WSAs were identified which have since changed. These changes are as follows: [National Park Service]

WSA	Comparison between	
	1982	EIS
Taylor Creek	2 AUMs	20 AUMs
Deep Creek	246 AUMs	188 AUMs
Red Butte	784 acres	788 acres
	oil/gas lease	oil/gas lease
Orderville	No grazing	30 AUMs
Orderville	No mining claims	20 acres
Spring Creek Canyon	No grazing	30 AUMs

We suggest the text analyze how such changes have affected the integrity of these WSAs.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION C: THE WATCHMAN WSA (CONTINUED)**

**D.4 RESPONSE:** The EIS reported that there are only 20 AUMs of Federal forage in the allotment that covers the Taylor Creek Canyon WSA, but the entire WSA is unsuited for livestock grazing.

**SECTION E**  
**GOOSE CREEK CANYON WSA**

**E.1 COMMENT:** These 10 WSAs are ranked as a group, the Zion WSAs, and are considered natural, logical extensions of Zion National Park. There are land use conflicts in gas company reports (i.e., oil and gas potential in terms of reservoir storage in LaVerkin Creek Canyon, Deep Creek, North Fork Virgin River, Red Butte, Spring Creek Canyon, The Watchman, Taylor Creek Canyon, Goose Creek Canyon, and Beartrap Canyon WSAs). An additional conflict is present in the Spring Creek Canyon WSA associated with the water supply for Kanarraville. Also, Washington County Conservancy District is considering construction of Bullock Reservoir immediately upstream from the north boundary of the North Fork Virgin River WSA. The county foresees increased hydroelectric capacity from Quail Creek and the proposed Bullock reservoir. Given the small size of the WSAs and their adjacency to Zion National Park, additional study should be given to transferring management of most of these WSAs from Bureau of Land Management to National Park Service. [State of Utah]

**E.1 RESPONSE:** See the response to Specific Comment 15.2.

**E.2 COMMENT:** Why is 1976 the most recent year for which cougar kill data is available? [Brian Wood]

**E.2 RESPONSE:** The information in the EIS has been updated, using the Utah Cougar Harvest Book dated 1982-1983 (UDNR, DWR, 1983).

**E.3 COMMENT:** The Draft EIS neglects consideration of available cultural information from archaeological surveys on National Forest Service land to the north of the WSA. [State of Utah]

**E.3 RESPONSE:** The EIS acknowledges cultural resource values in the vicinity of the WSA. National Forest Service land is more than 10 miles from the WSA; therefore, information for sites at that location is not directly applicable to Goose Creek Canyon WSA.

**E.4 COMMENT:** I disagree with the Recreation section of the EIS. Hiking Goose Creek Canyon WSA is a day hike from the WSA to the Temple of Sineawava, Zion National Park, and many parties do this route each summer. There are three entries into Goose Creek. All three pass through the WSA. The technical descent starts at the head of Goose Creek and follows the drainage. There is an entry on the west and an entry on the east (both pass through the WSA). See the route description binder at the front desk of the Zion Visitor Center for a description of all three canyoneering routes. Use of Goose Creek Canyon WSA is much more than estimated in the EIS. [Bob Lineback]

**E.4 RESPONSE:** Visitor days account for hours spent in an area. Because the routes pass through the WSA, the estimate of 100 visitor days of use per year is maintained in the Final EIS.

**E.5 COMMENT:** Management of this area presents no problems. Wilderness manages itself in most situations. Management consists of not issuing permits for nonwilderness developments, not performing reclamation, and not monitoring nonwilderness developments. Wilderness management by all rationale should cost less than nonwilderness management. BLM offers no reasons, examples, case histories, or legal restraints that support their opinion of management problems. [Utah Wilderness Coalition]

**E.5 RESPONSE:** BLM has not identified this WSA as having management problems. Also, see the responses to General Comments 3.11, 8.23, and 24.2.

**E.6 COMMENT:** The mineral potential for this area is probably low. [State of Utah]

**E.6 RESPONSE:** Mineral development is not projected for the Goose Creek Canyon WSA.

**SECTION F**  
**BEARTRAP CANYON WSA**

**F.1 COMMENT:** This was one of those areas that the Secretary of the Interior requested BLM drop because they argued it was not 5,000 acres or more in size. A law suit filed by the conservationists (Sierra Club vs. Watt, No. Civil 5-83-035 LRK April 18, 1985) succeeded in reinstating this area to wilderness study. This area is part of a 5,000-acre or larger wilderness area if the adjacent National Park is

## SPECIFIC COMMENTS AND RESPONSES

### SECTION F: BEARTRAP CANYON WSA (CONTINUED)

considered. BLM has correctly recommended this area be designated wilderness. [Utah Wilderness Coalition]

**F.1 RESPONSE:** The EIS notes the legal background for including this WSA in the wilderness study.

**F.2 COMMENT:** Offering best protection to Beartrap Canyon WSA is an important step. The area qualifies, and even though small, is a logical part of the Zion National Park wilderness proposal. This parcel of BLM land is the left fork of the upper part of Bear Trap. Wilderness recommendation will also assist the process of transfer of management of this area to the NPS. [Utah Wilderness Coalition]

**F.2 RESPONSE:** See the response to Specific Comment 15.2.

**F.3 COMMENT:** The only criticism that we can offer is the failure to consider this area in all of the alternatives. BLM failed to include this area as suitable in the Large and Small Cluster Alternatives. Using the criteria, although vague, listed in Volume I, this area qualifies for recommendation. BLM also did not show this alternative as suitable with the Modified Suitability Alternative. BLM needs to explain clearly the recommendation criteria for each alternative and explain how they are applied to each area. [Utah Wilderness Coalition]

**F.3 RESPONSE:** Beartrap Canyon WSA was not included in the Statewide cluster alternatives in Volume I because it did not meet the size criteria of 100,000 acres, at least 25 percent of which are BLM WSA lands. The criteria are clearly listed in Chapter 2 of Volume I.

**F.4 COMMENT:** The western slopes of the hard scabble form the headwaters of many of the canyons that drain into the Kolob portion of Zion National Park. Many of these headwater canyons are private lands, yet remain completely natural. Before growth comes to these areas, BLM should begin to acquire through purchase or exchange these lands critical to protecting the Zion region. [Utah Wilderness Coalition]

**F.4 RESPONSE:** BLM does not propose acquisition of land as part of wilderness designation. The wilderness review process is not a land acquisition proposal, except that in-holdings may be considered later within the parameters of the Wilderness Act and the BLM Wilderness Management Policy (BLM Manual

8560). See related information on in-holdings and acquisition in Chapter 1 and Appendix 1 in Volume I.

**F.5 COMMENT:** The mineral potential for this WSA is probably low. [State of Utah]

**F.5 RESPONSE:** No mineral exploration or development is projected in this EIS for the Beartrap Canyon WSA.

**F.6 COMMENT:** The Draft EIS neglects consideration of available cultural information from archaeological surveys on Forest Service land to the north of the WSA. [State of Utah]

**F.6 RESPONSE:** See the response to Specific Comment E.3.

## SECTION 36

### MT. ELLEN - BLUE HILLS WSA

**36.1 COMMENT:** This recommendation is correctly described as a partial wilderness recommendation. In the inventory BLM reduced the size of this unit from 191,140 acres to its present size. Areas of equal wilderness values were split off and deleted. BLM's proposal boundary skirts South Caineville Mesa with no difference in naturalness between the part deleted and that remaining in the WSA. The Blue Hills also were split through completely natural areas. These deletions closely follow the lines of leases and claims held for future mineral development. A majority of the proposal boundary follows section lines deleting magnificent portions of the Blue Hills from wilderness designation. BLM needs to study a much larger and more important wilderness area. [Utah Wilderness Coalition]

**36.1 RESPONSE:** Boundaries for WSAs were based on criteria which primarily avoid roads and other obvious imprints of man. If mesas and ridge tops do not meet this criteria, they were not included in WSAs. These boundaries were determined during the inventory phase of wilderness planning. See the response to General Comment 3.1. The South Caineville Mesa has been added to the Partial Wilderness Alternative and is part of BLM's Proposed Action.

**36.2 COMMENT:** Why was the Bull Mountain WSA separated from the Mt. Ellen-Blue Hills WSA which share a common boundary? Is the presence of a jeep



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

trail really that significant? Perhaps our perspectives are biased in different directions. [T. Young]

**36.2 RESPONSE:** The two WSAs are separated by a constructed dirt and gravel road. This is a significant feature and it will remain open to vehicle traffic.

**36.3 COMMENT:** The wilderness boundaries should be extended to the wash and creek edges to improve the manageability of the area. As outlined by BLM, the boundaries as they follow the section lines will make proper wilderness management very difficult. [Sierra Club, Cache Group]

**36.3 RESPONSE:** Boundaries of WSAs were determined in the inventory phase of wilderness planning. See the response to General Comment 3.1. BLM does not agree that boundaries along section lines would automatically "make wilderness management very difficult."

**36.4 COMMENT:** The Draft EIS establishes that there are 12.8 miles of roads in the Mt. Ellen WSA, therefore violating the established criteria for wilderness values. BLM's definition of a "way" is a little unrealistic. If you can drive an outfit on it, it's a road, it's a road, it's a road, it's a road. And we feel that calling 12.8 miles of road a "way" is pro-wilderness bias in the Draft EIS, and throughout all the EIS there exists the bias of calling roads "ways" because one of the criteria for wilderness is substantial nonimpact by man. Now you can get around that by calling a substantial road a "way." Therefore, we feel that this bias should be removed in the Final EIS. [Wayne County]

**36.4 RESPONSE:** See the response to General Comments 4.1 and 4.2.

**36.5 COMMENT:** BLM has been negligent in protecting wildland. Under study a recent case on the Mount Ellen range, BLM allowed a change to occur within a wilderness study area by taking a bulldozer and deforesting the lands there. BLM then argued to change the boundary so that it deletes that area from study. We contested and that area is part of the wilderness study again. The Draft EIS is in error in describing this area. [Utah Wilderness Coalition]

**36.5 RESPONSE:** A restoration plan is being implemented in the 167-acre deforested area, and the current situation is described in the Final EIS.

**36.6 COMMENT:** Page 2, No Action Alternative, Paragraph 1: The 11 in-held sections total 7,472.32 acres. This affects the text elsewhere. [State of Utah]

**36.6 RESPONSE:** The text has been changed to read "5,294 acres" in the No Action/No Wilderness Alternative section, and also in the All Wilderness Alternative section. This change resulted from a slight correction in boundary location in T. 30 S., R. 9 E., sec. 32, and cherry-stemming out two State sections (T. 30 S., R. 8 E., sec. 36 and T. 31 S., R. 8 E., sec. 2).

**36.7 COMMENT:** Page 11, Paragraph 1, Line 10: This sentence should read ". . . involve the Federal acquisition of six sections (4518.92 acres) of State land." [State of Utah]

**36.7 RESPONSE:** Text in the Partial Wilderness Alternative section, page 11, has been changed to read "seven sections (4,148 acres).

**36.8 COMMENT:** Page 5, All Wilderness Alternative, Paragraph 2: The State has requested exchange of seven State sections (4,034 acres). [State of Utah]

**36.8 RESPONSE:** All assumptions and impacts relative to State in-holdings have been revised substantially in the Final EIS, resulting from a major change in the position of the State. See the State lands discussion in Chapter 2 of Volume I. Also, see the responses to General Comment 6.3. and Specific Comment 36.6.

**36.9 COMMENT:** BLM claims its proposal would preserve the area with outstanding opportunities for solitude and primitive recreation. BLM's claim that one side of the proposed western boundary is outstanding and the other is not is unsupported and insupportable. IBLA said it was unsupported and it never can be. The mesas contribute to the outstanding opportunities of the recommended area and vice versa. The mesas are surrounded by spectacularly rugged Mancos shale badlands and offer outstanding scenic sightseeing from their rims, challenging hiking to their summits, and opportunities for nature study on their tops. Moreover, there are no significant conflicts with designation of the western part of the WSA. [Utah Wilderness Association]

**36.9 RESPONSE:** Boundaries for WSAs were based on criteria which primarily avoid roads and other

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

obvious imprints of man. These boundaries were determined during the inventory phase of wilderness planning. See the response to General Comment 3.1. Rationale for BLM's Proposed Action is given in Appendix 11 in Volume I. BLM's Proposed Action of 58,480 acres in the Draft EIS has been expanded to 65,804 acres in the Final EIS. This results from adding South Caineville Mesa (at the northwest side of the WSA) to the Proposed Action.

**36.10 COMMENT:** Wilderness designation would produce benefits for multiple uses not fully discussed in the analysis. The claims raised by the coal industry that buffalo don't mind strip coal mining are not true. Each of the wilderness values would receive the proper priority of protection which would not occur in nonwilderness lands. This area qualifies and should be designated wilderness. [Utah Wilderness Coalition]

**36.10 RESPONSE:** Multiple use benefits from wilderness designation are discussed for the All and Partial Wilderness Alternatives. As explained on pages 27 and 30, bison numbers are expected to increase with the No Action/No Wilderness Alternative but decline slightly in the long term with the All Wilderness Alternative. The 65,804 acres proposed in the Partial Wilderness Alternative contain the most scenic, rugged, and mountainous portions having the highest quality wilderness characteristics in the WSA.

**36.11 COMMENT:** Much of the land in the Draft EIS proposal has been dropped in order to chain the benchlands for so-called wildlife improvements. Most of the increased forage is not scheduled to go for the bison, however, but to livestock. Once again the rich rancher welfare recipients are demanding that BLM destroy a marvelous wilderness, and pay for the privilege of lining their pockets. I am totally opposed to anymore livestock 'improvement' boondoggles in this area. We do need to protect this critical bison range. The entire area should be designated as wilderness. The proposal would delete all of the Blue Hills, Caineville Mesa, Wildcat Mesa and Thompson Mesa. These areas are remote, wild, unimpaired by man, and critical wildlife habitat. They are also adjacent to the proposed Capitol Reef National Park wilderness and the proposed Mt. Pennell wilderness. This area stands on its own merits but would greatly enhance the surrounding wilderness areas as well. [Scott Delong]

**36.11 RESPONSE:** While the proposed chaining will provide some benefit to livestock and other multiple uses, it is intended primarily to provide forage for bi-

son. The bench areas in the western part of the WSA were found to have less than outstanding quality of solitude and opportunities for primitive and unconfined recreation. Critical wildlife habitat by itself is not a mandatory wilderness criteria. See the response to General Comment 8.6. South Caineville Mesa has been included in the Proposed Action for wilderness designation.

**36.12 COMMENT:** Compared with other WSAs in the region, Mt. Ellen-Blue Hills WSA is considered to have moderate to high wilderness values and high conflicts. A boundary change for the recommended 58,480-acre Partial Wilderness Alternative is needed in the Dry Lakes-Nasty Flat area to minimize conflicts with range improvements. The State has independently supported designation of the Gilbert Badlands portion of the WSA as a Research Natural Area. [State of Utah]

**36.12 RESPONSE:** It would be very difficult to protect wilderness values in the vicinity of Mt. Ellen if the Dry Lakes-Nasty Flat area was excluded. Although bison forage projects would be limited by wilderness designation of the Dry Lakes-Nasty Flat area, BLM believes that the overall wilderness values are suitable for protection. Other bison projects have been proposed elsewhere. The Gilbert Badlands were designated a Research Natural Area (RNA) and an Area of Critical Environmental Concern (ACEC) in 1986.

**36.13 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the claims in the SSAs or the Draft EIS. These SSAs were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. The need for this additional information is typified by the Bull Mt. WSA. BLM's position changed from one extreme to the other, from the Draft SSA to the Draft EIS, and from a no wilderness proposal in an area with no outstanding solitude or primitive recreation values to an all wilderness proposal where both solitude and primitive recreation values are outstanding. No reason is given in the Draft EIS for the flip-flop in BLM's position. If the SSA for the Bull Mt. WSA was so poorly done, what about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

some of the SSA proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**36.13 RESPONSE:** The WSAs in Volume IV include status maps, location maps, and maps showing the wilderness alternatives analyzed. No WSA in the Draft EIS contains maps showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. Early preliminary draft material was reviewed and revised as a result of EIS scoping, new material, public and further study by BLM. The material prepared in advance of the Draft EIS was, in fact, preliminary and subject to change. Likewise, the content of the Draft EIS was subject to change in the Final EIS. This is the normal course of events in the NEPA process, where draft material is prepared, reviewed, and improved for the final document. Also see the response to General Comment 26.1.

**36.14 COMMENT:** The coal and uranium mining options are overstated and should be considered in light of the potential affect on nearby Capital Reef National Park. [Rudy Lukez]

**36.14 RESPONSE:** For the Final EIS analysis, it is assumed that no mineral extraction would occur in the WSA within the short-term future. This assumption is based on available data and projections of mineral supply, demand, and economics. See Appendix 6 in Volume I. The potential exists for mineral development (notably coal) at Wildcat Mesa in the long-term future.

**36.15 COMMENT:** In the geology text there is no discussion of sedimentary rocks other than the Mancos Shale and no discussion of the lithology of the volcanics. This is more of a geomorphological than a geological discussion. This type of geomorphological data is not very useful in helping the public determine the economic potential of a WSA. [State of Utah]

**36.15 RESPONSE:** The Geology section of the EIS is not intended to address the economic mineral potential of the WSA. A discussion of the mineral resource potential is given in the Mineral and Energy Resource section of the EIS.

**36.16 COMMENT:** Our District is planning a three phase development using the water of the Fremont

River to help our people. The project is in the \$40 to \$50 million range and will provide approximately 500 full-time equivalent jobs Statewide. Some of the WSAs are particularly objectionable to us in view of possible conflicts with our project. These are not adequately addressed in the Draft EIS. With the Mt. Ellen-Blue Hills WSA, the northwest boundary has been extended beyond that which was previously discussed as satisfactory for our project needs. Our final plans may need route access and/or materials in that area. The terrace gravel deposits are a valuable resource in our area, and the impact of the loss of them has not been addressed. Caineville has considered seeking use of a spring within the WSA as a source of culinary water for the community. Other sources closer are poor quality. [Wayne County Water Conservancy District]

**36.16 RESPONSE:** The Partial Wilderness Alternative is BLM's Proposed Action. This would leave nearly one-third of a mile of land between the river and the WSA boundary. Accessing gravel material within a designated wilderness area would not be allowed under the management guidelines; however, alternative sources should be available in the region. BLM understands that the water impoundment would not extend into the proposed wilderness area. The proposed reservoir project is included in the EIS analysis in Volume IV. Also, Volume I, Appendix 1, gives further information on water development criteria. In addition, see the responses to General Comments 14.5, 14.7, and 14.8.

**36.17 COMMENT:** Another vital concern to the maintenance of these needed water sources is flood control. In 1984 severe flooding in Bull Creek destroyed a bridge necessary to local travel and cost Wayne County over \$10,000 in road repairs. This creek already has some flood control measures in place such as rip-rap and dams, but much more is needed here and on other water ways to ensure the holders of water rights the ability to maintain their irrigation water supplies. The maintenance of existing reservoirs as well as an ongoing need for new ones is another concern. These reservoirs benefit not only livestock but wildlife as well, but they must be cleaned often and the earthen dikes repaired. The equipment necessary for this maintenance would be prohibited by the guidelines for clean air even in areas not in the WSAs. [Wayne County]

**36.17 RESPONSE:** The maintenance of existing necessary rangeland and watershed improvements would be allowed. Mechanized equipment would be permitted

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

for maintenance of existing facilities where practical alternatives are not available. Refer to Appendix 1, Part A in Volume I, for information on water resource management and maintenance of existing range improvements. Also, see the response to General Comment 14.17. Wilderness designation would have no effect on clean air standards related to use of equipment for maintenance.

**36.18 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration: (a) historic past production of gold, silver, copper, uranium, and vanadium; (b) roads and jeep trails cut into and cross the area; and (c) moderate potential for future production of gold, silver, copper, uranium, vanadium, and tungsten in intrusive and sedimentary rocks. [Utah International, Inc.]

**36.18 RESPONSE:** The Mt. Ellen-Blue Hills WSA has the potential for occurrence of small metallic mineral deposits (see Mineral and Energy Resource section of the EIS). The potential for occurrence of these mineral deposits has been considered in the formulation of the wilderness Proposed Action.

**36.19 COMMENT:** At this time there are no manageability problems. By allowing Exxon to drill within the WSA, BLM admits that wilderness can be managed with oil and gas leases. The presence of dry drill holes and a fairly detailed geologic information substantiate the conclusion that there are no significant oil or gas conflicts within this area. [Utah Wilderness Coalition]

**36.19 RESPONSE:** BLM approval of the Exxon exploration well within the WSA is an individual case, and it does not necessarily indicate that wilderness may be managed successfully with mineral development. The WSA is relatively unexplored for oil and gas resources, however, the data obtained from the Exxon well indicates only that no commercial quantities of hydrocarbons were encountered in the formations tested by that well. Based on available geologic information, the WSA has the potential for small accumulations of oil and gas in Paleozoic and Mesozoic rocks.

**36.20 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wil-

derness designation have the potential for future hydrocarbon production. The five WSA areas numbered 36, 37, 42, 43, and 44, in the northeast portion of Garfield County and the southern portion of Wayne County, are situated in the Henry Mountain Basin. Although some of these areas are partially associated with Tertiary age intrusives, they all still have potential for hydrocarbon production. These Henry Mountain Basin areas are unexplored. We have leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**36.20 RESPONSE:** See the responses to General Comments 15.1, 15.2, 15.19, and Specific Comment 36.19.

**36.21 COMMENT:** The likelihood of strip-mining coal on Wildcat Mesa is extremely speculative given the economic, environmental, and political constraints such development would face. [Utah Wilderness Association]

**36.21 RESPONSE:** See the response to Specific Comment 36.14.

**36.22 COMMENT:** Mineral and Energy Resources: Small precious metal deposits can still be of significant economic and strategic value. [State of Utah]

**36.22 RESPONSE:** The WSA is rated as having a potential for the occurrence of small deposits of gold and silver (see the Mineral and Energy Resources section of the EIS); however, BLM believes that the Proposed Action for 65,804 acres of wilderness outweighs the potential for mineral discovery and extraction.

**36.23 COMMENT:** All impacts mentioned in the No Action section are relative to bison an/or deer. This game orientation, which is inadequate and biased, is especially obvious in many of the Volume IV WSAs. [Scott Mills]

**36.23 RESPONSE:** Most impacts addressed by the various resource activities could affect wildlife values. Bison and deer are the most prominent wildlife seen and those of greatest concern to most people; however, they are not the only species recognized within the area. The text has been revised to include reference to several other wildlife species. See the responses to General Comments 16.2 and 16.4.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

**36.24 COMMENT:** Wildlife, Paragraph 2: For the general reader, the allocation of AUMs for Dry Lakes/Nasty Flat between big game and livestock is unclear. A statement that indicates season of use will determine usage may be more useful than the statement found on page 27, paragraph 2, that the "actual balance of use that would result between livestock, deer, and bison is unknown." [State of Utah]

**36.24 RESPONSE:** The vegetation manipulation of 1,000 acres in the Dry Lakes/Nasty Flat area that is planned would produce a total of 200 AUMs which would be specifically designated to wildlife. Table 7 indicates the season of use by livestock within the Mt. Ellen-Blue Hills WSA. The AUMs allocated to wildlife by individual allotment can be found within the "Final Henry Mountain Grazing EIS." The sentence quoted in the comment has been deleted and the text clarified.

**36.25 COMMENT:** Page 18, Column 2, Paragraph 2: Statement that "planned . . . vegetation manipulation . . . would produce an estimated 245 AUMs for big game," is in error. Livestock use this area (Nasty Flats, shown in Table 7). [State of Utah]

**36.25 RESPONSE:** The sentence referenced in the comment is correct. See the response to Specific Comment 36.24.

**36.26 COMMENT:** The statement that 52 bison use the WSA probably is a reasonable average figure; however, use of this "average" figure completely obscures the very high biological importance of this area to bison. Specifically, the upper slopes of Mt. Ellen that lie within the WSA provide extremely important early summer range for one-half or more of the entire bison herd. True, an average of 52 bison may use the area, but in June and July 100 or more bison will be in the WSA. You will find these details of bison distribution both in my contract report to BLM and in my thesis. The EIS should state that this WSA is heavily used by bison in early summer; wilderness designation will help protect this important part of the bison range. [Dirk Van Vuren]

**36.26 RESPONSE:** The higher elevation portion of this WSA is very important for the buffalo. The average number was utilized to show the approximate amount of forage required in this area. Since the Draft EIS was written, it has been found that more bison use is being made of the high area. BLM does recognize this in identifying several thousand acres (see

Table 6) of crucial big game range in the WSA. In the case of bison, BLM has determined that wilderness designation would not have a significant beneficial effect. Rather, it appears that wilderness would generally have an adverse affect because it would limit potential for forage management projects and possible future expansion of the bison herd.

**36.27 COMMENT:** The statement that, "Based on the assumption that bison are evenly distributed . . ." is patently false. Bison distribution is extremely unpredictable and often very nonuniform. The assumption that bison in the Henry Mountains are uniformly distributed is so baseless that I urge, in the strongest terms, that this assumption and all discussion derived from it be deleted from the EIS. Bison distribution is addressed in a contract report to BLM. Instead of making sweeping assumptions, rather state (1) bison movements are very unpredictable and often result in a clumped distribution, (2) we cannot assess with any certainty the importance of any particular area to bison, and (3) we must accept that loss of bison habitat in a seemingly small area could have major affects on herd distribution. Remember, a corralling operation to curb brucellosis, which was held for just a couple of days at one site (Granite Wash), resulted in the entire herd abandoning its entire winter range. [Dirk Van Vuren]

**36.27 RESPONSE:** Bison movements are unpredictable. However, the assumption in question was intended to express the low significance in carrying capacity of one buffalo as related to 200 acres of surface disturbance. The EIS indicates that the Henry Mountain bison herd is free-roaming and that during the year there may be a clumping of 100 or more bison in a particular area.

**36.28 COMMENT:** This roadless area is important for joining: (1) the Fremont River and (2) the South Caineville Mesa. BLM's final proposal should include: (1) the Caineville Mesa, (2) the Thompson Mesa, and (3) the Wildcat Mesa. Many of the dropped areas include critical winter bison range lands. These lands must be protected if the bison herd is to maintain itself. [Sierra Club, Cache Group]

**36.28 RESPONSE:** The critical bison range lands will be managed to protect and maintain the herd at a designated level, with or without wilderness designation. With wilderness designation, it would not be possible to increase bison numbers.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

**36.29 COMMENT:** The EIS infers that 40 percent slope was used as criteria for classifying forest lands as unsuitable. Slope is not an appropriate classification standard. Suitability is based upon biological factors and, therefore, these lands should not have been classified as not available for forest management. [Agency comment]

**36.29 RESPONSE:** See the response to General Comment 17.4.

**36.30 COMMENT:** None of the acreage remanded by the IBLA was added to BLM wilderness proposal. Speculative mineral values and an insignificant chaining proposal are used to eliminate a large part of the WSA from the Proposed Action. The Draft EIS does not give an adequate analysis of the recreation values on the remanded acreage. The outstanding quality of the visual resource is recognized by the scenic quality ratings; however, the VRM classifications need to be redone; 19 percent of the WSA has a Class IV VRM rating. Since all of the WSA has either Class A or Class B scenic quality, Class III is the lowest VRM rating possible using the latest Visual Resource Inventory manual. The EIS doesn't have any maps showing the areas that are supposed to lack outstanding opportunities for solitude and primitive recreation, so no rebuttal is possible (a very effective ploy by BLM). However, I dispute the statement that 25 percent of an area 19 miles by 16 miles lacks outstanding opportunities for solitude. All of this WSA deserves wilderness designation. [Owen Severance]

**36.30 RESPONSE:** The visual resource inventory classes are assigned based on combinations of scenic quality, sensitivity levels, and distance zones. BLM Manual Handbook 8410-1 (Visual Resource Inventory) shows in illustration 11 that it is possible to have a visual resource inventory Class IV area which contains Class B scenic quality. See the responses to General Comments 19.1, 19.4, and 26.1.

**36.31 COMMENT:** We will be stricken by the loss of multiple use status as well as the social impact of the loss of the use of such areas as Lonesome Beaver Campground. Lonesome Beaver has been the site of the annual town celebration of the 24th of July, Utah's Pioneer Day for over 100 years. Both the church and the local Boy Scout troop use these areas for recreational, learning, and spiritual experiences. The designation as wilderness and the resultant prohibition of the use of motorized vehicles will end all of

the above historic rights and uses of these areas by the local residents. [Wayne County]

**36.31 RESPONSE:** The Lonesome Beaver Campground was inadvertently included within the Mt. Ellen-Blue Hills WSA on BLM's 1980 Wilderness Inventory Decision Maps. The revised Partial Wilderness Alternative for the WSA, which is BLM's Proposed Action, would exclude the Lonesome Beaver Campground. The partial wilderness boundary is adjacent to the west side of the campground area. Existing roads in the Henry Mountains are not within WSAs and would not be closed as a result of wilderness designation. None of the existing activities mentioned in the comment would be adversely affected.

**36.32 COMMENT:** This area contains both some of the highest and finest of BLM mountains and the starkest bad lands. Between these two extremes is almost every value found in the public lands. Buffalo, the only wild herd in this region, roam and depend on this area. The views both of and from Capitol Reef National Park expose more history of the earth than can be written in these comments. [Utah Wilderness Coalition]

**36.32 RESPONSE:** The items mentioned above are all wilderness supplemental values and, should the area be designated wilderness, would add to the wilderness experience. However, with or without wilderness designation, most of these values in themselves would be unaffected.

**36.33 COMMENT:** As nearly as I can determine from public input, in excess of 99 percent of the full-time residents of Garfield County are adamantly opposed to the designation of any wilderness within our county for any reason. The below listed units can not be supported by me as a Garfield County Commissioner for wilderness designation because of the opportunity for primitive and unconfined recreation are less than outstanding due to a lack of diversity of recreational opportunity. These areas are simply geological formations which are common to the region. They are limited by either a lack of curiosity-arousing features or other unique or unusual features which would attract visitors, and their designation as wilderness would seriously limit future development of our county's mineral and geological resources. [Guy Thompson]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

**36.33 RESPONSE:** The views expressed are noted. See the responses to General Comments 1.1 and 2.21, and Specific Comment 30.40.

**36.34 COMMENT:** Unknown is the complete inventory of wilderness values in this area. Should BLM complete the inventories of archaeological sites, rare and endangered species, wildlife, recreation, plant life, and other special features, the knowledge of the enormous diversity of this area would be expanded. This would even further justify wilderness designation. [Utah Wilderness Coalition]

**36.34 RESPONSE:** Areas suitable for designation must possess mandatory wilderness characteristics. The items mentioned above are supplemental values and in themselves do not mandate wilderness designation. See the responses to General Comments 9.6, 13.1, 16.3, 20.2, and 22.4.

**36.35 COMMENT:** BLM's reference to "numerous locations" that are "sparsely vegetated, open, and relatively flat" in the analysis is a misleading description of the western part of the WSA. These areas are on top of the mesas that by their nature offer outstanding opportunities and add to the diversity of the area. BLM should add these small, flat areas without conflicts on top of the mesas to the suitable recommendation. They are an integral part of the superb Mt. Ellen-Blue Hills WSA. [Utah Wilderness Association]

**36.35 RESPONSE:** The majority of the western area of the WSA is as described in the EIS. Also, the EIS notes the mesas, which are a minor part of the area based on acreage of the entire western side of the WSA. South Caineville Mesa has been added to the Proposed Action alternative in the Final EIS.

**36.36 COMMENT:** Climbing to the peak of Mt. Ellen and Mt. Pennell, I was pleasantly surprised to find the spectacular views of Lake Powell, Oyster Shell Reef, and the surrounding desert. I believe that their recreational value is high and should be spared. Also, because of their unusual geology, the Henry Mountains may be used as a "classroom" for geological studies. The Henry Mountains can be a learning experience. [Allent Lea]

**36.36 RESPONSE:** Fifteen primitive-type recreational opportunities were evaluated in these two WSAs. General sightseeing was rated high. Whether or not these two WSAs are designated wilderness,

those scenic values, as well as a "classroom" for geologic studies, will remain.

**36.37 COMMENT:** The Utah Wilderness Coalition supports the designation of the Gilbert Badlands which lie in the middle of the northeastern part of the WSA. BLM should designate these ACECs as well as designate the area wilderness. The importance to science and to protection of the area is critical. This designation would complement and reinforce the importance of the area. Originally, BLM wanted to designate most of the northern part of the WSA, 48,000 acres, as an ACEC. BLM should consider designation of all of the original area. The reasons are the same as listed in the justification for the Gilbert Badlands proposal. First, it meets identified needs in Utah's growing system of natural areas. Second, the area is now being used for scientific research and has potential to support more. Finally, designation can be accomplished with few resource conflicts. BLM should designate all of the area an ACEC and recommend wilderness protection as well. [Utah Wilderness Coalition]

**36.37 RESPONSE:** The RNA/ACEC designation is designed to protect specific special values, in this case scientific and educational features. It is not the intent of this designation to provide protection of wilderness values, although an ACEC may be within a WSA or wilderness area. Conversely, wilderness designation may not necessarily recognize all scientific and educational features. The Gilbert Badlands RNA/ACEC Management Plan, covering 3,680 acres, stipulates protection criteria in addition to those that would result from wilderness provisions. Also, see the response to Specific Comment 36.12.

**36.38 COMMENT:** Mt. Ellen received a fair though not entirely favorable wilderness recommendation in the Draft EIS while Mt. Pennell was refuted as a wilderness candidate. I argue that these mountainous scapes on the west flank of the Henrys are important to the ecological and habitat communities of the whole and do not portray adequate natural circumstances when split up or left for coal development entirely. Mention in the Mt. Pennell analysis is made of habitat "improvements" necessary for the free-roaming bison herd. If this group of animals is so notably wild and free, why must we manage the habitat for them? [Bruce Chesler]

The best we could do for these and other native plants, animals, and soils in the Henrys would be to classify these WSAs as wilderness, and lay off the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 36: MT. ELLEN-BLUE HILLS WSA (CONTINUED)**

improvements and coal mines. My suggestion for the west side mesas (Swap, Thompson, Wildcat, Tarantula, South Caineville) would likewise be to let them remain wild for the cactus, mule deer, and raptors. The riparian stretch along the Fremont River below the South Caineville Mesa, and that stretch of ephemeral streams providing headwaters for Bullfrog Creek, should likewise be preserved for its life-giving water and plants. In as dry a region as this, certainly water is a critical feature on the landscape for both human visitor and animal resident. I would say the Henry Mountains and surrounding pediments, mesas, and badlands represent a significant national resource, from scenic, recreational, and scientific standpoints. The final recommendations should increase the acreages of wilderness on these two areas.

**36.38 RESPONSE:** The Proposed Action in the Final EIS includes an increase of 7,324 acres at South Caineville Mesa in the Mt. Ellen-Blue Hills WSA and an increase of 25,800 acres in the Mt. Pennell WSA.

**SECTION 37**  
**BULL MOUNTAIN WSA**

**37.1 COMMENT:** BLM excluded large parts of the slopes on the eastern side of the mountain from the wilderness study area. This leads to the illogical straight line following section lines. These areas are natural and should be included in the recommendation. [Utah Wilderness Coalition]

**37.1 RESPONSE:** These areas were determined by the inventory to lack wilderness character and were dropped. The final inventory decisions resulted from public input and were subject to appeal. See the response to General Comment 3.1.

**37.2 COMMENT:** In the initial inventory, this unit was reduced from 32,900 acres to 23,730 acres. In this case acreage with significant impacts, recent forest removal by chaining with bulldozers, was removed. The next deletion in the intensive inventory removed additional impacts but also removed large natural areas which should have been studied. The intensive inventory reduced the unit to its present size, 11,800 acres. The history of deletions, some of which violate the inventory policy, need to be considered when BLM uses the smallness of size as a reason for not recommending wilderness designation. BLM

violated the inventory policy in deleting natural areas from wilderness study. BLM failed to choose a boundary that is at the edge of human impacts as required in the inventory policy. BLM is required to correct these problems. [Utah Wilderness Coalition]

**37.2 RESPONSE:** See the responses to General Comments 2.4 and 3.1.

**37.3 COMMENT:** We support wilderness designation with the addition of the important slope and bench areas in the eastern part of the unit. BLM should review its decision concerning these additional lands adjacent to the WSA. [Utah Wilderness Coalition]

**37.3 RESPONSE:** See the responses to Specific Comments 37.1 and 37.2.

**37.4 COMMENT:** Why was the Bull Mountain WSA separated from the Mt. Ellen-Blue Hill WSA which share a common boundary? Is the presence of a jeep trail really that significant? Perhaps our perspectives are biased in different directions. [T. Young]

**37.4 RESPONSE:** Refer to the response to Specific Comment 36.2

**37.5 COMMENT:** We commend BLM for including the complete WSA into its wilderness proposal. For complete wilderness protection of an important and very natural biological community, BLM should consider the slightly larger 17,870-acre Utah Wilderness Coalition proposal. This WSA has important big game wildlife habitat which will be preserved through wilderness designation. There are no identifiable conflicts with any development plans in either the Draft EIS or UWC proposal. [Sierra Club, Cache Group]

**37.5 RESPONSE:** See the response to Specific Comment 37.1. The Bull Mountain WSA is included in the BLM Proposed Action, based on other than wildlife reasons. As a general rule, wilderness designation is not necessarily the best way to preserve big game wildlife habitat. For example, under certain conditions, forage projects may be needed to maximize bison, deer, and elk populations. Such projects may be constrained by wilderness designation.

**37.6 COMMENT:** Bull Mountain is ranked as having low wilderness quality and low conflicts in relation to other WSAs in the region. BLM's proposed 11,800-acre All Wilderness Alternative would not result in major conflicts except to wildlife. About 330 acres-



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 37: BULL MOUNTAIN WSA (CONTINUED)

of vegetation manipulations for bison and mule deer would not be allowed under the Proposed Action. [State of Utah]

**37.6 RESPONSE:** Table 4 lists this area as high wilderness quality. Most of the WSA is in a completely natural condition and has outstanding solitude and primitive recreation. The 330 acres (600 acres in the Final EIS) indicated as having potential for revegetation would have a low priority compared to other areas in the Henry Mountains. The impacts to deer and bison from wilderness designation are reflected in the EIS analysis.

**37.7 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the claims in the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims etc. BLM's position changed from one extreme to the other, from the Draft WSA to the Draft EIS, and from a no wilderness proposal in an area with no outstanding solitude or primitive recreation values to an all wilderness proposal where both solitude and primitive recreation values are outstanding. No reason is given in the Draft EIS for the flip-flop in BLM's position. If the WSA for the Bull Mountain WSA was so poorly done, what about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the WSA proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be re-evaluated by "unbiased" BLM personnel. [Owen Severance]

**37.7 RESPONSE:** See the response to Specific Comment 36.13.

**37.8 COMMENT:** This recommendation is a complete reversal of the position stated in the WSA. No explanation is given for the change--could BLM have made a wrong decision in the WSA? Once again the VRM classification needs to be corrected. The area with Class B scenic quality is given a Class IV VRM rating instead of at least a Class III rating. Although this WSA has had a difficult time becoming a wilderness proposal, BLM is finally recommending the All Wilderness Alternative, a proposal that I agree with. [Owen Severance]

**37.8 RESPONSE:** See the responses to Specific Comments 36.13 and 36.30.

**37.9 COMMENT:** No mention is made of the presence of bristle cone pine. [Kim Jennyson]

**37.9 RESPONSE:** Bristle cone pine is known to exist in the Bull Mountain WSA. It is included with mixed conifers in the Forest Resources portion of the Affected Environment narrative, and specifically noted in the portion on wilderness special features.

**37.10 COMMENT:** Another vital concern to the maintenance of these needed water sources is flood control. In 1984 severe flooding in Bull Creek destroyed a bridge necessary to local travel and cost Wayne County over \$10,000 in road repairs. This creek already has some flood control measures in place such as rip-rap and dams, but much more is needed here and on other water ways to ensure the holders of water rights the ability to maintain their irrigation water supplies. The maintenance of existing reservoirs, as well as an ongoing need for new ones, is another concern. These reservoirs benefit not only livestock but wildlife as well, but they must be cleaned often and the earthen dikes repaired. The equipment necessary for this maintenance would be prohibited by the guidelines for clean air even in areas not in the WSAs. [Wayne County]

**37.10 RESPONSE:** See the response to Specific Comment 36.17.

**37.11 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration. Historic past production of gold, silver, copper, uranium, and vanadium. [Utah International, Inc.]

**37.11 RESPONSE:** BLM information concerning the potential for locatable mineral occurrence has been included in the Mineral and Energy Resources Section of the EIS. This information has been used in formulating BLM's Proposed Action. At Bull Mountain, the wilderness values are judged to outweigh the potential for mineral discovery and extraction.

**37.12 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 37: BULL MOUNTAIN WSA (CONTINUED)

hydrocarbon production. The five WSA areas numbered 36, 37, 42, 43, and 44, in the northeast portion of Garfield County and the southern portion of Wayne County, are situated in the Henry Mountain Basin. Although some of these areas are partially associated with Tertiary age intrusives, they all still have potential for hydrocarbon production. These Henry Mountain Basin areas are unexplored. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**37.12 RESPONSE:** See the responses to General Comments 15.1, 15.2, 15.19, and Specific Comment 37.11.

**37.13 COMMENT:** All impacts mentioned in the No Action section are relative to bison and/or deer. This game orientation, which is inadequate and biased, is especially obvious in many of the Volume IV WSAs. [Scott Mills]

**37.13 RESPONSE:** The text has been revised to include reference to several other wildlife species. See the response to Specific Comment 36.23.

**37.14 COMMENT:** No mention is made of lizards, snakes, birds, and nongame large mammals. [Kim Jennyson]

**37.14 RESPONSE:** Only the more significant or distinctive wildlife species are specifically noted in the EIS analysis. Except for species of concern (such as big game, small game, or threatened and endangered species) most common wildlife species are not factors which influence the alternatives or the determination of the Proposed Action. The EIS is not intended to be an encyclopedic document. The major species are identified in the Wildlife section of the description of the Affected Environment and the Environmental Consequences. Corresponding Wildlife sections of Volume I also address both game and nongame species.

**37.15 COMMENT:** The agency correctly finds that additional chaining proposed for local cattle operators is unjustified. The Draft EIS does not fully describe this range project or the source raising the issue. We would like to know this. In the cumulative impacts to wilderness designation, is this one of the projects that gets added to the total in Volume I? Was it added to the grazing project total or wildlife project total? BLM correctly concluded that since it had not been

considered in the updated land use plan, that this was not a conflict deserving attention. If that is the case, then this project should also not be shown as an opportunity foregone because of wilderness designation. The chainings done in the Henry Mountains have been called wildlife projects but were predominately for cattle. BLM needs to describe the range projects in this area and which are for wildlife and which are for cattle. Chaining broad open areas, as is the usual case, clearly does not benefit game as much as cattle. [Utah Wilderness Coalition]

**37.15 RESPONSE:** The revegetative project mentioned in the Draft EIS was an issue identified in the public scoping meetings and also in the Allotment Management Plan (AMP) written in 1961. An area of approximately 600 acres has potential for revegetation. Revegetative projects in the Henry Mountain Planning Unit have been completed with joint wildlife and livestock purposes. The Henry Mountain bison herd requires approximately 2,330 AUMs annually. All range improvement projects in the Henry Mountain Planning Unit are designed to benefit both wildlife and livestock, but this 600-acre development would be implemented to provide additional forage for bison and some added browse species for deer.

**37.16 COMMENT:** There are excellent views of the desert canyon country and other peaks in the Henry Mountains from Bull Mountain. The Henry Mountains have unique geological values; the side of Bull Mountain exhibits excellent examples of earlier sedimentary rocks tilted on end as the mountain range was formed. [Utah Wilderness Coalition]

**37.16 RESPONSE:** These values are discussed in the EIS under the headings of Visual Resources, Recreation, and Geology.

**37.17 COMMENT:** BLM has changed their opinion on this area for the better. It is now proposed as suitable. BLM recommended nonwilderness because there was one other area in that region they wanted to recommend for designation. One importance not considered in the Draft EIS is the relationship of the adjacent Mt. Ellen WSA which is also proposed as suitable. The two areas both benefit since they share wildlife and recreation values. The Bull Mountain area meets the mandatory wilderness characteristics criteria. In the absence of manageability problems or conflicts with nonwilderness resources, this area qualifies for designation under the study policy. The use of rating systems for wilderness values as the sole reason for

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 37: BULL MOUNTAIN WSA (CONTINUED)**

dropping areas directly contradicts the Wilderness Study Policy. [Utah Wilderness Coalition]

**37.17 RESPONSE:** The Proposed Action in the Final EIS is the 11,800-acre Partial Wilderness Alternative which corresponds to the All Wilderness Alternative presented in the Draft EIS. Also, see the response to General Comment 8.11.

**37.18 COMMENT:** BLM underestimates the wilderness activities. In the intensive inventory, BLM found opportunities for wilderness activities outstanding. Hunting is very popular and considered outstanding in this area. Cross-country skiing also is exceptional. BLM gives no methodology for this rating of these activities. Mt. Ellen, adjacent to this WSA, has many of the same activities which are admitted by BLM to be of high quality. Inconsistency in assessing the opportunities for wilderness activities is demonstrated by BLM. [Utah Wilderness Coalition]

**37.18 RESPONSE:** The EIS states that the Bull Mountain WSA contains wilderness qualities. Opportunities for wilderness activities are not underestimated. Fifteen primitive-type recreational activities were evaluated and many were found outstanding. The recreation narrative in the EIS is a summary of selected activities most popular for this area.

**37.19 COMMENT:** As nearly as I can determine from public input, in excess of 99 percent of the full-time residents of Garfield County are adamantly opposed to the designation of any wilderness within our county for any reason. The below listed units cannot be supported by me as a Garfield County Commissioner for wilderness designation because the opportunity for primitive and unconfined recreation is less than outstanding due to a lack of diversity of recreational opportunity. These areas are simply geological formations which are common to the region. They are limited by either a lack of curiosity-arousing features or other unique or unusual features which would attract visitors, and their designation as wilderness would seriously limit future development of our county's mineral and geological resources. [Guy Thompson]

**37.19 RESPONSE:** See the responses to General Comments 1.1 and 2.21 and Specific Comment 30.40.

**37.20 COMMENT:** There is only a superficial description of the mode of emplacement of the intrusive

rocks. Information necessary for even basic economic geological determinations include what types of rocks were emplaced, what are the contacts with the country rocks like, and what alterations exist. Details of this nature are vital to assess economic potential. [State of Utah]

**37.20 RESPONSE:** See the response to Specific Comment 36.15.

**37.21 COMMENT:** Small precious metal deposits can still be of significant economic and strategic value. [State of Utah]

**37.21 RESPONSE:** The mineral potential of the WSA is presented in the Final EIS and strategic and critical materials are noted.

**SECTION 38**  
**DIRTY DEVIL WSA**

**38.1 COMMENT:** The original inventory contained some 350,000 acres. This was whittled down to some 90,000 acres, and then the size of this proposal was cut by BLM to 61,000 acres by the exclusion of Sam's Mesa. The road which BLM uses as part of the southern boundary of the WSA is in very poor condition, apparently not maintained. A recent trip to the area showed this road to be insignificant or unnoticeable in many places and undrivable by pickup truck after a short distance into the WSA from the east. From observations made throughout the WSA, it appears that this road could revegetate and return to a substantially natural state. It is not presently significant enough to be used as a wilderness area boundary. Sam's Mesa is wilderness. A large, broadly rolling mesa with buttes, knolls, sparse vegetation, and wide vistas, this area meets the law's wilderness criteria and should not have been dropped from the wilderness recommendation. The western portion of the Big Ridge should also not have been dropped from the wilderness recommendation. This area meets the minimum wilderness criteria. It provides naturalness and outstanding opportunities for solitude and for such wilderness activities as hiking, photography, camping, and wildlife study. This area is completely natural from Two Pipe Springs to the west. Old landing strip tracks are no longer maintained and are almost completely revegetated. From the landing strip west there are no significant human impacts. North of the

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 38: DIRTY DEVIL WSA (CONTINUED)

Big Ridge, (in T. 30 S., R. 15 E., sec. 32) there are some human intrusions. A little-used road from the South Fork of Happy Canyon reaches this State section. In most of the canyon this road does not impair the naturalness of the area. From the Pinnacle in Happy Canyon to the junction of Poison Spring Canyon and the Dirty Devil River, the man-made intrusions do not significantly impair the area. The only vehicle tracks are faint ones from infrequent recreation vehicles. [Utah Wilderness Coalition]

In summary, the entire WSA should be recommended for wilderness designation, with the addition of the western part of the Big Ridge, lower Happy Canyon from the Pinnacle to the Dirty Devil Canyon to the WSA boundary.

**38.1 RESPONSE:** The Proposed Action in the Draft EIS is the All Wilderness Alternative. The areas discussed in the comment were dropped in the inventory because they lacked wilderness character, and they are no longer part of the study process. Public input was obtained and considered during the inventory. See the response to General Comment 3.1.

**38.2 COMMENT:** Another item of serious concern is with the location of WSA boundaries. Why was the Fiddler Butte WSA not connected to the Dirty Devil WSA? What's wrong with the Dirty Devil River and its canyon complex watershed being contiguously defined? Why was the Big Ridge omitted? [T. Young]

**38.2 RESPONSE:** See the response to Specific Comment 38.1.

**38.3 COMMENT:** It appears that a logical and manageable BLM wilderness should extend northward from the Glen Canyon NRA boundary (in Range 14 East) to include all of the WSAs originally described as Dirty Devil, Fiddler Butte, and French Spring-Happy Canyon plus the undescribed, unincluded, but highly deserving territories in between (in Ranges 13, 14, and 15 of Townships 30 and 31 South), such as North and South Hatch Canyons, the Pinnacle, and The Big Ridge. And don't argue that there are too many unrestorable developed intrusions. I've been there and will not accept that argument AT ALL! The landing strip intrusion arguments are totally invalid. The South Fork of Happy Canyon "road" is no longer a road and should not be used as a boundary. The North Hatch Canyon "jeep trail" is just that--a trail, not a road, therefore not a boundary. Neither the jeep trail

across The Big Ridge nor the landing strip there constitutes unrestorable intrusions. [T. Young]

**38.3 RESPONSE:** See the response to Specific Comment 38.1.

**38.4 COMMENT:** BLM should consider increasing its proposal to include the river canyon country from Sam's Mesa to Poison Spring. This entire stretch is a good candidate for wild and scenic river status. The Draft EIS eliminates almost 20 miles of unique river country which may qualify for National Wild and Scenic River status. [Sierra Club, Cache Group]

**38.4 RESPONSE:** See the response to General Comment 3.1. The Dirty Devil River from Lake Powell to Highway U-24 is listed on the Nationwide Rivers Inventory and is eligible for study as a possible addition to the National Wild and Scenic Rivers System (USDI, NPS, 1982). This status as an "inventory" river remains in effect regardless of BLM's wilderness study, and in the future, the river could be added to the wild and scenic river system by Congress with or without a designated wilderness area.

**38.5 COMMENT:** Besides the scenery, the area also has historical associations and sites plus prehistoric sites and dwellings. The lack of resource conflicts plus all these important wilderness values makes the area one of the top-ranking areas in the whole survey. My only suggestion would be to put State section 36 along the south fork of Robber's Roost Canyon into the wilderness boundary, drawing the line along the canyon rim. As I have mentioned before, this will have no legal effect until the State section passes into Federal ownership, at which point you will have a wilderness boundary that makes sense. [Robert Hassell]

**38.5 RESPONSE:** The inventory policy required the exclusion of State sections, where feasible, to minimize potential in-holdings in wilderness areas. Based on current State policy, it is assumed that the State section would not be exchanged for wilderness purposes. See Chapter 2 in Volume I for information on State lands.

**38.6 COMMENT:** In considering BLM's Proposed Action, their own inconsistency must be weighed. While keeping the French Spring-Happy Canyon WSA pared down in favor of tar sand, BLM nonetheless supports the All Wilderness Alternative for the Dirty Devil WSA. The Dirty Devil River, it should be noted, would be the source via pumps and pipes for the enormous

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 38: DIRTY DEVIL WSA (CONTINUED)

volumes of water needed for the steam injection and refining steps of tar sand. [Davis Lawrence]

**38.6 RESPONSE:** Because of the high potential for conflict with possible tar sand extraction in the long-term future, most of the French Spring-Happy Canyon WSA is not recommended as wilderness by BLM. However, there is little or no recoverable tar sand deposit in the Dirty Devil WSA. If future water supply facilities are needed, as explained in the comment, they would have to meet wilderness management standards should the Dirty Devil WSA become wilderness. It would seem feasible that alternative arrangements could be made for tar sand development ancillary facilities including water supplies.

**38.7 COMMENT:** This WSA should be combined with the French Spring-Happy Canyon WSA for better management and increased wilderness protection of the area's outstanding recreational and scenic values. The scenic Big Ridge also should be included into the BLM proposal. [Utah Wilderness Coalition]

**38.7 RESPONSE:** See the response to Specific Comment 38.1.

**38.8 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the claims in narrative of the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the early proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be re-evaluated by "unbiased" BLM personnel. [Owen Severance]

**38.8 RESPONSE:** See the response to Specific Comment 36.13

**38.9 COMMENT:** It is unacceptable that air quality and visibility would be degraded for 130 to 160 years in this WSA, or near Canyonlands National Park, or Glen Canyon NRA. Tar sand development should not be allowed in Fiddler Butte WSA, nor in French Spring-Happy Canyon or Dirty Devil WSAs, or any area in or adjacent to Glen Canyon NRA or Canyonlands National Park. [Tim Graham]

**38.9 RESPONSE:** As discussed in the Mineral and Energy Resource section of this Draft EIS, the potential combined hydrocarbon leases in the Tar Sand Triangle Special Tar Sand Area (STSA) likely would expire and would not be renewed if the WSAs were designated as wilderness. If the WSAs mentioned are not designated wilderness, the possibility exists that the Tar Sand Triangle STSA could be developed at some time in the future. At that time in the future, decisions would have to be made as to whether development could proceed or not, based on the technology then available, energy needs, and alternatives. Tar sand development is not expected in the Dirty Devil WSA.

**38.10 COMMENT:** Name the types of plants in each vegetation type. [Kim Jennyson]

**38.10 RESPONSE:** It is not necessary for the EIS to describe all of the plants in each vegetation type. The EIS focuses on information and analysis pertinent to the issues or the significant impacts. Only the more significant or distinctive plant species are specifically noted in the EIS analysis. Except for species of special concern, such as threatened or endangered plants, most individual species are not factors which influence the alternatives or the determination of the Proposed Action. The EIS is not intended to be an encyclopedic document. General information on vegetation types usually is sufficient for the purposes of the EIS. Also, see the response to General Comment 13.8.

**38.11 COMMENT:** The Draft EIS does raise a concern in the Vegetation section. In discussing the Dirty Devil's hanging gardens it states, "this vegetation type is becoming nearly nonexistent at the base of the Henry Mountains." Why is it becoming nonexistent and what management actions are being taken to reverse the trend? Again this emphasizes the importance of protecting the Dirty Devil. [Utah Wilderness Association]

**38.11 RESPONSE:** A large portion of "hanging garden" habitat was lost when the Glen Canyon Dam created Lake Powell. As stated in the Draft EIS, hanging gardens occur only on cliff ledges and in alcoves. The areas at the base of the Henry Mountains offer very little of this habitat except in the canyon areas. There is no evidence that these areas are becoming nearly nonexistent. This sentence in question has been deleted from the EIS.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 38: DIRTY DEVIL WSA (CONTINUED)

**38.12 COMMENT:** The Draft EIS is remiss in that it does not take into consideration the water salinity problem on the San Rafael, Muddy, and Price Rivers and it does not indicate how this problem will be dealt with if wilderness is designated on these streams. Because these bodies of water and tributaries are major contributors to the Colorado River salinity problem and because the Bureau of Reclamation has been given the charge of solving the salinity problem and because the Sierra Club vs. Block decision regarding a Federal reserve water right may have a major impact on what can be done, there should be no wilderness recommendation made nor should there be any wilderness designated until these issues are addressed and resolved favorably to Emery County. [Emery County]

**38.12 RESPONSE:** See the response to General Comment 14.14 and Colorado River Salinity in Volume I. Should these WSAs become wilderness, they would be managed in a natural condition. Designation would not cause a salinity problem. Proposals and alternatives to reduce salinity levels to major streams are noted for the No Action/No Wilderness Alternative where information on any such proposals is available. In the absence of known proposals, the assumption is made that treatment facilities likely would be located outside WSA boundaries. If an area is designated wilderness, it is expected that facilities would not be allowed to be constructed within that area.

**38.13 COMMENT:** Our District is planning a three phase development using the water of the Fremont River. The project is in the \$40 to \$50 million range and will provide approximately 500 full-time equivalent jobs Statewide. Some of the WSAs are particularly objectionable to us in view of possible conflicts with our project. These are not adequately addressed in the Draft EIS. The Dirty Devil River runs through the Dirty Devil WSA. The Fremont River is the main tributary to the Dirty Devil River and our main water source for future growth.

Much of our proposed lands lie on the benches west of the Dirty Devil WSA and project development will likely alter side drainages into the WSA. A major aquifer of our area discharges in the Dirty Devil WSA. A proposed water quality improvement project at Salt Wash is upstream of these WSAs. [Wayne County, Water Conservancy District]

**38.13 RESPONSE:** The EIS information and analysis for the Dirty Devil WSA has been updated to reflect available information on potential water projects. In

particular, see the Water Resources sections for the No Action/No Wilderness Alternative. Also, see the information on water resources and Federal reserve water rights in Volume I and the response to General Comments 14.1 through 14.9.

**38.14 COMMENT:** The question of the validity of the mining claims mentioned in the narrative has no place in a wilderness EIS. This issue is better addressed in an activity plan. [Mineral interests]

**38.14 RESPONSE:** Favorability and certainty ratings for mineral resource potentials have no bearing on the validity of mining claims. The text of the EIS has been changed to clarify the mining claim situation.

**38.15 COMMENT:** The OIR (2+) is not accurate primarily because the rating has been driven up by the f4 for tar sand. Aside from the fact tar sand will probably never be developed in the area, the Draft EIS indicates that only 20 acres of the WSA overlaps with the Tar Sand Triangle STSA and contains an estimated 165,000 barrels of oil in place. The tar sand favorability rating for the Dirty Devil WSA should be (f2) -- "less than 10 million barrels." This correction should place the OIR in the 2- or 1+ range which is a more accurate depiction of the mineral status of the WSA. [Utah Wilderness Association]

**38.15 RESPONSE:** Based on a recent investigation of the tar sand resource within the Tar Sand Triangle, estimates of in-place hydrocarbon reserves have been lowered. Based on this new information, the Dirty Devil WSA is thought to have no potential for tar sand resource occurrence and the favorability rating has been changed to (f1). The WSA still may have the potential for small to moderate sized deposits of uranium, copper, oil, and gas. The OIR as estimated by SAI has not been used in the Final EIS. See the response to General Comment 15.7.

**38.16 COMMENT:** The f4/c4 rating given the tar sand is probably too high. There are no known significant tar sand occurrences in the WSA and drilling in the area has also failed to disclose a significant resource. The White Rim Sandstone is sporadically petroliferous over large areas of the Colorado Plateau with the bitumen content varying dramatically over short distances; therefore, inferring an extension of the Tar Sand Triangle deposit under the WSA is conjectural. [State of Utah]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 38: DIRTY DEVIL WSA (CONTINUED)**

**38.16 RESPONSE:** Based on a Utah Geological and Mineral Survey draft report (Bishop, 1985), the Dirty Devil WSA is not underlain by oil-impregnated rock within the White Rim Sandstone Member of the Cutler Formation. Therefore, there are no hydrocarbon reserves from the tar sand resource within the Dirty Devil WSA. Based on this new information, the f4/c4 rating for tar sand has been changed to f1/c4.

**38.17 COMMENT:** The Tar Sand Triangle should not be developed. [Marlena DeLong, Scott DeLong, and Barry Lonik]

a. I adamantly oppose BLM's plan to allow tar sand development along the top of the Orange Cliffs. This incredibly inefficient method of oil extraction would destroy the wilderness character not only of the Dirty Devil Canyon system, but of adjacent Glen Canyon NRA and Canyonlands National Park lands as well. I specifically endorse wilderness designation for the Dirty Devil Canyon system.

b. This area is part of the Tar Sand Triangle and that is the primary reason why your agency has dropped so many acres from wilderness study.

I am opposed to development of tar sand in this area because it would be detrimental to the environment of the surrounding areas (Glen Canyon NRA and Canyonlands National Park) and would be an economic disaster. Tar sand is not an economically feasible alternative source of energy. Development of these "resources" would be an unjustifiable drain on the U.S. Treasury at a time when this country cannot afford to pay for it. The environmental damage to this beautiful wilderness area and adjacent Park Service lands would be unjustifiable at any time.

c. The Draft EIS proposal for this area, however, would leave out 20 miles of the river itself! It would also delete well over 100,000 acres of adjacent spectacularly wild lands that meet all of the qualifications for wilderness designation. These areas are being deleted in order to proceed with another Federally subsidized boondoggle--tar sand development. The Tar Sand Triangle sits directly in the middle of this extraordinary wilderness. I am thoroughly, completely, and adamantly opposed to the commercial development of tar sand in this area. First of all, the development of this tar sand is commercially unfeasible. Oil produced from tar sand would be five or six times more expensive than the current price of oil. The only reason any companies are even mildly interested in

involvement in this project is that they are being offered massive subsidies by the Federal Government! In a time when our government is cutting back on basic services, I am outraged that this type of wasteful boondoggle is even being considered. The economic problems associated with tar sand development are the least of my worries though. The environmental problems outlined in your agency's Tar Sand Triangle Draft EIS make for horrifying reading. The entire area would be completely and irrevocably destroyed. The process for extracting oil from the tar sand would cause "extensive subsurface fracturing over 38,790 acres resulting in subsidence and rockfalls. . . 50 million cubic yards of soils moved . . . 30,000 acres of soil disturbed . . . cryptogamic soil crusts destroyed . . . aquifers disrupted . . . 14,335 acres totally cleared of vegetation . . . adverse effects on visibility . . . noise levels high enough to cause hearing impairment . . . a minimum of 2,000 archaeological sites affected.

**38.17 RESPONSE:** The issue of whether or not tar sand development would or should occur in the Tar Sand Triangle is not the major focus of this wilderness EIS. Potential impacts from the development of the tar sand resource were addressed in the Draft EIS prepared for proposed lease conversions in the Tar Sand Triangle (USDI, NPS, 1984). This EIS is still in a draft stage and no decision has been made as to whether or not to allow the conversion of oil and gas leases or tar sand development. Although the area was addressed in the Combined Hydrocarbon Leasing Regional Final EIS (USDI, BLM, 1984), no specific proposals have been considered for future leasing of tar sand in the area. The Synfuels Corporation no longer exists to provide Federal funding for energy projects. See the responses to General Comments 15.40 and 15.41 and Specific Comment 38.9.

**38.18 COMMENT:** The Proposed Actions for the Dirty Devil, Horseshoe Canyon (South), French Spring-Happy Canyon, and Fiddler Butte WSAs may preclude an informed decision on whether to convert existing oil and gas leases to combined hydrocarbon leases in the Tar Sand Triangle Special Tar Sand Area. The Draft EIS for the Tar Sand Triangle did not identify a preferred alternative; neither has a preferred alternative been approved nor the Final EIS been completed. Since a preferred alternative has not been chosen by the Department for the Tar Sand Triangle, much less a decision made on whether to convert the leases, a decision should not be made on implementing or recommending a decision on wilderness for these

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 38: DIRTY DEVIL WSA (CONTINUED)

areas until the lease conversion decision is made. [National Park Service]

**38.18 RESPONSE:** See the responses to Specific Comments 38.9 and 38.17.

**38.19 COMMENT:** The analysis of uranium potential is incomplete. [State of Utah and Bureau of Mines]

a. Based on an inspection of Cotter's drilling data by the Utah Division of Oil, Gas, and Mining, the uranium potential may be restricted; but, this drilling did not fully evaluate the WSA's uranium potential. Deposits in the 1-3 million pound range may still be inferred.

b. The DEIS does not report results of uranium drilling in the Bull Pasture and Gibex Pts. areas. Between 1975 and 1980, Cotter Corporation drilled about 65 test holes in these two areas and discovered an orebody containing at least 39,000 tons of 0.04 percent  $U_3O_8$  (BOM Open File Report, MLA 25-84, 1984). The small size and low grade of the deposit, along with the current uranium market situation, suggest that the potential for development is low. The DEIS reports potential for commercial occurrences of uranium in the Moss Back Member of the Chinle Formation. Our investigation indicates the Moss Back is not conducive to uranium deposition in the WSA; it is blanket-like and continuous in character in this area. According to Johnson (USGS Bull. 1087-C, p. 92), where the Moss Back is blanket-like and uniform, it is relatively unfavorable for large uranium deposits.

**38.19 RESPONSE:** The Dirty Devil WSA has a moderate to high potential for uranium occurrence contained within the Monitor Butte Member of the Chinle Formation. This rating is based upon new geologic information and drilling data (see text of the Energy and Mineral Resources Section in EIS). Based on an analysis of this information, the WSA uranium resource potential rating has been changed from f2/c1 to f2/c3. This rating indicates that there is a moderate certainty for up to 500 metric tons of uranium oxide to be present within the WSA. This corresponds to approximately 1 million pounds.

**38.20 COMMENT:** Small precious metal deposits can still be of significant economic and strategic value. [State of Utah]

**38.20 RESPONSE:** Small precious metal deposits can be of significant economic and strategic value.

The Dirty Devil WSA is, however, predicted to have a low potential for the occurrence of precious metals (see Mineral and Energy Resources section of the Final EIS).

**38.21 COMMENT:** In the Geology section, there is only a superficial description of the mode of emplacement of the intrusive rocks. Information necessary for even basic economic geological determinations include what types of rocks were emplaced, what are the contacts with the country rocks like, and what alternations exist. Details of this nature are vital to assess economic potential. [State of Utah]

**38.21 RESPONSE:** No igneous rocks occur in the Dirty Devil WSA, so the information requested in the comment is not applicable to this area. Information pertinent to precious and base metal mineralization has been added to the Mineral and Energy Resources section of the EIS. See the response to Specific Comment 36.15.

**38.22 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**38.22 RESPONSE:** See the response to General Comment 14.27.

**38.23 COMMENT:** Dirty Devil WSA is ranked first for wilderness quality, but there are conflicts within the region. A potential conflict with tar sand exists. More favorable areas for this resource may exist elsewhere. Gas company reports give the WSA a high potential rating for economic accumulations of hydrocarbons. There are potential conflicts with water development also. [State of Utah]



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 38: DIRTY DEVIL WSA (CONTINUED)

**38.23 RESPONSE:** Based on (Bishop, 1985), the Dirty Devil WSA is not underlain by a potential tar sand resource. Therefore, a potential conflict with tar sand does not exist. Based on a review of geologic information related to the oil and gas potential of the WSA, a potential exists for the accumulations of oil and gas within stratigraphic traps formed within the Paradox Basin. Oil shows within oolitic and fossiliferous rocks have been encountered in wells drilled within the vicinity of the WSA. The potential therefore exists for small scattered accumulations of oil and gas to exist within the WSA. The certainty that these accumulations exist is low to moderate based on the location of the WSA within the Paradox Basin and the limited number of wells and extent of oil shows within or near the WSA. See the responses to General Comment 14.16 and Specific Comment 38.22 concerning water resources.

**38.24 COMMENT:** In the wildlife text, no mention is made of lizards, snakes, small mammals, nongame large mammals, or small birds. [Kim Jennyson]

**38.24 RESPONSE:** See the response to Specific Comment 37.14.

**38.25 COMMENT:** Threatened and Endangered (T and E) species are summarily dismissed. The Draft EIS notes no terrestrial T and E species are found in WSAs, and the only nonaquatic T and E animals are migrant bald eagles and peregrine falcons. It fails to note bald eagles are not mere migrants to Westwater Canyon WSA (they are permanent residents). Only the North Horseshoe Canyon WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise the findings on terrestrial T and E species are flawed. The FWS letter (Draft EIS, Appendix 4) indicates the black-footed ferret may inhabit several WSAs including the Dirty Devil. [Utah Wilderness Association]

**38.25 RESPONSE:** There are no known sightings of peregrine falcons within the Dirty Devil WSA. Black-footed ferrets may occur in or near the WSA, but are not known to be within the Dirty Devil WSA and the Horseshoe Canyon WSA (North and South). The text of the EIS has been updated and revised to track with Appendix 4.

**38.26 COMMENT:** On the Dirty Devil WSA, page 12, it says that parts of three allotments are in the WSA, but then, on page 16, there is a contradiction that says only one operator has AUMs in this WSA.

This is a contradiction and a pro-wilderness bias because it hides the true magnitude of economic impact in this particular WSA. All of the WSAs effectively prevent development of the water improvements. Remember that wilderness is a decision in perpetuity and to preclude future water developments just because none are currently planned is faulty logic and also a pro-wilderness bias. [Fremont River Water Users Association]

**38.26 RESPONSE:** There are five allotments in the Dirty Devil WSA. Table 5 has been updated to show that only three of those allotments have Animal Unit Months (AUMs) allocated within the boundaries of the WSA. A total of 366 AUMs which have been identified within the boundary of the Dirty Devil WSA are allocated to three permittees. The parts of the unallocated allotments within the WSA are either inaccessible or unproductive. Also, refer to the responses to General Comments 1.2, 14.7, 14.8, and 14.10.

**38.27 COMMENT:** Sierra Club members who have hiked the Dirty Devil area have found it to be one of the most impressive in the State. [Utah Wilderness Coalition]

**38.27 RESPONSE:** The Dirty Devil area is impressive. BLM's Proposed Action is the All Wilderness Alternative.

**38.28 COMMENT:** It should be noted that view sheds from the Orange Cliffs section of Glen Canyon NRA could be given greater protection by selection of a more restrictive alternative for the affected WSAs. The NPS concurs with the proposed alternative for the Dirty Devil WSA and recommend that its boundary along the river and on the west side of the canyon be considered for extension to the Glen Canyon National Recreation Area boundary. The area is rugged, wild and scenic, and beginning to receive some river running. [National Park Service]

**38.28 RESPONSE:** There may be merit to link up the Dirty Devil WSA with that portion of the river canyon within Glen Canyon NRA. However, consideration of boundary adjustments was made during the earlier wilderness inventory phase. See responses to General Comments 3.1 and 3.24. Even without wilderness designation, the scenic value has and will continue to be considered in BLM land use planning and environmental analysis processes. The BLM wilderness review focuses on BLM-administered public lands.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 38: DIRTY DEVIL WSA (CONTINUED)**

**38.29 COMMENT:** BLM is required by regulation in the planning policy to perform resource inventories. There is no indication from BLM documentation that such inventories were performed. Indeed, the Draft EIS notes that this WSA has not been extensively inventoried (for cultural resources) and the number and nature of any other sites is undetermined. Inventories for cultural, wildlife, plant, and other resources should be carried out. [Utah Wilderness Coalition]

**38.29 RESPONSE:** BLM has collected sufficient data for cultural, wildlife, plants, and other resources for the planning process completed in 1982 and for this EIS. Resource inventories will continue to be done as needs arise and in line with agency capabilities. See the responses to General Comments 9.6, 13.8, 16.2, and 20.2.

**38.30 COMMENT:** According to BLM, "Minor benefits from wilderness designation may result to wildlife, vegetation, watershed, cultural resources, recreation, visual resources, and soils." It is most likely that more than "minor" benefits would result from wilderness designation. Wilderness is the highest form of protection for these resources. In particular, peregrine falcons and bighorn sheep, which have historically inhabited this area, require the peace and solitude afforded by remote wilderness areas. [Utah Wilderness Coalition]

**38.30 RESPONSE:** The sentence quoted did not appear in the Draft EIS. Likewise, it does not appear in the Final EIS. The EIS contains a description and analysis of significant impacts, both beneficial and adverse, by individual resource topic.

**38.31 COMMENT:** The unit meets the standards set by the Wilderness Act on 49,000 acres according to the Draft EIS. BLM uses topographic and vegetative screening to define solitude. The proper definition for solitude is in Volume I, page 217. The entire unit meets the outstanding opportunities for solitude given this definition. The outstanding opportunities for primitive recreation include: backpacking, horseback riding, photographing geological, archaeological, and scenic sightseeing, and nature study; the entire unit meets the standards for wilderness. The Draft EIS states that the standards are not met on 12,000 acres, but no reasons are given as to why. [Kim Jennyson]

**38.31 RESPONSE:** BLM has identified standards for determining if an area has outstanding opportunities for solitude. These are clearly defined in Volume I (see Appendix 1, Part B, and the Glossary). Screening by vegetation and topography is a major contributing factor. The EIS is clear as to why the mandatory characteristic of solitude does not exist in part of the WSA. The mandatory characteristic of primitive and unconfined recreation also does not exist on the 12,000 acres based on the definition of "outstanding" shown in the Glossary. It should be noted that all of the WSA is included in BLM's Proposed Action for wilderness. Because the 12,000 acres which lack wilderness values are located in a complex and divided configuration, the entire WSA is recommended to make the unit manageable.

**38.32 COMMENT:** BLM formerly stated that the whole WSA has outstanding opportunities for both solitude and primitive recreation; the Draft EIS claims that 12,000 acres do not meet either standard. This downgrading of the wilderness values is apparently going to be used to reduce the recommended acreage in the Final EIS. The original analysis of the wilderness values should be reinstated since no documentation is given to support the change. BLM designates almost all of the WSA as Class A scenic quality and these scenic values should be protected by wilderness designation. [Owen Severance]

**38.32 RESPONSE:** The BLM's Proposed Action is the All Wilderness Alternative.

**38.33 COMMENT:** The site-specific analysis in the Draft EIS fails to point out that the entire 61,000-acre Dirty Devil WSA has been recommended for wilderness by the Six County Association of Governments. The Dirty Devil has always had broad support for wilderness. [Utah Wilderness Association]

**38.33 RESPONSE:** The letter of comment written by the Six County Commissioners Organization on August 11, 1986, concerning the Draft EIS, includes the following position: "Until these matters of wilderness reserved water rights, peripheral zones of influence, and interagency transfers are thoroughly addressed and resolved, it is the position of this organization, through mandate of its Board, that there must be no further wilderness designation in Utah."

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 39: HORSESHOE CANYON (SOUTH) WSA

**39.1 COMMENT:** In the inventory BLM reduced the size of this unit from 73,180 to 38,800 acres (BLM Intensive Inventory Final Decision, Nov. 1980). Now the WSA size again changed to 40,840 acres. The different acreages used in the inventory and the study stages need to be explained. [Utah Wilderness Coalition]

**39.1 RESPONSE:** The correct All Wilderness Alternative acreage for Horseshoe Canyon (South) is 38,800 acres. The other three alternatives are less than this figure. The 40,840 acres that was mentioned in the comment is not correct. Both the Draft and Final EIS use the figure of 38,800 for the WSA acreage.

**39.2 COMMENT:** In the inventory, BLM deleted a significant amount of land that met the mandatory wilderness criteria. A majority of these deletions occurred next to the Horseshoe Canyon Extension of Canyonlands National Park. This portion of the park is recommended for designation as wilderness, yet much of the adjacent land, similar in terrain and value, was not even included in the BLM WSA. Approximately 2/3 of this unit's boundary fails to follow the inventory policy. That portion of the boundary follows township lines instead of following significant human impacts. [Utah Wilderness Coalition]

**39.2 RESPONSE:** Deleted adjacent areas were not included because BLM determined that they did not possess the mandatory wilderness characteristics necessary for WSA qualification. Following legal subdivision lines with WSA boundaries is proper in certain locations and does not violate the BLM's Inventory Policy. Also, see the response to General Comment 22.3.

**39.3 COMMENT:** BLM has not informed us, as the Interim Management Policy (IMP) requires, of human impact activities within the WSA. BLM allowed new road construction and explorative drilling to occur which affected this area. That new activity matches exactly the area BLM now wants to drop from wilderness designation. This unit is a good example of why we request that human activities which have occurred in lands under wilderness review be documented and reported in the analysis. The rationale offers no reason why part of the unit is being dropped nor does the EIS mention this exploration activity. BLM allowed an activity that they claimed would not impair the designation of this area as wilderness. Yet in the

study, they recommend with no rationale to drop that area. [Utah Wilderness Coalition]

**39.3 RESPONSE:** Exploratory drilling inside the WSA consists of two wells drilled in 1956, about 20 years prior to IMP requirements. More recent exploratory drilling has occurred in the vicinity but outside of the WSA. Current IMP activities affecting WSAs are made known through an "early warning" mailing system to interested individuals and groups. IMP activities are not a factor when determining the BLM Proposed Action. The area not recommended for wilderness is in proximity to roads and corrals, where vehicular use contributes to low-quality wilderness values. See Appendix 11 in Volume I of the Final EIS for a summary of rationale for BLM's Proposed Action.

**39.4 COMMENT:** The Wilderness Inventory Policy requires BLM to draw boundaries to exclude significant impacts but include natural areas. In the area called the Head Spur, BLM deleted more than 1,000 acres to allow grazing access to State land in section 32. The access route is not a regularly maintained road. In order to cherry-stem a vehicle access route it must be a road. This route is a jeep track across blown sand and grasslands. There is no evidence of construction or maintenance. This is a route that is two tracks with the median as natural as the sides of the route. There are no other impacts in this area and the route occupies a total of 2 acres. All of the Head Spur should be included in this proposal. North of this area on the High Spur; BLM again has a boundary that excludes large natural areas. There is a vehicle way what is more evident than that route on the Head Spur. This 2.9-mile route and a small activity right next to it are the only impacts that BLM used to delete 3,800 acres. This route occupies only 3 acres. Even if this impact is significant, BLM can only delete 3 acres, not 3,800 as they did. A jeep track goes past Windy Point Spring down past Water Canyon near the Canyonlands National Park portion of Horseshoe Canyon. This is not a road, has not seen regular use, and has no sign of maintenance and is not a significant impact. The EIS should provide evidence that supports BLM's position. This single impact was used to justify deletion of 3,600 acres. BLM deleted the natural portions of Antelope Valley and the benches of Blue John Canyon as well as natural parts of Lost Valley. We request that the boundary be corrected to reflect wilderness review policy. [Utah Wilderness Coalition]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 39: HORSESHOE CANYON (SOUTH) WSA (CONTINUED)

**39.4 RESPONSE:** The courts have determined that the State has legal right of access to State sections. The route in question is used by motorized vehicles. Since this route provides existing legal access and is needed for the orderly administration and management of a multiple of resources (and because of its larger influence), the area in question was eliminated from the WSA during inventory. Those portions of Antelope Valley, Blue John Valley, and benches of Blue John Canyon were eliminated for the same reasons. The inventory phase has been concluded, as explained in the response to General Comment 3.1.

**39.5 COMMENT:** The Introduction to the Horseshoe Canyon (South) WSA acknowledges that this area is contiguous to a total potential wilderness of 62,000 acres. The Partial Wilderness Alternative would essentially separate the south area from the National Park and the north area by a full mile. This should be avoided by adopting the All Wilderness Alternative and by proposing State section 36 for exchange. If a particular site on the mesa top is deleted to avoid conflict, the State section which contains a major canyon junction should still be exchanged and included in the wilderness. Also, when adjusting boundaries to avoid conflicts, why is it necessary to delete an entire section? Would a smaller deletion accomplish the intended purpose? [John Veranth]

**39.5 RESPONSE:** This deleted area was determined to lack mandatory wilderness characteristics or to have low-quality wilderness values. See the above responses to Specific Comments 39.3 and 39.4. While the Draft EIS reflected the original State position that State sections would be exchanged, the Final EIS reflects the new State policy which generally is in opposition to exchange of State lands for wilderness purposes, therefore, it is assumed that the State section 36 would not be transferred to Federal ownership as part of the BLM wilderness Proposed Action. It is this section 36 which interrupts the true quality connection between the WSA and the National Park unit.

**39.6 COMMENT:** The area has unique topography that clearly qualifies it for complete wilderness designation. [Sierra Club, Cache Group]

**39.6 RESPONSE:** Unique topography does not necessarily qualify an area for wilderness designation. An area qualifies as wilderness if it contains the mandatory wilderness characteristics.

**39.7 COMMENT:** Horseshoe Canyon (South) WSA is considered to rank high for wilderness values and moderate to high for conflicts in comparison with other WSAs in the region. These conflicts may be eliminated with boundary adjustments. At this point, however, more analysis in two areas is needed to more precisely delineate boundary changes: (1) livestock conflicts, in terms of effect of designation on permittees' base water rights; and (2) conflict with moderate uranium potential in the south half of the unit. [State of Utah]

**39.7 RESPONSE:** Additional information and analysis on the two topics have been included in the Final EIS. The springs and seeps in the WSA have already been claimed. Water rights would not be affected but restrictions could be placed on future developments. Uranium exploration is not projected for this WSA in the Final EIS.

**39.8 COMMENT:** The northern part of this area abuts the Horseshoe Canyon portion of Canyonlands National Park. BLM's main proposal is to establish a road corridor across Horseshoe Canyon. There is no need for this corridor and nothing in the current plan supports this. BLM allowed a mineral company to start building this road corridor. No reports were filed to meet the IMP requirements. BLM has not required reclamation of the work done and now wants to delete the area from designation. The Secretary of the Interior said that no areas are being deleted because of allowed actions. Here is an example of a case where BLM allowed an action and now is selectively dropping that part of the area because of illogical reasons which are in conflict with the Wilderness Study Policy. No management problems are specified which conflict with wilderness management. The presence of a road that is used does not justify a 2-mile setback from that boundary road. By the way, this road is used far less than other roads next to candidate wilderness areas. A corral outside the area does not affect wilderness management. [Utah Wilderness Coalition]

**39.8 RESPONSE:** BLM has no intention of establishing a road corridor across Horseshoe Canyon. See the responses to Specific Comments 39.3 and 39.4.

**39.9 COMMENT:** BLM's partial wilderness proposal doesn't make sense. T. 27 S., R. 15 E., sec. 36 is identified for exchange, but even if it isn't exchanged, there isn't any reason for eliminating the land on either side of it from the wilderness proposal. The

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 39: HORSESHOE CANYON (SOUTH) WSA (CONTINUED)**

WSA boundaries should be moved out to topographic features or intrusions since the present section line boundaries are unmanageable. The lack of "screening" was improperly used to claim that 2,500 acres do not have outstanding solitude. All of the WSA has Class A or Class B scenic quality which should be protected by wilderness designation. [Owen Severance]

**39.9 RESPONSE:** See the response to Specific Comment 39.4.

**39.10 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the claims in the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the earlier proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**39.10 RESPONSE:** See the response for Specific Comment 36.13.

**39.11 COMMENT:** From the Summary Table it appears that three reservoirs are in the area proposed to be deleted in the Partial Wilderness Alternative. Is this the case? Can a smaller deletion such as a cherry-stem accomplish the same purpose? [John Veranth]

**39.11 RESPONSE:** The main narrative and the Summary Table have been revised to clarify the location and impacts related to existing and proposed livestock reservoirs. Maintenance of existing watering facilities would be allowed under wilderness management policy. However, the construction of new reservoirs likely would not be allowed. Cherry-stemming for construction of reservoirs would seem to be even less likely. Therefore, it appears that the No Action/No Wilderness Alternative would be the only alternative which would allow the proposed reservoir construction for livestock.

**39.12 COMMENT:** The Proposed Actions for the Dirty Devil, Horseshoe Canyon (South), French Spring-

Happy Canyon, and Fiddler Butte WSAs may preclude an informed decision on whether to convert existing oil and gas leases to combined hydrocarbon leases in the Tar Sand Triangle Special Tar Sand Area. The Draft EIS for the Tar Sand Triangle did not identify a preferred alternative; neither has a preferred alternative been approved nor the Final EIS been completed. Since a preferred alternative has not been chosen by the Department for the Tar Sand Triangle, much less a decision made on whether to convert the leases, a decision should not be made on implementing or recommending a decision on wilderness for these areas until the lease conversion decision is made. [National Park Service]

**39.12 RESPONSE:** See the response to Specific Comment 38.17.

**39.13 COMMENT:** The air quality impacts of the Proposed Action relate to prevention of significant deterioration (PSD) requirements. The Final EIS needs to explain more thoroughly the policy options and environmental consequences of designation of BLM wilderness areas as Class I. Furthermore, any proposed (or already excluded) area may already be precluded in full or in part from certain resource development because of the potential for that development to exceed PSD increments in current or potential Class I areas. The following example illustrates this point. Tar sand development is listed as a medium or high potential development in three WSAs; Fiddler Butte, Horseshoe Canyon (South), and French Spring-Happy Canyon, all part of the Tar Sand Triangle. The development of tar sand resources within the Tar Sand Triangle is constrained by the adjacent Class I air quality designations. Accordingly, EPA concluded in 1984 in its review of the Tar Sand Triangle Draft EIS that the environmental impact of tar sand development would be environmentally unsatisfactory unless more stringent air quality control measures or appropriate reduction in development levels were pursued. EPA suggests that further consideration be given to the likelihood of such development and possibly allow these WSAs to be considered in the Proposed Action. [U.S. Environmental Protection Agency]

**39.13 RESPONSE:** See the responses to General Comments 10.4 and 15.41, and Specific Comment 38.17. Currently all BLM WSAs are Class II. Under BLM's Wilderness Management Policy, designated wilderness areas would continue to be managed as Class II until such time as the State of Utah may reclassify them (which may be unlikely). WSAs would not auto-

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 39: HORSESHOE CANYON (SOUTH) WSA (CONTINUED)

matically be designated Class I as a result of wilderness designation. Neither the Clean Air Act nor any other laws or regulations require that BLM WSAs or new designated wilderness areas be Class I. Current minerals information indicates that tar sand resources are lacking in the Horseshoe Canyon (South) WSA.

**39.14 COMMENT:** Surface-disturbing activities related to locatable mineral development under "undue/unnecessary" guidelines, oil and gas development with Category 1 stipulations, ORV use, and new vehicle roads. The National Park Service has found that these activities would severely impair the many special features found in their portion of Horseshoe Canyon. In implementing the development stipulations, BLM has a long history of requiring resource protection as long as it presents no burden to the operator. If the operator doesn't follow these stipulations, BLM has not forced compliance. Wilderness designation would be action-forcing, leading to BLM requiring compliance with the resource protection policy. The EIS needs to specifically detail each resource, the required protection, and the benefits received under the protection of wilderness. [Utah Wilderness Coalition]

**39.14 RESPONSE:** Wilderness designation is for the purpose of preserving wilderness characteristics (i.e., naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Special features can be and are protected by other laws and policies. It is not the principle intent of BLM's wilderness management to protect special features on adjacent National Park lands. See also the responses to General Comments 7.1 and 23.15. BLM's information indicates that there is little or no ORV use in the Horseshoe Canyon (South) WSA, and considering feasibility and economics, the probability of mineral development is low. Therefore, the perceived threat to special features may be greater than the actual threat. The Final EIS reflects this information.

**39.15 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The northeast portion of Garfield County and the eastern portions of Wayne and Emery Counties, WSA areas, including Horseshoe Canyon (South), have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic and Mesozoic age rocks. Texaco has leasehold interests in many of these areas and

would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**39.15 RESPONSE:** The potential for oil and gas accumulations within the WSA has been re-evaluated and, where applicable, information has been added to the Mineral and Energy Resource section of the EIS. The Final EIS recognizes that limited exploration for oil and gas is likely, but the probability of discovering economically producible deposits is low. This information has been considered in determining the wilderness Proposed Action for the Final EIS. See the responses to General Comments 15.1, 15.2, and 15.19.

**39.16 COMMENT:** This area needs more drilling data to adequately appraise the tar sand potential. The 34 million barrels of recoverable oil sound too low based on surface mining techniques, but may be high if in-situ methods are proposed. [State of Utah]

**39.16 RESPONSE:** The best available data has been used in the preparation of the Final EIS, including recent mineral reports for the Horseshoe Canyon (South) WSA, by the U.S. Bureau of Mines and U.S. Geological Survey. Those reports included additional field work but not new drilling. Because of the costs and other factors, it is not feasible to conduct new drilling for purposes of the wilderness EIS.

**39.17 COMMENT:** There is not enough geologic information from which to predict economic potential. The geology text is a geomorphic rather than a geological overview. [State of Utah]

**39.17 RESPONSE:** See the response to Specific Comment 36.15.

**39.18 COMMENT:** I adamantly oppose BLM's plan to allow tar sand development along the top of the Orange Cliffs. This incredibly inefficient method of oil extraction would destroy the wilderness character not only of the Dirty Devil Canyon system, but of adjacent Glen Canyon National Recreation Area and Canyonlands National Park lands as well. I specifically endorse wilderness designation. [Barry Lonik]

**39.18 RESPONSE:** See the response to General Comment 15.54 and Specific Comment 38.17.

**39.19 COMMENT:** Important fossils of mammoths are found here. These are among the oldest and

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 39: HORSESHOE CANYON (SOUTH) WSA (CONTINUED)**

richest examples of prehistoric mammals to be found in Utah. [Sierra Club, Cache Group]

**39.19 RESPONSE:** The presence of fossils has been noted in the Final EIS. If designated as wilderness, the paleontological resources in this WSA would be addressed specifically in the Wilderness Management Plan. Fossil sites would be afforded added protection from incidental disturbance because of restrictions and limitations on vehicle use and development. Refer to Volume I, Appendix 1, Part A, 5. Paleontological Resources, for additional information.

**39.20 COMMENT:** BLM ignores the importance of this habitat for wildlife. This is one of the most important antelope areas in the region. For this reason the area being deleted has high wilderness value. [Utah Wilderness Coalition]

**39.20 RESPONSE:** BLM considers all lands important for availability of habitat to various species of wildlife; however, not all areas have the same habitat potential or afford feasible opportunities for wildlife habitat enhancement. Antelope do not require wilderness areas for prime habitat. A good example is the Parker Mountain area where the most prolific antelope herd in the State thrives in an area filled with roads and livestock developments. Another example is the Icelander Wash antelope herd in eastern Utah where the herd has grown and expanded along a major highway, coal washing facility, heavily used dirt road, and a major railroad. An area is designated wilderness to preserve wilderness values. If other resource values are enhanced by wilderness designation, then so much the better. The presence of antelope is not sufficient justification for including the omitted 2,800 acres in the wilderness Proposed Action.

**39.21 COMMENT:** Threatened and endangered (T and E) species are summarily dismissed. The Draft EIS notes no terrestrial T and E species are found in the WSA and the only nonaquatic T and E animals are migrant bald eagles and peregrine falcons. Only the Horseshoe Canyon (North) WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise the findings on terrestrial T and E species are flawed. The UFWS letter (Draft EIS, Appendix 4) indicates the black-footed ferret may inhabit several WSAs, including Horseshoe Canyon North and South. [Utah Wilderness Association]

**39.21 RESPONSE:** There are no known sightings of peregrine falcons within the Horseshoe Canyon (South) WSA. Black-footed ferrets may occur in or near the WSA but are not known to be found within Horseshoe Canyon (North and South) WSAs. The text of the EIS has been updated and revised to track with Appendix 4.

**39.22 COMMENT:** While BLM has not completed the required inventories of archaeological sites, rare and endangered species, wildlife, and other wilderness values, a large number of special features has been found. BLM makes no comment on whether some of these special features are in the portion of the unit recommended for deletion. On a map, the information on special features needs to be displayed to correlate the recommendation values. [Utah Wilderness Coalition]

**39.22 RESPONSE:** The EIS process requires no special inventories for archaeological sites, rare and endangered species, or wildlife to be completed in the determination of the wilderness Proposed Action. The EIS is based on the best information available, including consultation with the State Historic Preservation Officer and the Fish and Wildlife Service. The Horseshoe Canyon (South) WSA has no threatened and endangered wildlife species inhabiting the area and there is no critical habitat in the area. This WSA does meet all the standards set by the Wilderness Act for such wilderness values as size, naturalness, solitude, and primitive and unconfined recreation. Special features which are additive to the wilderness values are identified in the EIS narrative. The special features associated with each of the Partial Wilderness Alternatives are explained for those alternatives. Including a detailed map of special features in the EIS would not provide information not already described in the text. See the response to General Comment 26.1.

**39.23 COMMENT:** Wilderness designation will protect cultural resources. [Sierra Club, Cache Group]

a. Designation of this area as wilderness will protect important historical sites such as (1) Cowboy Cave, (2) Jim Walters Cave, and (3) Barrier Canyon style rock art.

b. This WSA contains numerous archeological and historical sites that should be protected from theft, vandalism, and development through wilderness designation as proposed by the Utah Wilderness Coalition.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 39: HORSESHOE CANYON (SOUTH) WSA (CONTINUED)**

**39.23 RESPONSE:** There is difference of opinion on how much protection wilderness designation would actually provide to cultural resources. While it is true that the designation would provide cultural resources with some added degree of protection from disturbance due to development activities, the added publicity resulting from wilderness designation may initially attract more visitor use and resultant vandalism or other degradation. Further, current experience with legislation aimed at curbing the theft of and vandalism to cultural resources shows clearly that the intended goal is not being fully achieved. There is no reason to assume that wilderness designation would provide the added enforcement needed to stop theft and vandalism. In fact, the level of manpower and equipment needed to patrol sites to curb these activities may not be compatible with wilderness management. In summary, wilderness designation would provide some added protection from development, but not necessarily from theft, vandalism, and trampling by visitors. Vandalism would continue to be a problem and could increase as the area's use increased. See the response to General Comment 20.1.

**39.24 COMMENT:** The Horseshoe Canyon WSA is of great significance because of the unique and magnificent prehistoric rock art found there. The problem of the cultural affiliation of Barrier Canyon style rock art continues to baffle archaeologists. The cultural resources in the WSA contain much valuable information which may be of considerable help in solving that problem. I have done archaeological survey work for the Park Service at Horseshoe Canyon, and also have spent time in the WSA exploring it for archaeological sites. I recently found 2 major habitation sites containing Barrier Canyon style pictographs. There are 5 Barrier Canyon style pictograph sites (2 in habitation sites), 11 habitation sites (including Cowboy Caves), grainery sites, 5 petroglyph sites, and dozens of lithic scatter sites. In addition, there is a habitation site and petroglyph panel in that square mile left out of the WSA between the southern boundary of the Horseshoe Canyon detached portion of Canyonlands National Park and the northern boundary of the WSA. Indeed the WSA is incredibly rich in cultural resources. In addition, the many caves found in the WSA undoubtedly contain material of value to paleontologists. The WSA is amazingly rich in aesthetic resources. The rock forms and colors are breathtaking especially in the morning and evening light. The WSA is full of fantastic domes, weird spires, awesome cliffs, giant alcoves (many containing seeps), and on the canyon

rims, tremendous panoramas. Certainly the Horseshoe Canyon WSA deserves maximum protection. Indeed, it deserves to be included in the detached portion of Canyonlands National Park. The WSA at the very least deserves the all wilderness designation. In addition, all of Bluejohn Canyon and that square mile above mentioned deserve to be included. [Gary Cox]

**39.24 RESPONSE:** The cultural resource information is included in the Final EIS. Also, see the responses to General Comments 7.1 and 20.1, and Specific Comments 39.5 and 39.24.

**39.25 COMMENT:** The estimate of 100 visitor days per year in the South area seems low since many visitors to the pictograph panels in the National Park portion of Horseshoe Canyon continue to hike a distance upstream and enter the WSA. [John Veranth]

**39.25 RESPONSE:** A visitor day is 12 visitor hours which may be aggregated by one or more persons in single or multiple visits. Therefore, 100 visitor days could be 1,200 visitors in the WSA who each stay 1 hour.

**39.26 COMMENT:** The WSA acreage identified by BLM as being too close to local roads, and therefore unqualified for wilderness designation, should be a part of the final wilderness proposal. We do not feel that these acres are too close to any road for subsequent reduction in wilderness values in this WSA. [Sierra Club, Cache Group]

**39.26 RESPONSE:** The objective of the BLM Proposed Action is to eliminate from designation the area that lacks opportunities for both solitude and primitive and unconfined recreation (i.e., has low wilderness values). The Final EIS recognizes that visitation and use is light in this area.

**39.27 COMMENT:** BLM indicates that "Wilderness designation could provide minor benefits to seven other resources." In a consistent pattern used by BLM, multiple-use benefits in wilderness areas are underestimated. [Utah Wilderness Coalition]

**39.27 RESPONSE:** It is not the intention of BLM to underestimate multiple-use benefits derived from wilderness designation. Related benefits to many multiple uses most often are minor, since most of these uses already exist in a de-facto wilderness condition and they are protected by existing law and policy. In addition, many of these values are intangible



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 39: HORSESHOE CANYON (SOUTH) WSA (CONTINUED)

and difficult or impossible to quantify. The purpose of wilderness designation is to preserve principle wilderness values (particularly naturalness, solitude, and outstanding primitive recreation, as well as unique scientific aspects); if other resource values (such as habitat for certain wildlife species, watershed, special plants, scenery, or other aspects) are protected, then this would be an added benefit. Wilderness designation usually would accommodate multiple uses (such as recreation and wildlife) on a limited basis, but it is not the more traditional concept of multiple-use management. See the response to General Comment 1.2.

**39.28 COMMENT:** We disagree with BLM's finding that parts of this WSA contain no solitude or primitive outdoor recreation opportunities. The entire area clearly has outstanding opportunities for primitive outdoor recreation and solitude within a natural setting that clearly outweigh any potential development plans and values. [Sierra Club, Cache Group]

**39.28 RESPONSE:** The area that would not be designated lacks vegetative and topographic scenery. In addition, opportunities for solitude and primitive recreation are less than outstanding in this area. Since many wilderness values are subjective, BLM has relied on individual judgment of the field personnel most familiar with the WSA to determine solitude and primitive recreation attributes. The same criteria were used by all those making these judgments. It is common that different people may disagree on matters of subjective judgment.

**39.29 COMMENT:** The area eliminated in the Proposed Action is adjacent to the Horseshoe Canyon unit of Canyonlands National Park, and thus would act as a buffer to the park. Although this park unit is not proposed wilderness, it is managed as a no-vehicle use area except for a small area near the campsites in the canyon. Designation of the Horseshoe Canyon WSA as wilderness would make management of the park unit easier. An all wilderness designation would make BLM's job easier too, since there would be less boundary of either unit exposed to potential vehicular incursions. We are assuming that the State section south of the park would be acquired under this alternative. There are not significant resource conflicts. BLM's assessment of opportunities for solitude and recreation reflect a narrow and biased attitude toward these subjective qualities. We have hiked the 2,800-acre nondesignated area, and there are plenty of opportunities for solitude--only 100 visitor days/year estimated (probably high). You would have to

look for days to find another person! Cutting out the 2,800 acres interrupts the overall hiking. But if the 2,800-acre strip is not designated, these hikes might have to cut through mineral developments in the middle of an extended, otherwise completely wilderness, hike, and that would interfere with the wilderness experience! [Tim Graham]

**39.29 RESPONSE:** The Horseshoe Canyon unit of the National Park has been identified by the National Park Service as suitable for wilderness designation. It is not the function of BLM WSAs or wilderness areas to become buffers for the National Parks. See the responses to General Comment 7.1 and 23.15. It is unlikely that the 2,800 acres in question would be disturbed by mineral development, as explained in the description of the No Action/No Wilderness Alternative.

**39.30 COMMENT:** Wilderness designation coincides with Natural Zone and recommended wilderness in the Glen Canyon General Management Plan (GMP) for these areas: Burning Hills, Escalante Canyon Tract 5, Horseshoe Canyon (South), Fiddler Butte, Little Rockies, Grand Gulch, and Dark Canyon. [National Park Service]

**39.30 RESPONSE:** The All Wilderness Alternatives for the Horseshoe Canyon (South), Little Rockies, and Fiddler Butte WSAs, and also the Partial Wilderness Alternatives for the Fiddler Butte WSA would complement the NPS wilderness recommendations. The Partial Wilderness Alternatives for the Horseshoe Canyon (South) would be less consistent from a wilderness perspective, but the major difficulty would be an intervening State section, as noted in the response to Specific Comment 39.5.

**39.31 COMMENT:** Designation of this complete area as wilderness would complement National Park Service management plans and wilderness proposals for Glen Canyon NRA and Canyonlands National Park. [Sierra Club, Cache Group]

**39.31 RESPONSE:** See the response to Specific Comment 39.31.

**39.32 COMMENT:** The National Park Service believes the All Wilderness Alternative would make a manageable unit consistent with the proposed wilderness area in the Horseshoe Canyon section of Canyonlands National Park. Justification for eliminating 2,800 acres from the wilderness alternative is the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 39: HORSESHOE CANYON (SOUTH) WSA (CONTINUED)**

close proximity to heavily used road and corrals. The heavily traveled road apparently is the road that leads to the Dead Man's trailhead into Horseshoe Canyon. Our estimates are that 10 to 20 vehicles a year travel on this road to visit Horseshoe Canyon. The rancher in the area may use it an additional 10 times a year. We question whether it is appropriate to classify this use as "heavy." There is only a corral in T. 27 S., R. 15 E., sec. 33. The corral is approximately 3/8 of a mile from the proposed WSA boundary. Since the terrain in the vicinity is broken, the corral would probably not be visible from the WSA. Part of the excluded area in T. 27 S., R. 15 E., sec. 35 is Blue John Canyon. This canyon is spectacular for the length of the canyon, therefore we disagree that this is a low quality area. We believe T. 27 S., R. 15 E., sec. 36, should be included in the proposal. Presently this is a State section, but we suggest that BLM include it in their WSA and identify it for acquisition through exchange or sale. Blue John Canyon and Horseshoe Canyon intersect in Section 36. This section is spectacular and meets the criteria for a BLM WSA. Under Environmental Consequences, we suggest the EIS recognize that the paleontological sites in the southeast portion of the WSA would be afforded a higher degree of protection if designated wilderness. [National Park Service]

**39.32 RESPONSE:** See the responses to Specific Comments 39.4, 39.5, 39.24, 39.27, and 39.29.

**SECTION 40**  
**FRENCH SPRING-HAPPY CANYON WSA**

**40.1 COMMENT:** The boundary of the unit on the west, northwest, and south cuts off the tops of canyons and fails to include important natural values, as well as other lands that were incorrectly deleted from the wilderness inventory and are not under wilderness study. The boundary should be redrawn to comply with the Organic Act Directive which directs that WSA boundaries be drawn to the edge of imprints of man. There is no reason for the French Spring-Happy Canyon WSA boundary not to extend to the boundary of the Fiddler Butte WSA. Deep in the Dirty Devil Canyon, an outstanding sandstone canyon twists beyond the WSA to Poison Spring Canyon. This portion of the river contains the same wilderness character as that found within the WSA. In Happy Canyon, the only mark of man is an old mining track near the Dirty Devil River which is barely, faintly noticeable.

Sams Mesa and the southwest portion of the Dirty Devil Canyon contain only post-FLPMA roads and should be included in the WSA, as should the spectacular Big Ridge, which is completely natural from Two Pipe Springs to the west. Old landing strip tracks are no longer maintained and are almost completely revegetated. From the landing strip west, there are no significant human impacts. From the Pinnacle in Happy Canyon to the junction of Poison Spring Canyon and the Dirty Devil River, there are no manmade intrusions which significantly impair the naturalness of the area. [Utah Wilderness Coalition]

**40.1 RESPONSE:** The areas discussed in the comment were dropped in the inventory because they lacked wilderness character, and they are no longer part of the study process. Public input was obtained and considered during the inventory. See the response to General Comment 3.1.

**40.2 COMMENT:** BLM has never totally corrected the inventory on this area. BLM used their judgmental discretion to argue that because of size, some canyons do not have outstanding opportunities for solitude or recreation. We disagree with the agency. The thousand-foot deep canyons and side canyons completely isolate visitors and are highly scenic. Even if we accept BLM's argument, they committed a serious procedural error and violated inventory policy. BLM is required to determine if an area has outstanding opportunities for solitude or wilderness activities somewhere in the unit. Every acre does not need to have outstanding opportunities to qualify. BLM correctly did find these qualities in the area. The boundary is not to be determined by the presence of wilderness-grade solitude or recreation. The boundary is supposed to be determined by the imprints of man. [Utah Wilderness Coalition]

**40.2 RESPONSE:** These areas were determined by the inventory to lack wilderness character. The final inventory decisions considered public input and were subject to appeal. Certain areas were appealed and that process has been concluded. See the response to General Comment 3.1.

**40.3 COMMENT:** It appears that a logical and manageable BLM wilderness should extend northward from the Glen Canyon NRA boundary (in Range 14 East) to include all of the WSAs originally described as Dirty Devil, Fiddler Butte, and French Spring-Happy Canyon plus the undescribed, unincorporated, but highly deserving territories in between (in Ranges 13,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

14, & 15 of Townships 30 and 31 South), such as North and South Hatch Canyons, the Pinnacle, and The Big Ridge. And don't argue that there are too many un-restorable developed intrusions. I've been there and will not accept that argument AT ALL! The landing strip intrusion arguments are totally invalid. The South Fork of Happy Canyon "road" is no longer a road and should not be used as a boundary. The North Hatch Canyon "jeep trail" is just that--a trail, not a road, therefore not a boundary. Neither the jeep trail across The Big Ridge nor the landing strip there constitute un-restorable intrusions. [T. Young]

**40.3 RESPONSE:** See the response to Specific Comment 40.1.

**40.4 COMMENT:** We are disappointed that BLM has at first recommended the 11,500-acre "Partial Wilderness Alternative" for this truly outstanding wilderness area and then, for no apparent reason, decided to recommend the "No Action Alternative." We support the 25,000-acre "All Wilderness Alternative" for French Springs-Happy Canyon. [Sierra Club, Cache Group]

**40.4 RESPONSE:** The Draft EIS contained several inadvertent editorial errors, including the labeling of the Partial Wilderness Alternative as the Proposed Action. That was corrected by the issuance of an errata sheet, as published in the on April 2, 1986 (Federal Register, Volume 51, No. 63) and as distributed to the EIS mailing list. The reason for a No Action/No Wilderness proposal was based on the potential for significant mineral resource conflicts. The matter has now been reconsidered and the Partial Wilderness Alternative of 11,110 acres is BLM's Proposed Action in the Final EIS. See the response to General Comment 25.8.

**40.5 COMMENT:** BLM needs to discuss the Commodity Production Alternative and how it applies to this area. It would appear that with the unlikely development of minerals, the All Wilderness recommendation would also be part of the Commodity Production Alternative. For the scenario mostly likely to occur, the commodity production differences between the alternatives for minerals is zero. [Utah Wilderness Coalition]

**40.5 RESPONSE:** The Volume I Commodity Production Alternative includes the No Action/No Wilderness Alternative for the French Springs-Happy Canyon WSA since this would allow maximum opportunities

for tar sand exploration and development in the long-term future. See the response to General Comment 15.41.

**40.6 COMMENT:** Although the alternatives are not clearly defined, it appears that BLM has not applied them to this whole area because of previously unjustified exclusion of thousands of acres. [Utah Wilderness Coalition]

**40.6 RESPONSE:** The alternatives are clearly defined for the WSA. They do not include lands outside of the WSA as these lands did not qualify during the inventory. Boundaries for the WSA are based on criteria which primarily avoid roads and other obvious imprints of man, as well as containing the other mandatory characteristics of solitude and primitive-type recreation. These boundaries were determined during the inventory phase. See the response to General Comment 3.1. BLM is required to evaluate a reasonable range of alternatives. This was done for the French Spring-Happy Canyon WSA by use of No Action/No Wilderness, Partial Wilderness, and All Wilderness Alternatives.

**40.7 COMMENT:** This WSA is a major side canyon of the Dirty Devil River and also is adjacent to the Dirty Devil WSA (UT-050-236A). Barely any mention of the two WSAs being adjacent to each other is made in either WSA text in the Draft EIS. Reference is made in the French Spring WSA (Volume IV, pg. 25) referring to Tar Sand Development, ". . . would degrade wilderness values in the adjoining Dirty Devil and Horseshoe Canyon(s) WSAs. Also affected would be Fiddler Butte WSA and proposed wilderness in Glen Canyon NRA and Canyonlands National Park . . ." This fact of it being situated so near other WSAs and planned wilderness areas should be brought to the forefront of the report with better clarity and more importance instead of being hidden in a paragraph in the No Action/No Wilderness Alternative on wilderness values. It was also mentioned on page 35 of the partial alternative. The fact that it is so close to these other wilderness areas should have as much importance positively as negatively (tar sand development). [Michael Salamacha]

**40.7 RESPONSE:** Information has been added to the Introduction for the French Spring-Happy Canyon WSA to point out the proximity of nearby WSAs. Also, Volume I addresses the concept of WSA clusters with two alternatives. One of these cluster alternatives is analyzed in Chapter 4 of Volume I.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

**40.8 COMMENT:** The Draft EIS fails to consider an alternative proposed by the Utah Wilderness Coalition. The Coalition submitted detailed maps to BLM and offered information detailing the wilderness values within these areas. The Utah congressional delegation requested that BLM prepare a map showing the Coalition's proposal relative to other alternatives. BLM has no mention of this proposal in the Draft EIS. In the French Spring-Happy Canyon area, BLM failed to follow the guidelines for defining wilderness boundaries for WSAs. BLM excluded major mesa tops and canyon bottoms. These areas met the naturalness criterion and contain outstanding wilderness values. This area makes a logical and legal extension of the wilderness area, including many critical values BLM has not considered. This is a reasonable alternative meeting the requirements of lands that qualify for wilderness designation. [Utah Wilderness Coalition]

**40.8 RESPONSE:** See the responses to General Comments 3.1 and 3.7.

**40.9 COMMENT:** The Large Cluster Concept Alternative would include this area with the adjacent National Park Service lands. This alternative appears not to have been discussed for this area. [Utah Wilderness Coalition]

**40.9 RESPONSE:** This WSA was not included in the Large Cluster Concept Alternative because it does not meet the criteria listed for that alternative in Volume I. It does not total 100,000 acres or more together with the Dirty Devil WSA and it is not adjacent to any National Park Service proposed wilderness which would contribute to attain that total.

**40.10 COMMENT:** Even though the entire French Spring-Happy Canyon/Dirty Devil area contains lands that BLM says have some of the highest possible wilderness values, BLM says that this should not be the Paramount Wilderness Alternative. BLM has no explanation why this whole area does not qualify. BLM failed to include any discussion of the application of this alternative to this area. [Utah Wilderness Coalition]

**40.10 RESPONSE:** The Dirty Devil WSA is included in the Paramount Wilderness Alternative in Volume I. It is considered to have somewhat higher wilderness qualities and fewer resource conflicts than French Spring-Happy Canyon WSA.

**40.11 COMMENT:** Under maximum development (commodity production), BLM maintains that 20,460

acres of the current WSA could receive surface disturbances. BLM provides no information on the nature of these disturbances and the purpose. This needs to be included in the Final EIS. BLM also does not show the location of these potential disturbances. A map showing these should be used for the maximum development alternative. This alternative needs to be considered in the EIS. [Utah Wilderness Coalition]

**40.11 RESPONSE:** Estimates of surface disturbance have been revised and further explained for the Final EIS. Locations are explained in the text rather than on a map.

**40.12 COMMENT:** French Spring-Happy Canyon WSA is considered to have low wilderness quality and high conflicts relative to other WSAs in the region. High conflict exists with the potential tar sand resource. There are, nevertheless, some special features which need to be balanced with the resource conflict. [State of Utah]

**40.12 RESPONSE:** About 44 percent (11,000 acres) of the French Spring-Happy Canyon WSA has high quality wilderness characteristics. However, a high potential does exist for mineral conflicts. If the No Action/No Wilderness Alternative is implemented, wilderness values would likely be degraded. The EIS analysis reflects this situation.

**40.13 COMMENT:** We found the "road" indicated as a southern boundary to the WSA to be nonexistent where it is shown following the middle of Happy Canyon below the major forks. Fragments of a way here were interrupted by drop offs, often 400 feet sheer, with no sign of any trail, way, or road for distances of over a mile. The definition of a road according to BLM includes "have been improved and maintained . . . to ensure regular and continuous use." For this "road" to be used on any basis, regular or not, would require not merely a little maintenance, but a total reconstruction including rerouting. For this reason and others stated above, I feel that this southern boundary should be set back and this "road" be considered not a road, not a way, not a trail (there isn't and can not be regular passage of any sort of vehicle--even a motorcycle!), but a cartographic artifact. [Michael Van Note]

**40.13 RESPONSE:** At the time of the inventory (1979-1980), BLM field personnel examined the area and found that the route met the definition of a road; consequently, the WSA boundary was determined in

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

that location. The inventory phase of the study has been completed and will not be re-opened as part of this study. See the response to General Comment 3.1.

**40.14 COMMENT:** In earlier comments, members of the Utah Wilderness Coalition requested that BLM publish in the Draft EIS a record of the actions BLM has allowed to occur since the start of the wilderness review in 1976. We argue that BLM has continued to allow actions in some cases without reclamation in parts of the wilderness study area BLM recommends unsuitable for designation. [Utah Wilderness Coalition]

Here are a few of the actions that BLM has allowed:

Action	BLM Response
Oil Well Exploration	Area dropped from wilderness study.
Uranium Exploration	Area dropped from wilderness study.
Tar Sand Exploration	Area dropped from wilderness study, appeal reinstated area, BLM now recommends area unsuitable.
Mining Assessment Work	Area dropped from wilderness study, appeal reinstated area, BLM now recommends area unsuitable.
Construction of Reservoirs	Area dropped from wilderness study, appeal reinstated area, BLM now recommends area unsuitable.

We request a map of the total areas potential WSA be produced with all actions since 1976. We further request that BLM give a written description of each action, its significance on wilderness values, and describe its current condition.

**40.14 RESPONSE:** BLM records do not show any actions allowed in French Spring-Happy Canyon under IMP after the boundaries of the WSA were established. The French Spring-Happy Canyon WSA was not one of the appeal units. Also, see the response to General Comment 5.2. Exploration and development actions outside of WSAs are not subject to the provisions of IMP and are not relevant to BLM Proposed Action for lands within WSAs.

**40.15 COMMENT:** We raised the issue of interim management problems in the Dirty Devil region as a whole. We asked that BLM provide a full record of the area since 1976. BLM incorrectly concludes, "No WSA acreage was excluded from suitability under this alternative due to post-FLPMA-related disturbances." We have listed a mining trespass activity which occurred in areas BLM is excluding from recommendation. Illegal exploration by Cotter Corporation throughout the area unnecessarily caused a majority of the acreage deleted from wilderness con-

sideration or recommendation and is directly or indirectly associated with interim management actions made after 1976 and prior to 1980. We request that BLM provide a map listing the activities that have occurred within the WSA since 1976. We also request information on the current status of reclamation. [Utah Wilderness Coalition]

**40.15 RESPONSE:** See above response to Specific Comment 40.14. BLM's Proposed Action for lands in the French Spring-Happy Canyon WSA is not influenced by any IMP activities, rather it results from the determination to allow for long-term tar sand extraction opportunities and designation of the area with the best wilderness values.

**40.16 COMMENT:** BLM has not acted to reclaim or take legal action on a trespass that occurred when a mining operator, Cotter Corporation, bladed more than 50 miles of roads and trails in the area between 1976 and 1980. No actual vehicle routes exist in the area with the exception of a road on Sam's Mesa which could be cherry-stemmed. BLM is excluding this area from wilderness recommendation. [Utah Wilderness Coalition]

**40.16 RESPONSE:** This activity occurred before the inventory and IMP policies were established. When inventoried, the area did not meet the definition of wilderness. See the response to General Comment 3.1.

**40.17 COMMENT:** All of these dry, barren spaces, affording access and views into the Dirty Devil Canyon, should be included in a comprehensive all-in-one wilderness area. It would be managed quite a bit more easily than the three separate topographic entities (French Spring-Happy Canyon and Fiddler Butte) represented in BLM's proposal. By carving up these geographic areas into smaller and more irregular shaped units, the qualities inherent in the wilderness are minimized. How small can we carry the lines along cliff and slope-break and still call it a wilderness . . . ? In these examples along the Dirty Devil River, BLM has gone a long way in promoting this concept. Please put the entire acreage in the wilderness proposals for these two WSAs (French Spring-Happy Canyon and Fiddler Butte). [Bruce Chesler]

**40.17 RESPONSE:** Intrusions identified during the inventory precludes wilderness consideration for lands between the two WSAs. Also, there are variations in wilderness qualities and in potential conflicts

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

with other resources. Portions of both WSAs are included in the BLM Proposed Action for the Final EIS; however, in some locations other resources are given preference as summarized in Appendix 11 in Volume I.

**40.18 COMMENT:** Has BLM spent adequate time on the ground in these places . . . or are agency decisions being mandated by energy interests!? [Bruce Chesler]

**40.18 RESPONSE:** BLM personnel spend considerable time on the ground and visit each WSA at least once a month during periods when the areas are accessible to the public. Visits are made on the ground or by air to monitor protection of wilderness values under IMP. Also, see the response to General Comment 2.18.

**40.19 COMMENT:** Unfortunately, what happened with the Dirty Devil did not with French Spring-Happy Canyon. The area is an extension of the Dirty Devil WSA with only a dirt road separating them. The wilderness quality is comparable to that of the Dirty Devil. According to BLM, the economic constraints of extraction and processing make development unlikely and potential for other minerals is low. These conflicts are not significant enough to recommend no wilderness. [Dean Petaja]

**40.19 RESPONSE:** The potential for extraction of bitumen from tar sand is low in the short term; however, the opportunities may exist for substantial development in the long term. See the responses to Specific Comments 38.9, 38.17, 38.19, and General Comment 15.54. The French Spring-Happy Canyon WSA has a significant tar sand resource while the Dirty Devil WSA has none.

**40.20 COMMENT:** BLM concludes that tar sand development is highly unlikely to occur because of economic constraints and environmental limitations. Yet, they propose deleting this area from designation due to this unlikely development potential. [Utah Wilderness Coalition]

**40.20 RESPONSE:** See the response to Specific Comment 40.19.

**40.21 COMMENT:** BLM recommends designation of 11,110 acres of the 25,000-acre wilderness study area. BLM does not justify this alternative in the Draft EIS. BLM here uses an arbitrary rating system, in violation of the wilderness study policy, to choose

"the most outstanding wilderness." [Utah Wilderness Coalition]

**40.21 RESPONSE:** The phrase "the most outstanding wilderness" has been changed to read, ". . . having the best wilderness values, BLM believes that wilderness values are of a higher quality in areas where outstanding opportunities for solitude and or primitive recreation exist, preferably in combination with special features." An arbitrary rating system was not used. See the responses to General Comments 3.36 and 8.11.

**40.22 COMMENT:** In the Proposed Action, BLM said that they deleted areas with low wilderness quality. We disagree about this arbitrary judgment. [Utah Wilderness Coalition]

**40.22 RESPONSE:** See the responses to Specific Comment 40.21 and General Comment 8.6.

**40.23 COMMENT:** BLM's No Action recommendation is absurd and unsupportable. The obvious reason for the No Action/No Wilderness recommendation is the presence of tar sand. These deposits are not economical to recover and any attempt at recovery would create unacceptable environmental destruction. This speculative tar sand resource should not be used to eliminate this WSA from wilderness recommendation. [Owen Severance]

**40.23 RESPONSE:** BLM's Proposed Action for the Final EIS is the Partial Wilderness Alternative. See the response to Specific Comment 40.19.

**40.24 COMMENT:** The Draft EIS analysis of the WSA's mineral potential does not justify the No Wilderness recommendation. The Draft EIS states, "likelihood of development is low" and "the loss of development opportunity would not be significant." Why then have mineral resources been used to recommend no wilderness and how does this correspond with the stated objective in Volume I of recommending those areas with minimal conflicts even if they have low wilderness values? The Draft EIS recognized the tar sand will likely never be developed in the WSA and given the extreme economic, environmental, and political constraints on development, that conclusion has to be assumed accurate. The analysis simply doesn't back up a no wilderness proposal. Furthermore, the Draft EIS states that with the exception of tar sand, "There are no known deposits of leasable minerals in the WSA," and none of the claims for locatable

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

minerals are "likely to be determined valid." [Utah Wilderness Association]

**40.24 RESPONSE:** Based on current information, the WSA contains known deposits of tar sand, is moderately favorable for oil and gas accumulations, has a moderate to high potential for uranium resources, and low to moderate potential for copper resources. Whether or not individual mining claims may be considered valid has no bearing on the mineral potential of the WSA as a whole. See the responses to General Comments 3.5 and 8.4. The objective in Volume I relative to minimal conflicts has been revised and clarified. Also, see the response to Specific Comment 40.23.

**40.25 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the claims in the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the early proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**40.25 RESPONSE:** See the response to Specific Comment 36.13.

**40.26 COMMENT:** BLM is required by law to use the worst-case analysis. Instead, BLM uses best-case analysis. BLM should describe on a map the best estimate of development for mineral production including roads, powerlines, water pipelines, waste disposal areas, and other facilities. BLM should judge from current information and areas that these plants are likely to occur and present this in the Draft EIS. BLM then needs to analyze the worst-case impacts on sensitive plant species. [Utah Wilderness Coalition]

**40.26 RESPONSE:** BLM no longer is required to perform worst-case analysis. This is made clear in 40 CFR 1502.22. However, it is policy that BLM analyze the reasonably foreseeable developments as well as all reasonable alternatives. See the response to General Comment 9.4. Listed special status threatened or

endangered plant species are not known to exist in the French Spring-Happy Canyon WSA.

**40.27 COMMENT:** Development of the tar sand on the Orange Cliffs would exceed air quality standards in the National Park and the French Spring-Happy Canyon area. The EIS needs to analyze whether tar sand development would exceed air and water quality restrictions. BLM needs to explain the environmental limitations on development in this area. BLM has assumed that none of these limitations are present in predicting the amount and kind of development possible in the area. This falsely raises the hopes for development and does not show the lands where development is infeasible either because of resource limitation or the need for natural resource protection. [Utah Wilderness Coalition]

**40.27 RESPONSE:** See the responses to Specific Comments 38.9, 39.13, and General Comments 15.2 and 15.41.

**40.28 COMMENT:** It is unacceptable that air quality and visibility would be degraded for 130 to 160 years in this WSA, or near Canyonlands National Park or Glen Canyon NRA. Tar sand development should not be allowed in Fiddler Butte WSA, nor in French Spring-Happy Canyon or Dirty Devil WSAs, or any area in or adjacent to Glen Canyon NRA or Canyonlands NP. [Tim Graham]

**40.28 RESPONSE:** See the response to Specific Comment 38.9.

**40.29 COMMENT:** The air quality impacts of the Proposed Action relate to PSD requirements. The Final EIS needs to explain more thoroughly the policy options and environmental consequences of designation of BLM wilderness areas as Class I. Furthermore, any proposed (or already excluded) area may already be precluded in full or in part from certain resource development because of the potential for that development to exceed PSD increments in current or potential Class I areas. The following example illustrates this point. Tar sand development is listed as a medium or high potential in three WSAs; Fiddler Butte, Horseshoe Canyon (South), and French Spring-Happy Canyon, all part of the Tar Sand Triangle. The development of tar sand resources within the Tar Sand Triangle is constrained by the adjacent Class I air quality designations. Accordingly, EPA concluded in 1984 in its review of the Tar Sand Triangle Draft EIS that the environmental impact of tar sand devel-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

opment would be environmentally unsatisfactory unless more stringent air quality control measures or appropriate reduction in development levels were pursued. EPA suggests that further consideration be given to the likelihood of such development and possibly allow these WSAs to be considered in the Proposed Action. [U.S. Environmental Protection Agency]

**40.29 RESPONSE:** See the response to Specific Comment 39.13.

**40.30 COMMENT:** Describe the vegetation which makes up each vegetation type. [Kim Jennyson]

**40.30 RESPONSE:** See the responses to General Comment 13.8 and Specific Comment 38.10.

**40.31 COMMENT:** No information on any sensitive or endangered plant inventory is given in the Draft EIS. BLM needs to list all inventories that have been performed for sensitive, threatened, or endangered plants and animals within the wilderness study area and adjacent areas left out. BLM needs to show on a map which areas have been inventoried and which have not. [Utah Wilderness Coalition]

**40.31 RESPONSE:** A specific inventory for threatened and endangered plant species was not conducted for each WSA area. However, during the 1980 Soil Vegetation Inventory, threatened or endangered plant species were noted when observed. A contract to inventory Sclerocactus wrightii and other sensitive plants was completed. The report is available in the BLM Richfield District Office. No threatened or endangered plants have been located in the French Spring-Happy Canyon WSA. Also, see the response to General Comment 13.8.

**40.32 COMMENT:** Under vegetation, no mention was made of the groves of Pseudotsuga menziesii (Douglas fir) found within the WSA in upper French Spring Fork. Douglas fir is very uncommon for this arid area and should have been mentioned in the Draft EIS. Currently, Glen Canyon NRA is looking at nearby groves of Douglas fir to be put into a special vegetation area. BLM should do the same for the French Spring Fork groves by designating the WSA as wilderness. No mention was made of several Astragalus species on the sensitive plant list that are known to occur very close to the WSA in like habitats. Because of the moist conditions found in upper French Spring Fork, it is possible that other sensitive and rare plants occur in the WSA. [Steven Spickerman]

**40.32 RESPONSE:** Although Douglas fir may be uncommon in arid areas, it is not Federally listed as threatened or endangered. It is now mentioned in the text as an usual ecological occurrence. The presence of an ecological special feature does not automatically qualify the area for wilderness designation. There are no known threatened or endangered plant species in the French Spring area.

Clearances are required prior to any disturbance being allowed on public land. These clearances are conducted regardless of the area's status relative to wilderness values. Plant species outside the WSA do not pertain to the content and analysis in the document unless there is reason to predict that the plants are trending into the WSA.

**40.33 COMMENT:** The Draft EIS does not take into consideration the water salinity problem on the San Rafael, Muddy, and Price Rivers and it further does not indicate how this problem will be dealt with if wilderness is designated on these streams. Because these bodies of water and tributaries are major contributors to the Colorado River salinity problem and because the Bureau of Reclamation has been given the charge of solving the salinity problem and because the *Sierra Club v. Block* decision regarding a Federal reserve water right may have a major impact on what can be done, there should be no wilderness recommendation made nor should there be any wilderness designated until these issues are addressed and resolved favorably to Emery County. [Emery County]

**40.33 RESPONSE:** See the response to Specific Comment 38.12.

**40.34 COMMENT:** Water is more available than is indicated. Besides the spring, which flows for some distance and supports a lush riparian area in French Spring Canyon, there is spotty but reliable water in the bottom of Happy Canyon which is perennial enough to support aquatic vegetation such as cattails. [Michael Van Note]

**40.34 RESPONSE:** There are small seeps in the Happy Canyon area. They have been noted in the Final EIS.

**40.35 COMMENT:** BLM needs to consider the same points made in the Tar Sand Triangle Draft EIS in this EIS. The issues needing consideration are the availability of water, waste water treatment, groundwater protection, wildlife habitat, visual resources, soil erosion, archaeology sites, salinity control, and air



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

quality. The Tar Sand Triangle Draft EIS developed a map showing areas where development could not occur. These maps show lands that abut this WSA. The same criteria should be applied to this area. [Utah Wilderness Coalition]

**40.35 RESPONSE:** The material in the Tar Sand Triangle Lease Conversion EIS (NPS, 1984) and the Regional Tar Sand Leasing EIS (BLM 1984) is incorporated by reference. There is no need to repeat all of it in the Wilderness EIS. The Wilderness EIS does state that, in the long term, wilderness values would be lost or severely degraded in the French Spring-Happy Canyon WSA should the No Action/No Wilderness Alternative be chosen and should tar sand be developed. The full detail is referenced. For the purpose of wilderness analysis, as allowed by the CEQ, guidelines for implementation of the National Environmental Policy Act (NEPA, 1969).

**40.36 COMMENT:** In considering BLM's Proposed Action, their own inconsistency must be weighed. While keeping the French Spring-Happy Canyon WSA pared down in favor of tar sand, BLM nonetheless supports the All Wilderness Alternative for the Dirty Devil WSA (#38). The Dirty Devil River, it should be noted, would be the source via pumps and pipes for the enormous volumes of water needed for the steam injection and refining steps of the tar sands. [Davis Lawrence]

**40.36 RESPONSE:** See the response to Specific Comment 38.6.

**40.37 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The northeast portion of Garfield County and the eastern portions of Wayne and Emery Counties, WSA areas, including French Spring-Happy Canyon, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic and Mesozoic age rocks. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**40.37 RESPONSE:** See the responses to General Comments 15.1, 15.2 and 15.19.

**40.38 COMMENT:** The Proposed Actions for the Dirty Devil, Horseshoe Canyon (South), French Spring-

Happy Canyon, and Fiddler Butte WSAs may preclude an informed decision on whether to convert existing oil and gas leases to combined hydrocarbon leases in the Tar Sand Triangle Special Tar Sand Area. The Draft EIS for the Tar Sand Triangle did not identify a preferred alternative; neither has a preferred alternative been approved nor the Final EIS been completed. Since a preferred alternative has not been chosen by the Department for the Tar Sand Triangle, much less a decision made on whether to convert the leases, a decision should not be made on implementing or recommending a decision on wilderness for these areas until the lease conversion decision is made. [National Park Service]

**40.38 RESPONSE:** See the responses to Specific Comments 38.9 and 38.17.

**40.39 COMMENT:** I adamantly oppose BLM's plan to allow tar sand development along the top of the Orange Cliffs. This incredibly inefficient method of oil extraction would destroy the wilderness character not only of the Dirty Devil Canyon system, but of adjacent Glen Canyon National Recreation Area and Canyonlands National Park lands as well. I specifically endorse wilderness designation for the important components of the Dirty Devil Canyon system. [Barry Lonik]

**40.39 RESPONSE:** See the response to Specific Comment 38.17.

**40.40 COMMENT:** The tar sand ratings are wrong. [State of Utah, et al.]

a. The tar sand resource figures are based on old reconnaissance investigations. A more recent Utah Geological and Mineral Survey resource study resulted in a downward revision of the deposit size. Figuring an average net pay of 100 feet and an average yield of 4 gallons of bitumen per ton, there are roughly 779 million tons of bitumen in the White Rim sandstone within the WSA. The Cedar Mesa and Moenkopi tar sand resources in the WSA together probably do not exceed 1 million barrels of bitumen. The tar sand resource in this WSA, if recovered, will be by in-situ methods rather than mining.

b. The 10-13 billion barrel tar sand estimate does not agree with the f4 rating which should only apply to deposits greater than 500 billion barrels.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

**40.40 RESPONSE:** The 500 billion barrels of oil referenced in the EIS for an f4 tar sand rating was in error and should have read 500 million barrels of oil. Based on new information concerning the tar sand resource, approximately 503 million barrels of oil may underlie the French Spring-Happy Canyon WSA (see Mineral and Energy Resources section of EIS). This corresponds to the f4 rating developed by SAI (more than 500 million barrels of oil in place).

**40.41 COMMENT:** The primary reason given for the French Spring-Happy Canyon WSA being dropped from consideration for wilderness is it lies within the Tar Sand Triangle. After studying the EIS on combined hydrocarbons and factors dealing with development of tar sand, it quickly becomes evident that this reason is not a valid one. Tar sand development is not technologically or economically feasible at this time, nor will be in the foreseeable future. Even the Draft EIS states, "The potential for mineral resources in this WSA is low . . ." (page 14, Draft EIS, Utah BLM Wilderness) and on page 15, "None of the leases show evidence of commercial quantities . . ." Yet mineral potential is given as the reason for keeping this WSA from being designated as wilderness. [Steven Spickerman]

**40.41 RESPONSE:** The French Spring-Happy Canyon is not being dropped from consideration for wilderness. The Final EIS includes the Partial Wilderness Alternative as the BLM's Proposed Action. In the reference cited in the comment, the first entire reference reads, "The potential for mineral resources in the WSA is low to moderate mainly due to the generally unfavorable geologic environment." The second entire reference reads, "None of the leases show evidence of commercial quantities nor is any evidence expected prior to designation." The mineral resource potential of the WSA has been re-evaluated by BLM in light of new information (see the Mineral and Energy Resources section of EIS). Based upon this reevaluation, the French Spring-Happy Canyon WSA has a potential for small, scattered accumulations of oil and gas, a large tar sand deposit, and small deposits of uranium and copper. The fact that current leases in the WSA presently show no evidence of commercial quantities of leasable minerals does not indicate that the WSA has no potential for the occurrence of these minerals. BLM has not included all of the WSA in the Proposed Action because of the long-term potential for tar sand exploration and development.

**40.42 COMMENT:** The Draft EIS proposal for this area, however, would leave out 20 miles of the river itself! It would also delete well over 100,000 acres of adjacent spectacularly wild lands that meet all of the qualifications for wilderness designation. These areas are being deleted in order to proceed with another federally subsidized boondoggle--tar sand development. The Tar Sand Triangle sits directly in the middle of this extraordinary wilderness. I am thoroughly, completely, and adamantly opposed to the commercial development of tar sand in this area. First of all, the development of the tar sand is commercially unfeasible. Oil produced from tar sand would be five or six times more expensive than the current price of oil. The only reason any companies are even mildly interested in involvement in this project is that they are being offered massive subsidies by the Federal government! I could make money and provide jobs selling regular sand if Washington would pay me a huge subsidy!! In a time when our government is cutting back on basic services, I am outraged that this type of wasteful boondoggle is even being considered. The economic problems associated with tar sand development are the least of my worries though. The environmental problems outlined in your agency's Tar Sand Triangle Draft EIS make for horrifying reading. The entire area would be completely and irrevocably destroyed. The process for extracting oil from the tar sand would cause "extensive subsurface fracturing over 38,790 acres . . . resulting in subsidence and rockfalls . . . 50 million cubic yards of soils moved . . . 30,000 acres of soil disturbed . . . cryptogamic soil crusts destroyed . . . aquifers disrupted . . . 14,335 acres totally cleared of vegetation . . . adverse effects on visibility . . . noise levels high enough to cause hearing impairment . . . a minimum of 2,000 archeological sites affected. The uneconomic nature of the "product" and the remoteness from any conceivable processing plants would make it necessary to process the crude heavy oil on-site, otherwise the costs of development would be 15 or 20 times the price of regular oil!!! This would entail the construction of five steam generation plants, cooking and sulphur recovery plants, a sewage plant, oil storage tanks, solid waste storage tanks and hauling facilities (for 800 cubic yards per day), a 130 million gallon reservoir, a pumping station on the Dirty Devil River, and hundreds of miles of new blacktopped roads into pristine wilderness. This would be a major industrial facility that would, according to your Tar Sand Draft EIS, produce so much noxious pollution that it would violate virtually every air pollution ordinance on the books! Pollution and noise from this

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

facility would severely impact the Glen Canyon Recreation Area and Canyonlands National Park directly to the east. Enough is enough! Who in their right mind would support a project that would destroy the economic value of major tourist attractions, permanently destroy a pristine and beautiful wilderness area, affect the ambient air quality of the entire Colorado Plateau, and not even be economically profitable without hundreds of millions of taxpayers dollars as subsidies. This proposal is destructive and positively deranged. I vehemently oppose the further study of this project and urge you to "nip it in the bud" by designating wilderness. [Scott DeLong]

**40.42 RESPONSE:** See the responses to General Comments 8.14, 15.41, and Specific Comment 38.17.

**40.43 COMMENT:** Missing from the EIS is the impact of the development proposed to be allowed in the WSA. BLM maintains that it will need 11,000 acre-feet of water a year to develop a tar sand project which will bring several thousand ORV users into this area. The double standard is graphically shown in the analysis of the tar sand deposit. The amount of oil that can be produced even if development were highly likely is presented in the Draft EIS. The impacts of a development this size which would violate the air quality and visibility standards is not emphasized. The impacts to Utah's travel industry are ignored. If this development is infeasible as the document says, then there will not be any resource foregone with wilderness designation. [Utah Wilderness Coalition]

**40.43 RESPONSE:** See the responses to General Comment 15.41 and Specific Comment 40.35.

**40.44 COMMENT:** The presence of tar sand should not be used as rationale for not recommending wilderness. [Utah Wilderness Coalition, Michael Salamacha, et al.]

a. Is BLM so overly concerned with the conflicts of potential tar sand development in this WSA to the extent that they have concluded No Action/No Wilderness is the best measure? BLM has stated clearly that because of all the environmental stipulations, economic climate, and pure unfeasibility of the whole project the prospect of development is low. Why does the reality of the de facto wilderness take a back seat to the outlandish idea of tar sand development?

b. BLM needs to include only feasible mineral developments in the estimates to resources lost in wilderness designation. Feasible developments include

those which will have a reasonable chance of having commercial development. This includes the likelihood for a demand for the commodity, a realistic opportunity to make a profit from production, presence of adequate natural resources for development (water), consideration of the costs of production (transportation, environmental protection, processing), and natural limitations (air quality limitations). The Draft EIS fails to address the issue of feasibility of development in any analytical approach. BLM fails to give any probability of development occurring within a time period. The analysis should include the relative priority of this tar sand area to others and to resources other than tar sand to meeting the same needs. Information on the quality of the resource, the costs of extraction and processing relative to other sites and resources and relation to other alternatives to tar sand development, including energy conservation, is critical in determining the feasibility of development. The impact of the termination of the Synthetic Fuels Corporation on this industry also needs to be presented. Without this subsidy, there is no market for these expensive fuels.

BLM is wrong in saying that wilderness designation removes infeasible developments from production. Factors outside wilderness consideration prevent development. The resources foregone should only include feasible developments. In this wilderness study area, there are none.

c. BLM recommends that parts of French Spring-Happy Canyon and Fiddler Butte WSAs not be considered for wilderness designation, evidently in order to "avoid conflicts with potential tar sand development." This runs counter to BLM's own analysis that the "probability of development is low due topographic and economic constraints." Ritzma, in "Commercial Aspects of Utah's Oil-impregnated Sandstone Deposits" (1973), downgrades the Tar Sand Triangle deposits that underlie these two WSAs because "The area is exceedingly rugged and the deposit extends down-dip beneath an intricately dissected plateau. Access to exposed areas is difficult." The Bureau of Mines report (Glassett, 1976) concludes that "the deposit is quite lean," and states, "the relatively high sulfur content of the Tar Sand Triangle bitumen may be a significant deterrent to . . . development of this huge deposit." Its sulfur content is more than four times that of Uintah Basin deposits. The report goes on to say that "the arid climate in the Tar Sand Triangle area is a major problem . . . reclamation . . . will be difficult if reestablishment of the vegetation (now a Federal

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

requirement) is required. The remoteness of the Tar Sand Triangle from a market . . . is another serious problem. It would be quite costly to transport . . . and quite costly to build a large refinery . . . near Lake Powell. Despite the huge size of the deposit, the Bureau of Mines authors reported in a 1978 energy seminar that they rank the Tar Sand Triangle well behind the Sunnyside and Asphalt Ridge deposits in feasibility. The Draft EIS concedes that these WSAs can be exploited only by in-situ methods, if at all. Because there has been no commercial demonstration of the economic viability of in situ tar sand recovery, the "conflict" with development of this resource should be disregarded as nonexistent. The Draft EIS should be revised to delete reference to such conflicts and BLM should add the entire affected WSAs to their wilderness recommendation.

**40.44 RESPONSE:** Environmental restrictions and economic factors would be involved; however, in the long-term future, technology improvements and market conditions may contribute to feasible commercial recovery of bitumen from tar sand deposits. This long term, beyond the year 2020, is impossible to predict in detail. The EIS does address reasonable and feasible expectations for the short term, approximately the next 30 years. BLM's Proposed Action would keep future (albeit unknown) options open for tar sand activities in the most likely portions of the two WSAs. See the responses to General Comments 9.10, 15.20, 15.41, and Specific Comment 40.41. Also, see Appendix 6 in Volume I.

**40.45 COMMENT:** No mention is made of lizards, snakes, raptors, and small mammals. [Kim Jennyson]

**40.45 RESPONSE:** Refer to the response to Specific Comment 37.14.

**40.46 COMMENT:** The Draft EIS states that under the No Action/No Wilderness Alternative, Bell's vireo and golden eagles would avoid the disturbed areas but would not be adversely affected. Intuitively, a situation causing a population to avoid a previously used area would seem to have possible adverse effects on the population. Assertions to the contrary need to be supported by evidence. [Scott Mills]

**40.46 RESPONSE:** There are 25,000 acres within the French Spring-Happy Canyon WSA. In the short term, there are 9 acres of surface disturbance predicted to occur from mineral exploration in the WSA for the No Action/No Wilderness Alternative. This 9

acres, relative to the overall acreage, is considered insignificant unless it would be concentrated in key locations such as water sources or nesting areas. There is no evidence that the 9 acres that could be disturbed would be in such key habitat utilized by golden eagles or Bell's vireo. Any surface-disturbing activities would be subject to environmental stipulations designed to protect water sources, riparian areas, and special species of plants and animals.

**40.47 COMMENT:** This is some very spectacular and beautiful country. BLM has recognized this in the EIS yet has also stated that scenic sightseeing is of only average quality. This does not make sense given the beauty of the areas mesas, slickrock domes, and spectacular, colorful canyons. Contrary also to the EIS, is the fact that there are numerous pleasant campsites both above and below the canyon rims. [Michael Van Note]

**40.47 RESPONSE:** Fifteen primitive-type recreational opportunities were evaluated in this WSA. Scenic sight-seeing was considered average as it did not meet the criteria for "outstanding" as explained in the Glossary in Volume I, in comparison to surrounding scenic features. Camping was rated below average. There are many places to camp, however, that they are pleasant is a matter of opinion. Water, shade, and grassy areas are lacking in most locations; so under most criteria, the sites would be considered to be below average.

**40.48 COMMENT:** The French Spring-Happy Canyon WSA has exceptional scenery that can only be protected through wilderness designation as proposed by the Utah Wilderness Coalition. [Sierra Club, Cache Group]

**40.48 RESPONSE:** About 54 percent of the WSA has Class A scenic quality. Wilderness designation is not the only means to protect scenic values.

**40.49 COMMENT:** The EIS indicates that only one recreation activity (geological sightseeing) is of outstanding quality, and three activities (photography, scenic sightseeing, and dayhiking) are of average quality. I question BLM's derivation of such low values assigned to these activities. [Michael Salamacha]

**40.49 RESPONSE:** The evaluation of recreation activities is based on the professional judgment of recreation specialists and other field personnel. It is not uncommon for differences of opinion in such

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

subjective determinations. See the responses to General Comments 9.8, 21.6, and 21.12.

**40.50 COMMENT:** The Draft EIS and previous BLM decision on this area shows an outrageous bias against wilderness. The section under environmental consequences has a brief summary for recreation for two partial alternatives. The only consequence mentioned is the potential loss of ORV use. Added to this table should be: "With tar sand development, the WSA would not be used for primitive recreation because of degradation of primitive recreation values." BLM understates the future potential for wilderness activities. BLM ignores the opportunity for professional guide service and ignores the potential growth of hunting with the introduction of the bighorn sheep. Just as BLM has concocted future dollars from mineral leasing, BLM can more accurately estimate the future jobs and income from increased recreation use. By using more accurate values for recreation economy, a high economic return from wilderness can be seen. [Utah Wilderness Coalition]

**40.50 RESPONSE:** The table mentioned is a summary of environmental consequences. The text of the EIS clearly describes the loss of outstanding opportunities for primitive recreation that would occur with the No Action/No Wilderness Alternative. Wilderness designation would create impacts to potential mineral activities. The magnitude of impact on minerals has also been estimated. Bighorn sheep and bighorn sheep hunting are not dependent on wilderness designation. These activities can and do continue in areas which have not been designated wilderness. Benefits should not be attributed to wilderness designation but rather to the activity itself. For example, local mountain lion hunts have contributed to the economy in Hanksville, although the economic value for lion hunting is not known. Also, see the response to General Comments 21.6 and 24.8.

**40.51 COMMENT:** We have a special concern regarding naturalness protection of Twin Corral Flat. [Sierra Club, Cache Group]

**40.51 RESPONSE:** The EIS identifies that Twin Corral Flat would not be protected by wilderness and may be impacted by future activities with the No Action/No Wilderness Alternative and the Partial Wilderness Alternative.

**40.52 COMMENT:** The opportunities for solitude on the isolated fingers between Three Forks should be

considered outstanding due both to their isolation and to the presence of small mesas, domes, and other slickrock features, as well as stands of pinyon-juniper which offer screening. Having spent 3 days backpacking and hiking in Happy Canyon, I can say that one could easily spend 5 or 6 days here exploring the side canyons, looking for petrified wood, examining chipping sites and occasional petroglyphs, sightseeing, rockclimbing, etc. I would suggest that the opportunities for solitude and recreation of an outstanding nature are present throughout most of the WSA (the exception being Twin Corral Flat). For these reasons I feel that a Partial Wilderness Alternative including all of the WSA south of the northern rim of Happy Canyon and the French Fork, including the fingers to the east of threeforks, should be recommended. This recommendation should also include moving the southern boundary to the south rim of Happy Canyon proper and including those roadless portions of the unnamed fork to the south of the western part of the WSA. [Michael Van Note]

**40.52 RESPONSE:** The partial alternative suggested has been added to the EIS narrative in the section on Alternatives Considered and Eliminated From Detailed Study. Outstanding opportunities for solitude and primitive, unconfined recreation exist on 11,000 of the 25,000 acres in this WSA. BLM has determined that these outstanding opportunities are concentrated in the canyons and side canyons, rather than on the rims and fingers. The partial alternative suggested would not avoid conflicts with the tar sand resource. Also, it would include lands outside the WSA boundary determined during the inventory to lack wilderness characteristics.

**40.53 COMMENT:** BLM's assessment of opportunities for solitude and primitive recreation are wrong. [Kim Jennyson, Steven Spickerman, Sierra Club, Cache Group, and Utah Wilderness Association]

a. I do not agree with your assessments on solitude, camping and backpacking, and wildlife sightseeing. I've spent many days hiking and backpacking in the WSA and have never seen another person. The WSA offers excellent solitude, both on the canyon rims and in the canyon bottoms. Upper French Spring Fork with its diverse vegetation types (Douglas fir, Gambels Oak, Cottonwood, and riparian growth around seeps) offers excellent bird watching.

b. BLM fails to explain why the opportunities for solitude are inadequate on 14,000 acres. The unit is

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

so isolated and near no habitation that the entire area qualified for outstanding opportunities for solitude. Again, BLM confuses screening with isolation. The Draft EIS states that the mesas limit the recreational opportunities. Why? I believe dayhiking, backpacking, exploring, and photographing are all possible on the mesas. In the Special Features section it states "the WSA possesses exceptional scenic values" yet in the recreational section the scenic sightseeing is rated as average. The entire unit qualifies for outstanding opportunities for primitive recreation.

c. We disagree with BLM's finding that parts of this WSA contain no solitude or primitive outdoor recreation opportunities. The entire area has outstanding opportunities for primitive outdoor recreation and solitude within a natural setting that clearly outweigh any potential mineral extraction plans and values. In particular, we disagree that one cannot find solitude on the mesas of this WSA. These areas contribute to the overall solitude of this area by increasing the available acreage and protecting the canyons from outside sights and sounds.

d. The Draft EIS' claim that only half the unit has opportunities for solitude fails to consider the relationship of "size" to opportunities for solitude. It is hard to imagine one cannot find solitude throughout a 25,000-acre unit that is bordered by two WSAs (97,000 acres in size) and on a third side by roadless Park Service land in the Glen Canyon NRA. The Draft EIS also states the WSA receives only 20 visitors days a year. How can you not find solitude in an area that averages less than 1 visitor day a year per 1,000 acres? To claim French Spring-Happy Canyon WSA lacks outstanding opportunities for solitude is absurd. Solitude must be judged on reality--how the land is going to be used--and not on what happens if thousands of people converge on the area at once. Solitude can be protected by management of policies no matter how popular an area might become.

**40.53 RESPONSE:** Wilderness values of naturalness, and opportunities for solitude and primitive recreation were assessed according to criteria established in the BLM Wilderness Inventory Handbook and BLM Wilderness Study Policy. The Glossary in Chapter I explains what is meant by "solitude and primitive and unconfined outdoor recreation." A careful evaluation of the criteria shows that all acreage in the WSA does not meet the requirements. Factors influencing solitude may include size, natural screening, and the ability of the user to find a secluded spot. It is the combi-

nation of these factors which determines the overall solitude determination.

BLM has determined that 11,000 of the 25,000 acres in the WSA contain the mandatory characteristic of outstanding solitude. Fifteen recreational-type activities were reviewed. In many WSAs BLM recognizes that there is a difference between "solitude" and "outstanding solitude." Applying the concept of solitude to each of the WSAs has required individual judgment on the part of many different people involved in the wilderness study. In the case of French Spring-Happy Canyon, the interpretation and judgments were made which determined that every acre of the WSA is not outstanding for solitude.

See the responses to General Comments 22.3 and 22.5.

**40.54 COMMENT:** The French Spring-Happy Canyon WSA is an area of outstanding beauty. The side canyon route into the canyon system contains a large, cottonwood surrounded spring in pristine condition. In the inner gorge in the Moenkopi Formation there are five good seeps. Water turned out to be far more abundant in the main canyon than anticipated. The lower canyons are breathtakingly vast, with perfect solitude. The evening light transformed the fantastic cliffs of Wingate Sandstone into towering walls of crimson fire. In the upper portion of French Spring Canyon rear up groves of anamalous and huge Douglas fir trees. Many birds frequent the lush vegetation of the seeps found there. The mesa tops are rich in cultural resources, with numerous lithic scatter sites and open camps having been found there. The panoramas from the mesa tops are awesome providing marvelous views of the Henry Mountains, the Waterpocket Fold, Boulder and Thousand Lake Mountains, Factory Butte, and the San Rafael Swell. Surely this area deserves maximum protection. [Gary Cox]

**40.54 RESPONSE:** BLM evaluates the presence and quality of mandatory and optional wilderness values, manageability, and resource conflicts in determining whether or not to include an area in the Proposed Action for wilderness designation. Most of the items listed above are supplemental wilderness values which add to the wilderness attraction but which do not constitute the principal criteria or rationale for proposing wilderness designation. The values noted in the comment are presented in the text of the EIS. See the response to Specific Comment 40.53.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

**40.55 COMMENT:** The draft proposals for French Spring-Happy Canyon and Fiddler Butte were both compromised by their speculative potential for tar sand. While much of the acreage remains wild in character regardless of trails and ways resulting from resource exploration. A wilderness-quality experience can yet be found along and adjacent to such infrequently used roads amid the Red Benches and up Happy Canyon - no vehicles for miles to disturb the solitude. There is so little traffic on these desert routes, one begins to wonder how it is that recreational, screening, and solitude arguments can be raised against including portions of these WSAs from wilderness recommendation. [Bruce Chesler]

**40.55 RESPONSE:** Both of the wilderness mandatory characteristics of solitude and primitive recreational opportunities are present in parts of both WSAs. This is made clear in the EIS. For this reason, a partial area was recommended in both the Fiddler Butte and the French Spring-Happy Canyon WSAs. See the responses to Specific Comments 40.53 and 40.54.

**40.56 COMMENT:** The EIS says "the WSA possesses exceptional scenic values." The Draft EIS then proceeds to downgrade the wilderness qualities of the WSA to match BLM's Partial Wilderness Alternative. Even though "there are no sights and sounds adversely affecting opportunities for solitude" and "the large size of the WSA and low recreational use contribute to the opportunities present," well over half of the WSA is determined to have less than outstanding opportunities for solitude. Evidently a new (undefined) definition for outstanding solitude was used in Volume IV. I also disagree that there are less than outstanding opportunities for primitive recreation on that same land that is claimed to lack outstanding opportunities for solitude. Once again land with Class B scenic quality is improperly given a Class IV VRM classification. [Owen Severance]

**40.56 RESPONSE:** See the responses to Specific Comments 36.30, 40.49, and 40.53.

**40.57 COMMENT:** BLM deleted areas from wilderness recommendation using the topographic confinement criteria for solitude. BLM falsely finds that hundred-foot deep drainages which crisscross nearly 40,000 acres have "less than outstanding opportunities for solitude." BLM ignores the enormous panorama of natural cliffs, mesas, benches, and badlands and the isolation a visitor would find in this huge natural landscape. We request that BLM take a field trip

to the area, document any human impacts, and report this to the public. We have been to the area on an annual basis and still find very few human impacts within the entire drainage areas. Four hundred to 1,000-foot vertical cliffs prevent any roads from being constructed. [Utah Wilderness Coalition]

**40.57 RESPONSE:** See the response to Specific Comment 40.53. BLM field personnel have spent many weeks, with many field trips, to gather data and for study of this area. The information in the EIS reports the findings to the public, consistent with the requirements of the National Environmental Policy Act (NEPA).

**40.58 COMMENT:** The Draft EIS often appears hostile to this WSA, as shown by the comment on page one, "The WSA possesses tenuous wilderness potential and should not be designated." Statements like this appear to be personal opinion and clearly do not belong in such a document. In reality, this WSA offers some of the very best potential for solitude and a wilderness experience. Its close proximity to lands administered by the National Park Service and to other BLM Wilderness Study Areas make it ideal for wilderness designation. [Steven Spickerman]

**40.58 RESPONSE:** The comment about "tenuous wilderness potential" is, in fact, a personal opinion offered by a member of the public during the EIS scoping process. It was clearly presented as such in the Draft EIS. Also, many of the public comments received on the Draft EIS and responded to here in the Final EIS are "personal opinion." Public comments are a requirement of the NEPA process and do belong in the EIS.

**40.59 COMMENT:** Why did BLM change its Proposed Action Alternative? [Rudy Lukez and Owen Severance]

a. Can BLM explain why it changed the recommendation from the "Partial Wilderness Alternative" to "No Action/No Wilderness Alternative" after the Draft EIS was published?

b. I will never be convinced that the change from a "Proposed Action" of partial wilderness in Volume IV for both French Spring-Happy Canyon WSA and Mt. Pennell WSA to a No Action/No Wilderness "Proposed Action" in Volume I was merely a typographical or editing error. Since the "Proposed Action" labeling is consistent throughout both WSAs in Volume IV, it is obvious that these recommendations were changed at

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 40: FRENCH SPRING-HAPPY CANYON WSA (CONTINUED)**

the last minute for political reasons. BLM won't explain this change for obvious reasons. It is unfortunate that the public won't be able to see or comment on the future progress of the EIS until it is too late to help BLM see "the error of its ways."

**40.59 RESPONSE:** See the responses to General Comments 25.17, 25.18, and Specific Comment 40.4.

**40.60 COMMENT:** Map 3, showing the proposed Partial Wilderness Alternative, is inconsistent with the BLM Proposed Action Pocket Map which shows No Action/No Wilderness as the proposed alternative. According to the Federal Register Notice, the No Action Alternative is the Proposed Action. This map needs correction. [State of Utah]

**40.60 RESPONSE:** The maps have been redone and corrected. The Partial Wilderness Alternative is the Proposed Action.

**SECTION 41**  
**FIDDLER BUTTE WSA**

**41.1 COMMENT:** BLM has not totally corrected the inventory on this area. BLM dropped the side canyons of Poison Spring Canyon south of the boundary road. There are no impacts in this area. BLM used their judgmental discretion to argue that because of size, these canyons do not have outstanding opportunities for solitude or recreation. We disagree with the agency. The 1,000-foot deep canyons and side canyons completely isolate visitors and are highly scenic. Even if we accept BLM's argument, they committed a serious procedural error and violated the Inventory Policy. BLM is required to determine if an area has outstanding opportunities for solitude or wilderness activities somewhere in the unit. Every acre does not need to have outstanding opportunities to qualify. BLM correctly did find these qualities in the area. The boundary is not determined by the presence of wilderness-grade solitude or recreation. The boundary is determined by the imprints of man. The boundary is drawn to exclude significant impacts. IBLA specifically required BLM to draw the boundaries of the WSA in the Poison Springs Canyon and Cedar Point based upon human impacts. [Utah Wilderness Coalition]

**41.1 RESPONSE:** WSA boundaries were identified during the inventory phase to include those areas that contain mandatory wilderness criteria of outstanding

opportunities for solitude, naturalness, and primitive and unconfined recreation. See the response to General Comment 3.1.

**41.2 COMMENT:** An item of serious concern (which came to mind during my study and visit to the area) is with the location of WSA boundaries. Why was the Fiddler Butte WSA not connected to the Dirty Devil WSA? What's wrong with the Dirty Devil River and its canyon complex watershed being contiguously defined? Why was the Big Ridge omitted? [T. Young]

**41.2 RESPONSE:** The areas discussed in the comment were dropped in the inventory because they lacked wilderness character, and they are no longer part of the study process. Public input was obtained and considered during the inventory. See the response to General Comment 3.1.

**41.3 COMMENT:** It appears to me that a logical and manageable BLM wilderness should extend northward from the Glen Canyon NRA boundary (in Range 14 East) to include all of the WSAs originally described as Dirty Devil, Fiddler Butte, and French Spring-Happy Canyon, plus the undescribed, unincluded, but highly deserving territories in between (in Ranges 13, 14, and 15 of Townships 30 and 31 South), such as North and South Hatch Canyons, the Pinnacle, and the Big Ridge. And don't argue that there are too many unrestoreable developed intrusions. I've been there and will not accept that argument AT ALL! As I said at the hearing in Moab, the landing strip intrusion arguments are totally invalid. The South Fork of Happy Canyon "road" is no longer a road and should not be used as a boundary. The North Hatch Canyon "jeep trail" is just that - a trail, not a road, therefore not a boundary. Neither the jeep trail across The Big Ridge nor the landing strip there constitute unrestoreable intrusions. [T. Young]

**41.3 RESPONSE:** See the response to Specific Comment 41.2.

**41.4 COMMENT:** The proposed partial wilderness is not of sufficient size to protect important landforms of scenic or other interest such as the upper portions of Fiddler Cove Canyon, Fiddler Butte (from which the WSA derives its name), and other draws, canyons, mesas, etc. The ways which exist within the unit provide for easy hiking and will no doubt disappear as significant intrusions as natural reclamation and erosion take place. I believe that more open and less rugged country provides for contrast. This is



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 41: FIDDLER BUTTE WSA (CONTINUED)

particularly true for this WSA. The Block derives its significance, isolation, and uniqueness from the open basins surrounding it (and vice versa). Preserving the Block while allowing for future intrusions adjacent to it is the equivalent of preserving a beautiful vantage point from which to view the continuing destruction of nature. I suggest that this WSA be recommended for wilderness in its entirety. [Michael Van Note]

**41.4 RESPONSE:** The EIS describes four alternatives. Following the analysis of Fiddler Butte WSA, BLM proposed the partial wilderness which results in two separate areas. Both these areas are of sufficient size to meet the Wilderness Act criteria. Both areas have high wilderness qualities. The Proposed Action recognizes those qualities and it avoids a portion of the WSA most likely to have potential for long-term future tar sand development. The Partial Wilderness Alternative is a compromise between preservation and potential future development uses.

**41.5 COMMENT:** We support the Utah Wilderness Coalition's proposal for a 85,000-acre Fiddler Butte wilderness area. We thank BLM for its 32,700-acre proposal, but there are many additional acres beyond the 65,000-acre WSA boundary that are deserving of wilderness status. [Sierra Club, Cache Group]

**41.5 RESPONSE:** BLM's Proposed Action is for 32,700 acres of wilderness in the Fiddler Butte WSA (5,700 acres in the Block and 27,000 acres in the Stair Canyon area). Areas outside of the 73,100-acre WSA are no longer part of the wilderness study, as explained in the response to General Comment 3.1. Also, refer to Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action alternative.

**41.6 COMMENT:** The Draft EIS fails to consider an alternative proposed by the Utah Wilderness Coalition. The Coalition submitted detailed maps to BLM and offered information detailing the wilderness values within these area. BLM has no mention of this proposal in the Draft EIS. [Utah Wilderness Coalition]

**41.6 RESPONSE:** See the response to General Comment 3.7.

**41.7 COMMENT:** In the Fiddler Butte area, BLM failed to follow the guidelines for defining wilderness boundaries for WSAs. In the northwest part of the area, BLM excluded large sand dune areas, major

mesa tops, canyon tops, and all of the south side of Poison Spring Canyon. These areas met the naturalness criteria and contain outstanding wilderness values. This area makes a logical and legal extension of the wilderness area, including many critical values BLM has not considered.

The northwest boundary of the unit cuts off the tops of canyons and fails to include important natural values and sand dunes, as well the side canyons on the south side of Poison Spring Canyon. These lands were incorrectly deleted from the wilderness inventory and are not under wilderness study. [Utah Wilderness Coalition]

**41.7 RESPONSE:** The location of WSA boundaries was determined during a previous phase of wilderness planning. Public input was solicited and received at that time. See the response to General Comment 3.1.

**41.8 COMMENT:** All of these dry barren spaces, affording access and views into the Dirty Devil Canyon, should be included in a comprehensive all-in-one wilderness area. It would be managed quite a bit more easily than the three separate topographic entities represented in BLM's Fiddler Butte proposal (not even including the namesake Butte!). By carving up these geographic areas into smaller and more irregular shaped units, the qualities inherent in the wilderness are minimized. How small can we carry the lines along cliff and slope-break and still call it a wilderness . . . ? In these examples along the Dirty Devil River, BLM has gone a long way in promoting this concept. Please put the entire acreage in the wilderness proposals for these two areas (French Spring-Happy Canyon and Fiddler Butte). [Bruce Chesler]

**41.8 RESPONSE:** See the responses to Specific Comments 40.17 and 41.2.

**41.9 COMMENT:** BLM ignored information we provided which corrected a factual error in BLM's inventory of human impacts. An alleged road is shown going up Rock Canyon from Glen Canyon NRA to the southern part of the Red Benches. The Draft EIS states "BLM believes the road to be accurately drawn." BLM has no photographic evidence of the existence of the road described. We request that BLM provide documents that show when the alleged road was constructed, who constructed it, and the current state of this road. We have been to the area on an annual basis and still find no road within the drainage

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 41: FIDDLER BUTTE WSA (CONTINUED)

BLM claims. A 400 foot vertical cliff prevents any road from being constructed. BLM still misrepresents this issue. [Utah Wilderness Coalition]

**41.9 RESPONSE:** The road has been redrawn to place it in its proper location approximately 0.5 miles north of the location shown in the Draft EIS. BLM agrees that no road exists in the bottom of Rock Canyon.

**41.10 COMMENT:** Fiddler Butte WSA is considered to have moderate wilderness values and high conflicts when compared with other WSAs in the region. The 27,700-acre partial alternative eliminates or mitigates most of the potential conflicts with tar sand development. Further conflict may be avoided by changing the boundary line along Highway 95 so that it does not come down to the highway right of way. The resulting overall conflicts for this alternative are considered to be low. [State of Utah]

**41.10 RESPONSE:** See the responses to General Comments 4.3 and 4.4, and Specific Comment 41.4.

**41.11 COMMENT:** Under maximum development (commodity production), BLM maintains that 16,660 acres could receive surface disturbances. Even though these are highly unlikely to be developed, they form the key for BLM deletions. BLM needs to draft one alternative which only deletes the lands potentially affected by the infeasible development. Information on disturbance needs to be corrected and included in the EIS. BLM does not show the location of these potential disturbances. A map showing these should be shown for the maximum development alternative. This alternative needs to be considered in the EIS. [Utah Wilderness Coalition]

**41.11 RESPONSE:** The mineral assumptions and surface disturbance estimates have been revised for the Final EIS. In the short term, about 63 acres would be disturbed for the No Action/No Wilderness Alternative, while larger areas could be disturbed in the long term. This is further explained in the Final EIS description and analysis of alternatives for the Fiddler Butte WSA.

**41.12 COMMENT:** BLM needs to discuss the Commodity Production Alternative and how it applies to this area. It would appear that with the unlikely development of minerals, an All Wilderness recommendation would also be part of the Commodity Production Alternative. For the scenario mostly likely to

occur, the commodity production differences between the alternatives for minerals is zero. [Utah Wilderness Coalition]

**41.12 RESPONSE:** The Volume I Commodity Production Alternative includes the No Action/No Wilderness Alternative for the Fiddler Butte WSA since this would allow maximum opportunities for tar sand exploration and development in the long-term future.

**41.13 COMMENT:** The 11 alternatives defined in Volume I of the Draft EIS each have a brief definition of the criteria which BLM used to decide which lands belong in each alternative. It appears that BLM has not applied them consistently to the Fiddler Butte area. In the Proposed Action BLM said that they deleted areas with low wilderness quality. We disagree about this unfounded judgment of wilderness quality. But if we accept BLM's judgment, BLM still does not follow the alternative guidelines. The Red Benches and the benches south of the Block which have no conflicts are recommended as unsuitable. In this case BLM said this area meets the standard of lands qualifying for wilderness but has low wilderness quality and deleted the area from the proposal. BLM failed to apply this alternative's criteria to this area. We request that BLM correct the application of the alternative criteria. [Utah Wilderness Coalition]

**41.13 RESPONSE:** See the response to General Comment 3.5.

**41.14 COMMENT:** The Large Cluster Concept Alternative would include this area with the adjacent National Park lands, the Dirty Devil, and the Little Rockies. This alternative appears not to have been discussed for this area. While a table was prepared, there is no discussion of methods used to arrive at this table. We request an explanation of the application of the alternatives for each area. [Utah Wilderness Coalition]

**41.14 RESPONSE:** This WSA was not included in the Large Cluster Concept Alternative because it did not meet the criteria of 100,000 acres in size when combined with adjacent NPS-proposed wilderness in the Glen Canyon National Recreation Area. The Stair Canyon portion of the BLM Proposed Action would be adjacent to the NPS-proposed area. The Fiddler Butte WSA is not within a 0.5 mile of the Dirty Devil WSA or Little Rockies WSA. Additionally, a paved highway separates the Fiddler Butte WSA and the Little Rockies WSA. The methods used to arrive at the table

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

of WSAs included in the Large Cluster Concept Alternative are the criteria listed in Chapter 2 in Volume I.

**41.15 COMMENT:** Even though this area contains lands that BLM says have some of the highest possible wilderness values, BLM claims that this should not be part of the Paramount Wilderness Alternative. BLM has no explanation why this area does not qualify. Using BLM's record, Fiddler Butte, either part or all, seems to fit the description of this alternative. BLM failed to include any discussion of the application of this alternative to this area. [Utah Wilderness Coalition]

**41.15 RESPONSE:** The Dirty Devil WSA is included in the Paramount Wilderness Alternative in Volume I. It is considered to have somewhat higher wilderness qualities and fewer resource conflicts than Fiddler Butte WSA. The criteria for the alternative are given in Chapter 2 in Volume I.

**41.16 COMMENT:** We raised the issue of interim management problems in this WSA. We asked that BLM provide a full record of the location and condition of all activities that have occurred in this area since 1976. BLM incorrectly concludes: "No WSA acreage was excluded from suitability under this alternative due to post-FLPMA-related disturbances." Numerous activities occurred in areas BLM is excluding from recommendation. Clearly, BLM is not following published policy. Within this unit, a majority of the acreage deleted from wilderness recommendation is directly or indirectly associated with these interim management actions. BLM has failed to adequately address this issue. [Utah Wilderness Coalition]

Interim management is a significant issue affecting the wilderness suitability decisions. Many actions have not been reported publicly and are now being considered by BLM in making wilderness recommendation. We request a map of the WSA be produced with all actions since 1976. We further request that BLM give a written description of each action, its significance on wilderness values, and describe its current condition.

**41.16 RESPONSE:** BLM did not exclude from recommendation for wilderness designation any areas because of any IMP actions that occurred within WSA boundaries. Areas were not recommended for further wilderness consideration because they lack outstanding wilderness characteristics or because of potential resource conflicts. The naturalness discussion in the

Affected Environment section of the Final EIS details IMP actions and their affect in the naturalness of the WSA.

**41.17 COMMENT:** We requested that BLM publish in the Draft EIS a record of the actions BLM has allowed to occur since the start of the wilderness review in 1976. We argue that BLM has continued to allow actions in some cases without reclamation in parts of WSAs BLM recommends unsuitable for designation. Here are a few of the actions that BLM has allowed: [Utah Wilderness Coalition]

Action	BLM Response
Oil Well Exploration	Poison Canyon Rim area dropped from study.
Evergreen Oil Co., February 1981	Minimal reclamation required.
Uranium Exploration	Area dropped from wilderness study.
Poison Canyon Rim and Cedar Pt.	No reclamation performed.
Tar Sand Exploration by Kirkwood Oil, May 1980	Area dropped from wilderness study, appeal reinstated area, recommended by BLM as unsuitable, no reclamation.
NFS Hatch Canyon and Fiddler Butte mining trespass, Woodbury F. Adams, February 1981, Rock Canyon and South Red Benches	Area dropped from wilderness study, appeal reinstated area, now recommended unsuitable.
Construction of reservoirs funded by BLM, November 1982, south of The Block White Rim	Area dropped from wilderness study, appeal reinstated area recommended by BLM as unsuitable, no reclamation.
Uranium Exploration, July 1981, Fish-Watt Mining Co. in Poison Spring Canyon	Area dropped from wilderness study, no reclamation.

**41.17 RESPONSE:** See the response to Specific Comment 41.16.

**41.18 COMMENT:** During the inventory, BLM constructed two reservoirs within the lands under wilderness review without any record of following the Interim Management Policy. BLM plans on constructing eight more reservoirs within the current WSA. BLM plans to exclude the area where these projects were constructed or proposed from wilderness recommendation. [Utah Wilderness Coalition]

**41.18 RESPONSE:** BLM constructed two reservoirs within the Fiddler Butte WSA in FY 1982. An environmental analysis was completed for each with a finding of no significant impact. Range development

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 41: FIDDLER BUTTE WSA (CONTINUED)

projects are allowable in the Interim Management Policy and in the Wilderness Act. There are presently livestock reservoirs in many WSAs. BLM does not plan to construct eight new reservoirs in the proposed WSA. There are no plans to exclude areas as a result of the two projects.

**41.19 COMMENT:** BLM has not acted to reclaim or take legal action on a trespass that occurred when a mining operator bladed a reclaimed access route along the south lower benches of the Block to reach a mining claim in Section 36, Township 36 South, Range 15 East. BLM has shown an imaginary "cherry-stem" to link this claim site with the Flint Trail on the south. No actual vehicle route now exists. BLM is excluding this area from wilderness recommendation. [Utah Wilderness Coalition]

**41.19 RESPONSE:** The route was considered to be a road at the time of the wilderness inventory, therefore, it was shown as a cherry-stem and it is not within the WSA. Lands in the vicinity which are within the WSA are omitted from BLM Proposed Action because of low wilderness qualities. See Appendix 11 in Volume I.

**41.20 COMMENT:** Has BLM spent adequate time on the ground in these places or are agency decisions being mandated by energy interests!? [Bruce Chesler]

**41.20 RESPONSE:** See the response to Specific Comment 40.18.

**41.21 COMMENT:** BLM's Proposed Action will not be manageable. [Sierra Club, Cache Group; and Tim Graham]

a. We are very concerned about BLM's proposal to split this WSA into two distinct units. This will encourage numerous management problems. To best protect this area's nonmineral values, BLM should adopt a proposal such as the UWC's alternative, which will manage this area as one distinct unit. This also would be important for continuity with neighboring National Park Service lands.

b. This Draft EIS claims to try to provide manageable wilderness units, yet the Proposed Action for this WSA would yield two small units separated by a large area of potentially developed land. How is this the best managed alternative? The manageability alternative calls for designating the entire WSA indicating that that is the best management alternative.

The Proposed Action also would make management of Glen Canyon proposed wilderness more difficult for the same reasons.

**41.21 RESPONSE:** See the responses to Specific Comments 41.4 and 41.14. BLM believes that the two areas would be manageable. Since the western (Stair Canyon) portion of the Proposed Action is contiguous to the National Park Service recommended wilderness area, this would add continuity and size to that area. However, size is not limiting because both the proposed areas would be over the required 5,000 acres specified in the Wilderness Act and FLPMA.

**41.22 COMMENT:** The Block's entire landform should be protected. BLM's Draft EIS proposal does not provide adequate landform protection for this unique mesa country landform. [Sierra Club, Cache Group]

**41.22 RESPONSE:** The Block is contained within the BLM Proposed Action of 32,700 acres. Areas contiguous with the Block not recommended for wilderness do not have the outstanding wilderness characteristics and conflict with possible tar sand development.

**41.23 COMMENT:** BLM's recommendation for the Fiddler Butte WSA is simply bizarre, since it does not include the eponymous Butte itself. The "All Wilderness Alternative" is fully justified. [Anthony Williams]

**41.23 RESPONSE:** The fact that the WSA is named after Fiddler Butte does not necessarily mean that the butte has outstanding wilderness qualities and must be proposed for wilderness designation. It is anticipated that the two proposed areas would be renamed as "The Block" and "Stair Canyon" at the time of designation.

**41.24 COMMENT:** Most of the WSA that is not recommended for wilderness happens to be the portion with greatest tar sand development potential. Yet the rationale for dropping this parcel is ostensibly due to "less than outstanding opportunities for primitive recreation and solitude." Again, this is a very convenient coincidence, don't you think? It appears that in the Fiddler Butte WSA, the rather nebulous and subjective qualities of solitude and primitive recreation have been defined in such a way that they can be used as the public reasons for eliminating WSAs or parts thereof, while in fact, it is the mineral development,

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 41: FIDDLER BUTTE WSA (CONTINUED)

no matter how low, that actually dictates which areas are dropped and which are recommended. BLM should document statements that the quality of solitude and primitive recreation in this and other WSAs similarly treated is "less than outstanding." [Tim Graham]

**41.24 RESPONSE:** The rationale includes both the low wilderness qualities and the future potential for tar sand. See Appendix 11. The determination of outstanding solitude and primitive recreation is, in fact, based to a large extent on the judgment of BLM field personnel. See the response to Specific Comment 40.53.

**41.25 COMMENT:** BLM listed 24 specific scoping issues and responded to them in the Draft EIS. Some of the issues are considered, some partially, and others not. We request that these issues which are repeated from our scoping comments be considered in the EIS. We request that BLM describe why the issue is significant or not, how the issue was used in the analysis, and what decisions were affected by this issue. [Utah Wilderness Coalition]

**41.25 RESPONSE:** All scoping comments were responded to and considered. This does not necessarily mean that BLM agreed with all comments or that all comments resulted in issues. Issues were determined on the basis of the several interrelated factors, including the subject of the comment and its timeliness relative to the study process (i.e., focus on content of Draft EIS), the content of the comment (i.e., provides data or points out where corrections are needed), the accuracy of the comment (i.e., correct interpretation or misinterpretation of information), the usefulness of the comment (i.e., pertinent to decisions or extraneous), and the number and significance of the comments. Not all items identified as issues by separate commenters were used; rather issues for the EIS were synthesized from the overall public input and the actual resource conditions in the WSA. They have been used in the Final EIS to focus the impact analysis. See the responses to General Comments 2.5 and 9.3.

**41.26 COMMENT:** BLM is required by law to use the worst-case analysis. Instead, BLM uses best-case analysis. BLM should describe on a map the best estimate of development for mineral production including roads, powerlines, water pipelines, waste disposal areas, and other facilities. BLM should judge from current information the areas that these plants are likely

to occur and present this in the Draft EIS. BLM then needs to analyze the worst-case impacts to these species. [Utah Wilderness Coalition]

**41.26 RESPONSE:** See the response to Specific Comment 40.26.

**41.27 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the claims in the SSAs or the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the SSA proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**41.27 RESPONSE:** See the response to Specific Comment 36.13.

**41.28 COMMENT:** Each comment period sees BLM add more of this magnificent wilderness area to potential designation. Still much needs to be improved. Several significant issues and alternatives were not considered. The analysis needs to develop future wilderness benefits and recognize only feasible conflicts in making its recommendation. [Utah Wilderness Coalition]

**41.28 RESPONSE:** BLM's wilderness study process has been an ongoing effort, aided with public participation. The EIS describes and analyzes four alternatives for the Fiddler Butte WSA. Volume I of the EIS presents a reasonable range of Statewide alternatives, several of which include the Fiddler Butte WSA. The analysis for the WSA alternatives and for the Statewide alternatives reflects the significant issues, the wilderness benefits, and the potential conflicts with other uses. Also, see the response to General Comment 15.20.

**41.29 COMMENT:** It is unacceptable that air quality and visibility would be degraded for 130 to 160 years in this WSA, or near Canyonlands National Park (NP) or Glen Canyon NRA. Tar sand development should not be allowed in Fiddler Butte WSA, nor in

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

French Spring-Happy Canyon or Dirty Devil WSAs, or any area in or adjacent to Glen Canyon NRA or Canyonlands NP. [Tim Graham]

**41.29 RESPONSE:** See the responses to General Comments 7.1 and 10.4, and Specific Comment 38.9.

**41.30 COMMENT:** The air quality impacts of the Proposed Action relate to PSD requirements. The Final EIS needs to explain more thoroughly the policy options and environmental consequences of designation of BLM wilderness areas as Class I. Furthermore, any proposed (or already excluded) area may already be precluded in full or in part from certain resource development because of the potential for that development to exceed PSD increments in current or potential Class I areas. The following example illustrates this point: tar sand development is listed as a medium or high potential development in three WSAs; Fiddler Butte, Horseshoe Canyon (South), and French Spring-Happy Canyon, all part of the Tar Sand Triangle. The development of tar sand resources within the Tar Sand Triangle is constrained by the adjacent Class I air quality designations. Accordingly, EPA concluded in 1984 in its review of the Tar Sand Triangle Draft EIS that the environmental impact of tar sand development would be environmentally unsatisfactory unless more stringent air quality control measures or appropriate reduction in development levels were pursued. EPA suggests that further consideration be given to the likelihood of such development and possibly allow these WSAs to be considered in the Proposed Action. [U.S. Environmental Protection Agency]

**41.30 RESPONSE:** See the response to Specific Comment 39.13.

**41.31 COMMENT:** Development of the tar sand on the Orange Cliffs would exceed air quality standards in the National Park. It is likely that the Fiddler Butte area would also do so. The EIS needs to analyze whether tar sand development would exceed air and water quality restrictions. BLM needs to explain the environmental limitations on development in this area. BLM has assumed that none of these limitations are present in predicting the amount and kind of development possible in the area. This falsely raises the hopes for development and does not show the lands where development is infeasible either because of resource limitation or the need for natural resource protection. [Utah Wilderness Coalition]

**41.31 RESPONSE:** See the response to Specific Comment 39.13.

**41.32 COMMENT:** BLM maintains that the Bailey-Kuchler PNV map be used to show natural system diversity. The title alone states the purpose of this map. It only looks at the dominant large plant and ignores other plant species, wildlife, landform, and character. This is not a qualified tool for determining the natural diversity of an area. [Utah Wilderness Coalition]

**41.32 RESPONSE:** See the response to General Comment 13.7. Although the Bailey-Kuchler concept of ecosystem representation may be subjected to further refinement, it is the professionally adopted national standard used by the Forest Service and BLM (Davis, 1987).

**41.33 COMMENT:** No information on any inventory is given. BLM needs to list all inventories that have been performed for sensitive, threatened, or endangered plants and animals within the wilderness study area. BLM needs to show on a map which areas have been inventoried and which have not. [Utah Wilderness Coalition]

**41.33 RESPONSE:** Inventories for sensitive, threatened, or endangered plants and animals within the Fiddler Butte WSA have not been specially conducted for this EIS because such inventories were not critical to decisions of wilderness values. Existing resource information is considered to be sufficient for the EIS. See General Comment Responses 9.6, 13.1, and 13.8.

**41.34 COMMENT:** Water resources are extremely valuable in this arid land. Disruption of water sources (springs and ground water) in the WSA due to tar sand development would have an extremely adverse effect on wildlife. This aspect is not mentioned in the Draft EIS, only that springs could be disrupted, and as a separate impact, that wildlife habitat may be affected. The connection should be explicitly made in the Draft EIS. [Tim Graham]

**41.34 RESPONSE:** The interconnection between water and wildlife has been noted. Also, see the response to Specific Comment 40.35.

**41.35 COMMENT:** Our District is planning a three phase development using the water of the Fremont

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

River. The project is in the \$40 to \$50 million range and will provide approximately 500 full-time equivalent jobs Statewide. Some of the WSA's are particularly objectionable to us in view of possible conflicts with our project. These are not adequately addressed in the Draft EIS. The Dirty Devil River runs through the Fiddler Butte WSA. The Fremont River is the main tributary to the Dirty Devil River and our main water source for future growth. Much of our proposed lands lie on the benches west of the Dirty Devil WSA. A proposed water quality improvement project at Salt Wash is upstream of these WSAs. [Wayne County, Water Conservancy District]

**41.35 RESPONSE:** The EIS information and analysis for the Fiddler Butte WSA has been updated to reflect available information on potential water projects. In particular, see the information on water resources for the No Action/No Wilderness Alternative. Also, see the information on water resources and Federal reserve water rights in Volume I and the responses to General Comments 14.1 through 14.9.

**41.36 COMMENT:** The Draft EIS proposal for this area, however, would leave out 20 miles of the river itself! It would also delete well over 100,000 acres of adjacent spectacularly wild lands that meet all of the qualifications for wilderness designation. These areas are being deleted in order to proceed with another federally subsidized boondoggle--tar sand development. The Tar Sand Triangle sits directly in the middle of this extraordinary wilderness. I am thoroughly, completely, and adamantly opposed to the commercial development of tar sand in this area. First of all, the development of the tar sand is commercially unfeasible. Oil produced from tar sand would be five or six times more expensive than the current price of oil. The only reason any companies are even mildly interested in involvement in this project is that they are being offered massive subsidies by the Federal government! I could make money and provide jobs selling regular sand if Washington would pay me a huge subsidy!! In a time when our government is cutting back on basic services, I am outraged that this type of wasteful boondoggle is even being considered. The economic problems associated with tar sand development are the least of my worries though. The environmental problems outlined in your agency's Tar Sand Triangle Draft EIS make for horrifying reading. The entire area would be completely and irrevocably destroyed. The process for extracting oil from the tar sand would cause "extensive subsurface fracturing over 38,790 acres . . . resulting

in subsidence and rockfalls . . . 50 million cubic yards of soils moved . . . 30,000 acres of soil disturbed . . . cryptogamic soil crusts destroyed . . . aquifers disrupted . . . 14,335 acres totally cleared of vegetation . . . adverse effects on visibility . . . noise levels high enough to cause hearing impairment . . . a minimum of 2,000 archeological sites affected." The uneconomic nature of the "product" and the remoteness from any conceivable processing plants would make it necessary to process the crude heavy oil on-site, otherwise the costs of development would be 15 or 20 times the price of regular oil!!! This would entail the construction of five steam generation plants, cooking and sulphur recovery plants, a sewage plant, oil storage tanks, solid waste storage tanks and hauling facilities (for 800 cubic yards per day), a 130 million gallon reservoir, a pumping station on the Dirty Devil River, and hundreds of miles of new blacktopped roads into pristine wilderness. This would be a major industrial facility that would, according to your Tar Sand Draft EIS, produce so much noxious pollution that it would violate virtually every air pollution ordinance on the books! Pollution and noise from this facility would severely impact the Glen Canyon Recreation Area and Canyonlands National Park directly to the east. Enough is enough! Who in their right mind would support a project that would destroy the economic value of major tourist attractions, permanently destroy a pristine and beautiful wilderness area, affect the ambient air quality of the entire Colorado Plateau, and not even be economically profitable without hundreds of millions of taxpayers dollars as subsidies. This proposal is destructive and positively deranged. I vehemently oppose the further study of this project and urge you to "nip it in the bud" by designating wilderness. [Scott DeLong]

**41.36 RESPONSE:** See the responses to General Comments 8.14, 15.41, and Specific Comment 38.17.

**41.37 COMMENT:** The potential for tar sand development is too low to support this No Wilderness proposal. [Utah Wilderness Association and Utah Wilderness Coalition]

a. The lands excluded from the suitability recommendation have obviously been deleted because of the potential tar sand development. Yet this decision is not supported by the information contained in the Draft EIS, particularly the recognition that tar sand development is unlikely to ever occur. The Draft EIS state the "likelihood of development opportunity

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

would not be significant." Why then has this unlikely development driven BLM's recommendation? In the same light, why has Fiddler Butte WSA received an (f3) rating for uranium when the Draft EIS states, "There are no known commercial deposits of locatable minerals in the WSA"? The recommendation should be based on the best information and on reality, and in this instance, reality is that development will not occur and the area deserves wilderness protection.

b. BLM needs to include only feasible mineral developments in the estimates of resources lost in wilderness designation. Feasible developments include those which will have a reasonable chance of having commercial development. This includes the likelihood for a demand for the commodity, a realistic opportunity to make a profit from production, presence of adequate natural resource for development (water), consideration of the costs of production (transportation, environmental protection, processing), and natural limitations (air and water quality limitations). The Draft EIS fails to address the issue of feasibility of development in any analytical approach. BLM fails to give any numerical probability of development occurring within a time period. The analysis should include the relative priority of this tar sand area to others and to resources other than tar sand to meeting the same needs. Information on the quality of the resource and the costs of extraction and processing relative to other sites and resources is critical in determining the feasibility of development. The impact of the termination of the Synfuels Corporation on this industry also needs to be presented. Without this subsidy, there is no market for these expensive fuels.

BLM is mistaken in saying that wilderness designation removes infeasible developments from production. Factors outside wilderness consideration prevent development. The resources foregone should only include feasible developments. In this wilderness study area there are none.

c. BLM recommends that two parts of these WSAs not be considered for wilderness designation, evidently in order to "avoid conflicts with potential tar sand development." This runs counter to BLM's own analysis that the "probability of development is low due to topographic and economic constraints." Ritzma, in "Commercial Aspects of Utah's Oil-impregnated Sandstone Deposits" (1973), downgrades the Tar Sand Triangle deposits that underlie these two WSAs because, "The area is exceedingly rugged and the deposit extends downdip beneath an intricately dissected pla-

teau. Access to exposed areas is difficult." The Bureau of Mines report (Glassett, 1976) concludes that "the deposit is quite lean," and states, "the relatively high sulfur content of the Tar Sand Triangle bitumen may be a significant deterrent to . . . development of this huge deposit." Its sulfur content is more than four times that of Uintah Basin deposits. The report goes on to say, "The arid climate in the Tar Sand Triangle area is a major problem . . . reclamation . . . will be difficult if reestablishment of the vegetation (now a Federal requirement) is required. The remoteness of the Tar Sand Triangle from a market . . . is another serious problem. It would be quite costly to transport . . . and quite costly to build a large refinery . . . near Lake Powell. Despite the huge size of the deposit, the Bureau of Mines authors reported in a 1978 energy seminar that they rank the Tar Sand Triangle well behind the Sunnyside and Asphalt Ridge deposits in feasibility. The Draft EIS concedes that these WSAs can be exploited only by in-situ methods, if at all. Because there has been no commercial demonstration of the economic viability of in-situ tar sand recovery, the "conflict" with development of this resource should be disregarded as nonexistent. The Draft EIS should be revised to delete reference to such conflicts and BLM should add the entire affected WSAs to their wilderness recommendation.

**41.37 RESPONSE:** The mineral resource potential of the Fiddler Butte WSA has been re-evaluated by BLM in light of new information (see the Mineral and Energy Resources section of EIS). Based on this re-evaluation, the Fiddler Butte WSA has a potential for small, scattered accumulations of oil and gas, a moderate to large tar sand deposit in the eastern portion, and small deposits of uranium and copper. The fact that current leases in the WSA presently show no evidence of commercial production does not indicate that the WSA has no potential for the occurrence of these minerals. BLM has not included all of the WSA in the Proposed Action because of the long-term potential for tar sand exploration and development. See the responses to Specific Comments 41.24 and 41.28.

**41.38 COMMENT:** BLM needs to consider the same points made in the Tar Sand Triangle Draft EIS in this EIS. The issues needing consideration are the availability of water, waste water treatment, groundwater protection, wildlife habitat, visual resources, soil erosion, archaeology sites, salinity control, and air quality. The Tar Sand Triangle Draft EIS developed a map showing areas where development could not occur. These maps show lands that abut this WSA.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

The same criteria should be applied to this area and a map produced which shows which lands would be affected by development. [Utah Wilderness Coalition]

**41.38 RESPONSE:** See the responses to General Comment 15.53 and Specific Comment 40.35.

**41.39 COMMENT:** Missing from the EIS is the impact of the development proposed to be allowed in the WSA. BLM maintains that it will need 11,000-acre feet of water a year to develop a tar sand project which will bring several thousand ORV users into this area. The double standard is graphically shown in the analysis of the tar sand deposit. The amount of oil that can be produced even though development is highly likely is presented in the Draft EIS. The impacts of a development this size which would violate the air quality and visibility standards is not emphasized. The impacts to Utah's travel industry are ignored. If this development is infeasible as the document says, then there will not be any resource foregone with wilderness designation. [Utah Wilderness Coalition]

**41.39 RESPONSE:** See the response to Specific Comment 40.35.

**41.40 COMMENT:** The oil and gas data are incomplete. [Texaco, Inc., and Bureau of Mines]

a. The hydrocarbon data are lacking. Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The northeast portion of Garfield County and the eastern portions of Wayne and Emery Counties, including the Fiddler Butte WSA, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic and Mesozoic age rocks. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas.

b. No petroleum wells are reported in the WSA (DEIS p. 19, Volume IV). Our minerals investigation indicates that Superior Oil Company drilled and abandoned a well in T. 31 S., R. 13 E., sec. 8. The well appears to be inside of the "All Wilderness Alternative" boundary. Three wells were suspended in T. 31 S., R. 15 E. Additional wells have been drilled north and west of the WSA. Oil and gas shows were found in two wells located in T. 31 S., R. 15 E. The Draft EIS does not discuss any of this drilling activity.

**41.40 RESPONSE:** See the response to Specific Comment 39.16. Additional information on drilling and oil and gas shows has been included in the Final EIS.

**41.41 COMMENT:** I adamantly oppose BLM's plan to allow tar sand development along the top of the Orange Cliffs. This incredibly inefficient method of oil extraction would destroy the wilderness character not only of the Dirty Devil Canyon system, but of adjacent Glen Canyon NRA and Canyonlands National Park lands as well. I specifically endorse wilderness designation for the important components of the Dirty Devil Canyon system. [Barry Lonik]

**41.41 RESPONSE:** See the response to Specific Comment 38.17.

**41.42 COMMENT:** The Draft EIS cites Ritzma (1979) as saying that 10 to 20 percent of bitumen can be recovered by in-situ methods of extraction, yet in the Fiddler Butte analysis, the Draft EIS uses an in-situ recovery factor of 30 percent to estimate recoverable reserves of hydrocarbon of 960 million bbl to 1,260 million bbl. In the Table 5 summary for the Fiddler Butte WSA, a figure of more than 500 billion bbl is cited. The Fiddler Butte analysis is only one of many examples in the Draft EIS where tar sand resources have been overstated. BLM should apply reasonable criteria in a consistent manner throughout the Draft EIS when estimating hydrocarbon potential of tar sand deposits. Furthermore, in-situ methods have not been shown to be economically viable through actual commercial application. The Draft EIS does state in many individual area analyses (Fiddler Butte and North Escalante Canyon, for example) that tar sand development is unlikely, yet BLM inexplicably excludes parts of these areas from its wilderness recommendation, evidently on the basis of future tar sand development. Such areas should be made part of BLM's wilderness recommendation absent compelling reason to exclude them. [Utah Wilderness Coalition]

**41.42 RESPONSE:** Authorities differ on the predicted recovery ratios for in-situ tar sand processes. These range from a low of 10 percent to a high of 80 percent, depending on topography and characteristics of the bitumen and reservoir rocks. Santa Fe Energy Company estimated an 80 recovery of in-place reserves in the E1/2 of the Tar Sand Triangle STSA, based on site-specific information and a proposed steam-drive recovery process (DOI, NPS, 1984). In the wilderness EIS, BLM elected to use the lower,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

average figure of 30 percent recovery for the wilderness EIS, as this figure is consistent with the Utah Combined Hydrocarbon Leasing Regional Final EIS (USDI, BLM 1984). Also, see the responses to General Comment 15.54 and Specific Comments 38.9 and 40.44.

**41.43 COMMENT:** Page 19, Table 5: There is an obvious inconsistency in the tar sand resource figures between the SAI rating of greater than 500 billion barrels and the footnoted range of 780 million to 100 billion barrels. A recent investigation of this deposit by the Utah Geological and Mineral Survey yielded a somewhat lower resource estimate. It shows that only about 23 square miles in the northeast section of the WSA are probably underlain by the tar sand. Using an average net pay of 125 feet thick and a yield of 4-gallons per ton, a tar sand resource of roughly 566 million barrels of bitumen may underlie the WSA. [State of Utah]

**41.43 RESPONSE:** The 500 billion barrels of oil referenced in the Draft EIS for an f4 tar sand rating was in error and should have read 500 million barrels of oil. Based on new information concerning the tar sand resource, approximately 208.5 million barrels of recoverable oil may underlie the Fiddler Butte WSA (see the Mineral and Energy Resources section of the EIS). This corresponds to the f4 rating given by SAI.

**41.44 COMMENT:** The Proposed Actions for the Dirty Devil, Horseshoe Canyon (South), French Spring-Happy Canyon, and Fiddler Butte WSAs may preclude an informed decision on whether to convert existing oil and gas leases to combined hydrocarbon leases in the Tar Sand Triangle Special Tar Sand Area. The Draft EIS for the Tar Sand Triangle did not identify a preferred alternative; neither has a preferred alternative been approved nor the Final EIS been completed. Since a preferred alternative has not been chosen by the Department for the Tar Sand Triangle, much less a decision made on whether to convert the leases, a decision should not be made on implementing or recommending a decision on wilderness for these areas until the lease conversion decision is made. [National Park Service]

**41.44 RESPONSE:** See the responses to Specific Comments 38.9 and 38.17.

**41.45 COMMENT:** On pages 3 and 4 of the Fiddler Butte WSA analysis, in response to comments on impact of tar sand on wilderness qualities, it is stated

that tar sand will not be developed inside designated wilderness. Yet on page 8, it is stated that "tar sand development on the 26,240 acres could only occur in a manner that would not be degrading to wilderness values and would not occur under this alternative." This wording is confusing and ambiguous. It gives me the impression that development could occur under certain conditions, then states it would not occur. Why not just state that tar sand will not be developed in wilderness areas? In other WSA analyses, development is tied to restrictive and protective stipulations, but it is not stated that development will not occur in wilderness areas. This issue should be addressed more explicitly; tar sand should not be developed at all in wilderness areas. [Tim Graham]

**41.45 RESPONSE:** The wording in the Final EIS has been clarified. Tar sand development is not expected for the No Action/No Wilderness Alternative in the short term but may occur in the long term. Tar sand development would not be allowed for the other alternatives in areas that become designated wilderness.

**41.46 COMMENT:** The locatable minerals data is incomplete. [Utah International, Inc., and Bureau of Mines]

a. Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration: historic past production of uranium, vanadium, copper, and silver; very limited roads and jeep trails on edges of the area; and moderate potential for future production of uranium, copper, vanadium, and silver in sedimentary rocks.

b. The Moss Back Member of the Chinle Formation is reported favorable for uranium (DEIS p. 20, Vol., IV). Our minerals investigation indicates that the Monitor Butte and Petrified Forest Members of the same formation also are favorable host rocks for uranium deposition. The Shufly-Bighorn, North Wash, Buck-acre Point, and Cedar Point areas are likely sites for the occurrence of high-grade, low-tonnage uranium deposits typically associated with the Chinle Formation throughout the Colorado Plateau.

**41.46 RESPONSE:** See the response to Specific Comment 41.37. The discussion of the uranium poten-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

tial of the WSA has been revised on the basis of the USGS 1985 report.

**41.47 COMMENT:** Inconsistent evaluations of wild-life were done. No mention of lizards, snakes, small mammals, migratory birds, and other large mammals such as ringtail cats, fox, badgers, weasels, and kit fox. Surveys need to be done to determine the possibility of peregrine falcon nesting sites. [Kim Jennyson]

**41.47 RESPONSE:** See the response to Specific Comment 37.14. To date there have been no field observations or inventory sightings of peregrine falcon nests recorded within the Fiddler Butte WSA.

**41.48 COMMENT:** This WSA contains important habitat for desert bighorn sheep. These animals and their habitat will only receive the protection they require through wilderness designation as proposed by the Utah Wilderness Coalition. [Sierra Club, Cache Group]

**41.48 RESPONSE:** Wilderness designation is not necessarily a criteria for good habitat for desert bighorn sheep. For example, there are numerous rugged locations in the West with good populations of desert bighorn that are not under study for or designated as wilderness. It is true that desert bighorn do best in relatively isolated areas, but there are other habitat requirements as well. Some locations having potential bighorn sheep habitat that may become designated wilderness, will not reach full potential for bighorn sheep, and due to existing and continuing use for domestic sheep, due to the transfer of disease. Existing livestock grazing is allowed in designated wilderness areas. See the response to General Comment 16.12.

**41.49 COMMENT:** Without any information given on the extent of mineral activity and grazing management changes, BLM concludes that development presents no problem. BLM needs to present the current grazing use, the range use increase from "range improvements," and the impacts that grazing will have on these plant species. [Utah Wilderness Coalition]

**41.49 RESPONSE:** The current grazing use is described in the livestock portions of the EIS. Existing livestock grazing use would continue for all alternatives. New livestock facilities may or may not be permissible depending on the alternative. Assumptions on these are described for each alternative. There are no proposed livestock developments within the area that would be designated wilderness with the BLM

Proposed Action, therefore with this alternative, livestock use would not be affected.

**41.50 COMMENT:** BLM is proposing a fairly extensive range improvement program along the benches surrounding the Block. None of these projects were described in detail in the Henry Mountain Grazing EIS. The land use plan for the area lacks information on range projects and whether they are inside a WSA or not. The Utah BLM Wilderness Draft EIS lists that 13 reservoirs and one spring development would be "maintained." BLM gave no information on the location of these developments. A map is needed in order to judge the impact of these projects relative to the wilderness alternatives. BLM failed to include actual use of grazing in this area. In the past, BLM has used the term "maintain" to construct essentially new facilities and to increase grazing use where little was occurring. BLM needs to list the current condition of these developments within the WSA and when they were last maintained. The Draft EIS gives no indication whether BLM is changing range use with these range improvements or not. BLM also gives no cost benefit analysis of these proposed projects as required under current grazing management policy. The costs to implement and the expected revenue need to be listed in the Draft EIS. If the costs exceed the benefits, then there is no justification in deleting areas from wilderness recommendation to build these kind of projects. [Utah Wilderness Coalition]

**41.50 RESPONSE:** The construction of new range improvement projects and the maintenance of existing projects are allowed within certain constraints in the WSAs (see Appendix 1). The EIS narrative provides the requisite information on existing and proposed livestock facilities in the WSA. A map of the vicinity is not needed for the reader to determine these facilities. The potential for future livestock facilities is not part of the rationale for excluding a portion of the WSA from BLM's Proposed Action. Also, see the response to General Comment 24.5 concerning costs and benefits of land treatments.

**41.51 COMMENT:** BLM only gives limited information on grazing use within the WSA. BLM uses a number of AUMs that probably exceeds both actual and allowed use. Based on the Henry Mountain Grazing EIS, permits are only given for 62 percent of the Sewing Machine Grazing Allotment. BLM falsely states in the wilderness Draft EIS, "Domestic livestock grazing would continue at 1,100 AUMs." These numbers represent permits sold and in the case of "active

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

preference," bargaining chips in selling allotment permits. They do not represent actual use. BLM needs to present the actual use based upon field monitoring of grazing. We request that BLM provide a history of monitoring of grazing use and its results. Grazing numbers are also distorted by the method used to calculate the number of AUMs used in the WSA. BLM assumes that the grazing use is uniform across the WSA both for the area outside the WSA and in the allotment and within the WSA. Some of the parts of the WSA receive no grazing use: the top of The Block, the Red Benches, and the White Rim. Some areas are used such as Cedar Point and along the Dirty Devil River.

This area is a candidate for wilderness designation because it is rugged and access limited. Absence of water prevents grazing use through most of the WSA. BLM needs to estimate the number of grazing AUMs based on actual use and natural limitations. The current method is consistently high in making estimates. [Utah Wilderness Coalition]

**41.51 RESPONSE:** Alternative B in the Henry Mountain Grazing EIS was selected as the preferred alternative for the Sewing Machine Grazing Allotment. Active preference is 1,600 AUMs while average licensed use is 998 AUMs which is 62 percent of preference. The 1,100 AUMs mentioned in the Wilderness Draft EIS concerns only those AUMs within the proposed WSA boundaries. A grazing monitoring history is not essential to the wilderness EIS and therefore is not included. Actual use information is collected at the conclusion of each grazing period and periodic inspections are summarized and compared to the licensed use, utilization, and trend studies. Summaries of all actual use are available in files at the Henry Mountain Resource Area Office. BLM does not assume that grazing use is uniform across the allotment. Those parts that are inaccessible or unproductive remain unallocated. AUMs in the Sewing Machine Allotment were calculated using the current vegetative information available in the Henry Mountain Resource Area Office. Grazing suitability has been determined by distance from water, slope of the terrain, carrying capacity, and class of livestock. Utilization studies are conducted throughout the allotment and are part of the allotment monitoring criteria and allotment evaluation process. Water may be a limiting factor in livestock distribution. However, water sources have been established in most parts of the allotment and allow for livestock distribution throughout the allotment. The proposed wilderness designation would not

affect existing grazing preference or livestock use as explained in the EIS and in Specific Comment Response 41.49.

**41.52 COMMENT:** Wilderness designation would protect outstanding natural scenery along the Dirty Devil River. This river provides numerous opportunities for primitive recreation which includes float trips and side canyon hikes. Parts of this river system have been proposed for the National Wild and Scenic River System. [Sierra Club, Cache Group]

**41.52 RESPONSE:** Scenic values, recreation opportunities, and potential for Wild and Scenic River designation are explained in the EIS.

**41.53 COMMENT:** The BOM conducted a minerals investigation (BOM Open File Report, MLA 132-82, 1982) of the 27,000-acre "Partial Wilderness Alternative" (DEIS p. 40, Vol. IV). The "Proposed Action" (DEIS p. 34, Vol. IV) includes about 6,000 additional acres. Should the "Proposed Action" or the "All Wilderness Alternative" (aggregating 73,100 acres) be recommended to the Secretary of the Interior for wilderness designation, mineral resources of the additional acreage should be investigated. [Bureau of Mines]

**41.53 RESPONSE:** Revised maps have been supplied to USGS and BOM for supplementary review of the Fiddler Butte Proposed Action.

**41.54 COMMENT:** BLM is correct when saying that their proposed alternative would decimate archaeological sites, "Even though mitigation measures would be taken, the overall effect on cultural resources could be significant due to the high amount of cultural resources anticipated in the area." BLM is required by law to prevent damage of these resources. The development planned would lead to open vandalism. BLM is required to manage any development to prevent this. BLM must choose an alternative which meets the requirements of the law. This comment is accurate and supported by the current management problems with cultural resources. This refutes the false claim made in the "Cultural Resource Memorandum of Understanding" (Appendix 8) which says, "Cultural values would not be adversely affected as a result of actions proposed in the Wilderness EIS." [Utah Wilderness Coalition]

**41.54 RESPONSE:** The Wilderness Draft EIS does not state that the proposed alternative would

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

"decimate" archaeological sites. None of the alternatives would have that kind of impact on cultural values. The statement referenced in the comment is found in the analysis of impacts for the No Action/No Wilderness Alternative. With the No Action/No Wilderness Alternative, the current protective practices as required by law would continue. For cultural resources, this means that detailed inventories and suitable mitigation would be done prior to any and all ground-disturbing actions. This would avoid, mitigate, or minimize the adverse effect from such actions. The impacts identified in the analysis reflect the realistic situation that not all vandalism, theft, and inadvertent disturbance to cultural resources can be prevented. Such actions as vandalism and theft occur with or without wilderness designation, despite prevention and law enforcement activities. The Cultural Resources Memorandum of Understanding found in Appendix 8 of the Draft EIS is correct in stating that "Cultural values would not be adversely affected as a result of actions proposed in the Wilderness EIS." The Proposed Action in the Wilderness EIS is to designate 32,700 acres of wilderness in the Fiddler Butte WSA. Also, see the response to Specific Comment 39.24.

**41.55 COMMENT:** Cultural resources are likely to occur within the WSA in high numbers. The NPS has inventoried NPS lands abutting the WSA. BLM has not done an inventory. The existence of absence of inventories needs to be described in the EIS. In any case, BLM can apply the NPS findings to estimate the number of expected sites within the WSA. This has not been done and reported in the Draft EIS. The Draft EIS does not even have a section in the Affected Environment section for this WSA describing this significant supplemental value. [Utah Wilderness Coalition]

**41.55 RESPONSE:** The section describing cultural resources was on page 22 in the Fiddler Butte WSA analysis in the Draft EIS, Volume IV. Also, it is included in the Final EIS. The EIS process requires no special inventories to be completed in the determination of the wilderness Proposed Action. The EIS is based on the best information available, including consultation with the State Historic Preservation Officer. See the responses to General Comments 9.6 and 20.2. The BLM Wilderness Study Guidelines require that BLM indicate the relative abundance and importance of special features to the area.

**41.56 COMMENT:** The only impact to recreation described is the closing of vehicle routes from use. BLM

fails to address the impacts that face wildlife and other natural resources if the routes remain open. BLM also fails to consider impacts to recreation in the Glen Canyon NRA from development permitted in the WSA. BLM fails to consider the impacts of the new roads that would be constructed and used after development within the WSA. [Utah Wilderness Coalition]

**41.56 RESPONSE:** Impacts to recreation are noted in the analysis. Current recreation use of the Fiddler Butte WSA is very low. Likewise, recreation use in the Glen Canyon NRA on lands immediately adjacent to the WSA also is very low. Since the existing use is low, any impacts to this use also would be low. Wilderness designation would preserve wilderness values. If an area is not designated wilderness, then these values, at least in part, could be lost. The EIS clearly portrays this situation. New roads would reduce primitive recreation, but would facilitate access for other forms of recreation. Depending on location and terminus, new roads in the region could increase and/or disperse recreation in the Glen Canyon NRA, subject to concurrence and approval by the National Park Service. BLM is not proposing to construct new roads as part of the No Action/No Wilderness Alternative, however, assumptions have been made on the disturbance and road requirements for developments projected for the WSA.

**41.57 COMMENT:** The Draft EIS and previous BLM decision on this area shows an outrageous bias against wilderness. The section under environmental consequences has a brief summary for recreation for two partial alternatives. The only consequence mentioned is the potential loss of ORV use. Added to this table should be: "With tar sand development, the WSA would not be used for primitive recreation because of degradation of primitive recreation values." BLM understates the future potential for wilderness activities. BLM ignores the opportunity for professional guide service and ignores the potential growth of hunting with the introduction of the bighorn sheep. Just as BLM has concocted future jobs and income from mineral leasing, BLM can more accurately estimate the future jobs and income from increased recreation use. By using more accurate values for recreation economy, a high economic return from wilderness can be seen. [Utah Wilderness Coalition]

**41.57 RESPONSE:** The table mentioned is intended to highlight the most significant environmental consequences directly related to wilderness. It is not

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

intended to repeat all of the detailed impacts for each alternative. The text of the EIS describes the impacts on recreation from mineral activities. Also, these impacts are further described in the separate Tar Sand Triangle Lease Conversion EIS (USDI, NPS, 1984b). BLM is cognizant of possible promotion of visitor use and for enterprises such as guide service. This is one of the three factors for formulating the Cluster Concept Alternatives in Volume I. See the response to Specific Comments 40.35 and 40.50.

**41.58 COMMENT:** In the Recreation section, there is no mention of OHV use. If there is no OHV use occurring in this WSA, that should be mentioned. [State of Utah]

**41.58 RESPONSE:** The use of roads and ways in the WSA is discussed; however, the text has been expanded to more specifically mention ORV use. The EIS uses the term ORV (off-road vehicle) rather than OHV (off-highway vehicle). As stated in the EIS, the ORV use has been estimated as actual count records are not available. The ORV use is low.

**41.59 COMMENT:** Volume IV adds a new level of screening that limits BLM's recommendation to the area "that has the most outstanding wilderness characteristics." The Draft EIS then proceeds to downgrade the opportunities for solitude and primitive recreation to match its meager wilderness proposal. Speculative tar sand values are the whole reason for the partial wilderness recommendation, even though tar sand recovery will never be economically or environmentally acceptable. The claim is made that 8,800 acres do not meet the naturalness criteria because of roads and ways. The roads and ways would have to be over a 0.5 mile wide to eliminate that much acreage. Apparently this is another ploy to downgrade the wilderness values in the WSA. While the Draft EIS's partial wilderness Proposed Action is a vast improvement over the earlier ridiculous recommendation, it should be abandoned in favor of an All Wilderness proposal to protect the outstanding wilderness and scenic values (all of the WSA has either Class A or Class B scenic quality). [Owen Severance]

**41.59 RESPONSE:** See the responses to Specific Comments 39.4 and 40.54.

**41.60 COMMENT:** A summary of acres with and without outstanding solitude should be added. [State of Utah]

**41.60 RESPONSE:** The acreage is provided in parentheses as part of the narrative on solitude in the Description of the Affected Environment. The figures indicate 25,600 acres have outstanding solitude and 47,500 (39,400 + 8,100) acres have less than outstanding solitude.

**41.61 COMMENT:** The draft proposals for French Spring/Happy Canyon and Fiddler Butte were both compromised by their speculative potential for tar sand. While much of the acreage remains wild in character regardless of trails and ways resulting from resource exploration. A wilderness-quality experience can yet be found along and adjacent to such infrequently used roads amid the Red Benches and up Happy Canyon; no vehicles for miles to disturb the solitude. There is so little traffic on these desert routes, one begins to wonder how it is that recreational, screening, and solitude arguments can be raised against including portions of these WSAs from wilderness recommendation. [Bruce Chesler]

**41.61 RESPONSE:** See the response to Specific Comment 40.55.

**41.62 COMMENT:** The Fiddler Butte WSA is characterized by extremely scenic areas. A variety of outstanding primitive and undefined opportunities are possible including backpacking, photographing, drawing, hiking, and geologic sightseeing. BLM has defined primitive recreation to include either a diversity of possible activities or one activity of outstanding quality. Yet it did not standardize what the variety of activities should be. This should be done. One WSA is eliminated for the same activities which enhance another WSA and make it qualify for wilderness. Contrary to BLM's statement for Fiddler Butte WSA, wilderness areas are to have few to no designated sites; loop trips are not a requirement for wilderness as the length of the canyon does not determine the wilderness quality of the canyon. Unnatural intrusions outside of the WSA should not be considered to affect the naturalness of the WSA. Inconsistencies occur in BLM's evaluation. The EIS says 64,300 acres meet the naturalness criterion, yet the same mining activities which affect the naturalness criterion reduce the solitude criterion to 39,000 acres. (How can this be?) The benchland east of the Dirty Devil is not considered by BLM to have outstanding wilderness qualities. I disagree with this. I have observed grassland habitats with a road in the middle of 4,000 acres. The vastness of the area accentuates the solitude and primitive recreational opportunities. The

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 41: FIDDLER BUTTE WSA (CONTINUED)**

lack of habitation, the isolation, and the large size (34,000 acres) allows enough space for visitors to find seclusion. Outstanding opportunities for photography, backpacking, and geologic sightseeing exists. Extended trips through the canyons of the North Wash to the Dirty Devil to the extremely scenic benchlands of the Colorado River. Opportunities to view a variety of surface geology sites form high, narrow ridges deeply and abruptly cut by meandering canyons to a river canyon 1,000 feet deep extending to extremely scenic, vast views of mesas and isolated table tops (similar to the quality of scenes in Canyonlands National Park) exist in this WSA. [Kim Jennyson]

**41.62 RESPONSE:** The WSA must possess at least naturalness and one of two other criteria. These are, outstanding opportunities for solitude and outstanding opportunities for primitive or unconfined recreation. During the wilderness review process, BLM personnel determined that some of the areas in the Fiddler Butte WSA lack outstanding solitude due to mineral activity and related vehicle use on ways and roads, and that opportunities for outstanding primitive recreation also are lacking in certain locations. About 88 percent of the WSA is natural. Since many wilderness values are subjective, BLM has relied on individual judgment of personnel most familiar with the WSA to determine solitude and primitive recreation attributes. It is common that people may disagree on matter of judgment.

**41.63 COMMENT:** BLM's assessment of opportunities for solitude is not accurate. [Utah Wilderness Association, Utah Wilderness Coalition, and Tim Graham]

a. We cannot understand how BLM has determined 40,000 acres do not provide outstanding opportunities for solitude. The size of the unit, when added with adjacent Park Service proposed wilderness and roadless terrain, is a potential wilderness of well over 100,000 acres. Size is a main criteria of opportunities for solitude and clearly it is of sufficient size. Outside sights and sounds are another main criteria, and there are no distracting outside sights and sounds. Solitude is defined as a "secluded spot away from others" and since visitor use is estimated at fewer than one visitor day per year per 1,000 acres (60 visitor days per year), it is inconceivable one cannot find solitude anywhere in the unit. Views of the Henry Mountains, Dirty Devil River County, and the Abajo Mountains give one a feeling of incredible isolation, which adds to the feeling of solitude. BLM needs to reassess the wilderness values of the Fiddler

Butte WSA. A fair analysis will show the entire area has wilderness values. It might be valuable to spend an entire week wandering around the WSA and make a determination of solitude from experience. This should remove any doubt about the opportunities to find solitude in the area.

b. BLM deleted areas from wilderness recommendation using the invalid topographic confinement criteria for solitude. BLM falsely finds that hundred foot deep drainages which criss-cross nearly 40,000 acres have "less than outstanding opportunities for solitude." BLM ignores the enormous panorama of natural cliffs, mesas, benches, and badlands and the isolation a visitor would find in this huge natural landscape. BLM also falsely finds the eastern part of the wilderness area lacks the necessary topographic relief to offer outstanding opportunities for solitude. The topographic relief of this part of Fiddler Butte WSA is as undulating and convoluted as other qualifying areas.

c. The 40,000 acres not recommended as suitable were said to have less than outstanding opportunities for primitive recreation and solitude. This is an outright lie. We spent a week in The Block-Fiddler Butte area in the spring, which is the season of highest use for southern Utah public lands, and did not see a single other person. We also hiked in the North Wash side canyons and again saw no one. In fact, there are areas devoid of human impact, and this is one of the wildest places we've ever been in. All of it has tremendous opportunities for solitude and primitive recreation.

d. One of the major short comings of the entire BLM review process is in the application of solitude criteria. It does not take 200-foot cliffs and canyon walls to screen one 6-foot person from another. An area that is remote and large, even if relatively flat, offers incredible opportunities for solitude because there are few people there. A type of terrain that you seem to continually reject on this basis is slickrock domes and rolling fossil dunes such as are found in Fiddler Butte, Scorpion, Escalante Canyon, and other WSAs. This country is very unique and extremely beautiful and wild and should be preserved. The lack of vegetation and deep canyons do not preclude solitude. How many people did your field workers see during their inventory on these slickrock areas?

**41.63 RESPONSE:** The WSA is of considerable size and offers scenic vistas. Topographic relief is just

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 41: FIDDLER BUTTE WSA (CONTINUED)

one of the factors considered in determining opportunities for outstanding solitude. The feeling of isolation does not equate with outstanding solitude. Most of Fiddler Butte WSA currently is a place of low visitor use. However, the number of visitors seen at any given period of time is not a criteria for solitude. Important factors contributing to opportunities for solitude are vegetative screening, topographic relief, vistas, and physiographic variety. For the definition of solitude as it applies to wilderness study, see the Glossary definition in Volume I. BLM's Proposed Action for the Fiddler Butte WSA includes those areas having the mandatory wilderness characteristics. Also, see the responses to General Comments 3.7, 3.25, 22.3, 22.5, and Specific Comment 41.62.

**41.64 COMMENT:** As nearly as I can determine from public input, in excess of 99 percent of the full-time residents of Garfield County are adamantly opposed to the designation of any wilderness within our county for any reason. The Fiddler Butte WSA cannot be supported by me as a Garfield County Commissioner for wilderness designation because the opportunity for primitive and unconfined recreation is less than outstanding due to a lack of diversity of recreational opportunity. These areas are simply geological formations which are common to the region. They are limited by either a lack of curiosity-arousing features or other unique or unusual features which would attract visitors, and their designation as wilderness would seriously limit future development of our county's mineral and geological resources. [Guy Thompson]

**41.64 RESPONSE:** The views expressed are noted. See the responses to General Comments 1.1, 2.21, and Specific Comment 30.40.

**41.65 COMMENT:** We are particularly concerned about the following Fiddler Butte areas: (1) Fiddler Cove, (2) South Hatch Canyon and (3) slopes leading to The Block. [Sierra Club, Cache Group]

**41.65 RESPONSE:** The above mentioned locations are not included in the BLM Proposed Action. The EIS analysis for the 32,700-acre Partial Wilderness Alternative indicates that existing wilderness attributes in those areas could be eliminated with tar sand development in the long-term future.

**41.66 COMMENT:** Wilderness designation coincides with Natural Zone and recommended wilderness in the Glen Canyon General Management Plan (GMP) for

these areas: Burning Hills, Escalante Canyon Tract 5, Horseshoe Canyon South, Fiddler Butte, Little Rockies, Grand Gulch, and Dark Canyon. [National Park Service]

**41.66 RESPONSE:** See the response to Specific Comment 39.31.

**41.67 COMMENT:** Map 1 indicates that there are nine State in-held sections not eight. The text in two locations indicates eight. [State of Utah]

**41.67 RESPONSE:** The maps and text have been corrected and updated. There are eight in-held State sections (5,118.80 acres).

**41.68 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**41.68 RESPONSE:** See the response to General Comment 14.27

## SECTION 42

### MT. PENNELL WSA

**42.1 COMMENT:** BLM finished the second inventory for this area without any opportunity for public comment. BLM was required to use the inventory policy in determining boundaries. This allows BLM only to exclude the minimal areas that have significant human impacts. In this case BLM deleted nearly 70,000 acres having almost no impacts. There are some chainings on the top of Tarantula Mesa but most of the mesa is completely natural. The vehicle route on the top should be cherry-stemmed if it qualifies as a road, but BLM has no justification for dropping the



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

10,000-acre mesa top because of the impacts of the route which occupies less than 20 acres. None of the canyons draining to the north are impacted. Those canyons include Divide Canyon, Spring Canyon, Five Canyon, Seven Canyon, and Bitter Creek. These deep canyons are large enough to be considered on their own. They clearly qualify for wilderness designation. They have no impacts and are part of the Mt. Pennell WSA. BLM's boundary to the south of No Mans Mesa excludes many areas without impacts. BLM should move that boundary to the edge of significant human impacts. We request that BLM provide us with information on why these areas were excluded from wilderness study. We request that BLM provide intrusion maps and written text showing the significance of these impacts. [Utah Wilderness Coalition]

**42.1 RESPONSE:** WSA boundaries were determined during the wilderness inventory phase of wilderness planning. The inventory decisions included public input and were subject to appeal. Certain lands were added to the WSA as a result of the appeal, as directed by the Interior Board of Land Appeals. See the response to General Comment 3.1.

**42.2 COMMENT:** Mt. Pennell is ranked as having both high wilderness values and high conflicts compared with other WSAs within the region. The 25,800-acre Partial Wilderness Alternative reduces most conflicts. An additional adjustment on the southwest side of the WSA for the 1,183-acre proposed chaining is necessary to reduce wildlife and livestock conflicts. [State of Utah]

**42.2 RESPONSE:** There is an area in the Mt. Pennell WSA that was identified in the Henry Mountain Grazing EIS (USDI, BLM, 1983b) as having a high potential for vegetation treatment on approximately 1,200 acres. A chaining project would not be permissible with the wilderness IMP, and such a project has not been proposed at this time. It is recognized in the EIS as a future potential, particularly with the No Action/No Wilderness Alternative. A chaining could provide some additional forage for bison and/or livestock, but it may affect other values. With the Partial Wilderness Alternative, which is BLM's Proposed Action, the future potential for a 1,200-acre chaining would be foregone with wilderness designation of that area. This is noted in the EIS analysis. The suggested adjustment in the partial alternative has not been used as BLM believes that other locations in the vicinity can be used for vegetative treatment (or retreat-

ment) in conjunction with bison and livestock management. See the environmental assessment titled, "Henry Mountain Coordinated Resource Management Plan" prepared by the BLM Richfield District in September 1988 (USDI, BLM, 1988).

**42.3 COMMENT:** BLM's no wilderness recommendation for this WSA is based on the worst misrepresentations in the entire EIS. "Roads" are "cherry-stemmed" in violation of the IBLA remand and BLM does not properly characterize the routes as old, unused, eroded blade tracks that are substantially unnoticeable by any standard. The wilderness values of the area are minimized through misapplication of the outstanding opportunities criteria. [Rodney Greeno]

**42.3 RESPONSE:** BLM's Proposed Action for the Mt. Pennell WSA has been reevaluated and changed. In the Final EIS the 25,800-acre Partial Wilderness Alternative is the BLM Proposed Action. This includes the mountain and its immediate surroundings. BLM has determined that the remainder of the WSA does not meet wilderness criteria of naturalness, outstanding opportunities for solitude, or outstanding primitive and unconfined recreation. Although some of the routes are old, eroded blade tracks and seldom used, there are others such as those on Cave Flat and Swap Mesa which receive a substantial amount of use, especially from bison and deer hunters. Also, see the responses to General Comments 4.1, 4.2, 22.3 and 22.5.

**42.4 COMMENT:** BLM concludes that the impacts of roads prevent wilderness quality solitude from being experienced. The two areas mentioned in which there are impacts cover no more than 5,000 acres. The remaining area of over 50,000 acres is not described at all by BLM. This area, completely natural, has the topographic and vegetative screening required in BLM's confinement criterion for solitude. IBLA remanded this area partially for BLM's failure to consider all the factors, including size, in assessing solitude. The broad vistas of the entire unit from mesa edges and the ability to hike for days in the area without the sign of man are key factors BLM needs to address. BLM's conclusions conflict with the direction IBLA gave BLM in the study of wilderness values. We disagree on the significance of these impacts on Swap Mesa in impairing the wilderness experience. These are not roads but tracks created by the mere passage of vehicles. They are 2-wheel tracks across the broad plateau. There is no evidence of maintenance

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

and since the park closed access, use is almost nonexistent (some still trespass). A visitor on the mesa cannot see the track if more than 100 feet from it. It disappears in the mesa shrubs and forest. [Utah Wilderness Coalition]

**42.4 RESPONSE:** The presence of roads is only one factor affecting solitude. Because of relatively flat terrain and sparse vegetation, the entire western portion of the WSA lacks outstanding opportunities for solitude. Fifteen primitive recreational activities were evaluated and none met the criteria of outstanding as defined in the Glossary in Volume I.

The road up Swap Canyon and onto Swap Mesa is used annually for range administration and hunter access. The Land Use Plan for Capital Reef National Park shows this road open across the park for access onto BLM-administered lands. Use of this road is not done in trespass. Due to the primitive nature of this road, it does take some hand maintenance each year to use it. During the bison hunt, the first vehicle in goes 4-wheel drive and shovel. By the end of the bison hunt, the roads can be traversed with 2-wheel drive vehicles.

**42.5 COMMENT:** The history of the Mt. Pennell WSA exhibits an unfortunate anti-wilderness bias on BLM's part. Originally BLM identified only a 27,300-acre Mt. Pennell WSA. An appeal to IBLA forced BLM to take a second look. Again BLM recommended only 27,300 acres, but a second appeal forced BLM to adopt the current 74,300-acre WSA boundary. BLM's statement in the EIS that 23.1 miles of cherry-stems would not be closed under the All Wilderness Alternative and the current WSA boundaries are in violation of IBLA's reversal decision. IBLA did not cherry-stem any ways from the WSA. [Utah Wilderness Association]

**42.5 RESPONSE:** Portions of these cherry-stemmed roads have been removed in the Final EIS. Others have been maintained by mechanical means and therefore meet the definition of a road (compare the maps in the Draft and Final EIS). The regulations require them to be excluded from wilderness study status. Also, see the response to Specific Comment 42.4.

**42.6 COMMENT:** BLM insists that other management practices will protect the wilderness values in a nonwilderness alternative. The history of mineral exploration in this unit exposes the falseness of this argument. During the inventory, BLM allowed extensive drilling and road construction within that portion of

this unit under appeal and outside the present WSA. BLM required no reclamation, thereby failing to follow the Interim Management Policy. BLM will only protect wilderness values when mandated to do so and even then reluctantly. [Utah Wilderness Coalition]

**42.6 RESPONSE:** The purpose of wilderness designation is to preserve wilderness values. In many cases, wilderness preservation is not compatible with traditional multiple-use management. In such areas if wilderness values are not preserved through wilderness designation, then eventually it is likely that they may be lost. If nonwilderness supplemental values are at risk, then some designation other than wilderness designation (such as ACEC) could be used to highlight the need for protection. The EIS No Action/No Wilderness Alternative identifies impacts which may occur without wilderness designation. Some locations may retain "defacto" wilderness character over the long-term future.

**42.7 COMMENT:** There are discrepancies in the figures for in-held State lands. [State of Utah and Michael Salamacha]

a. The text for the All Wilderness Alternative should read, "acquisition of 17 sections of State land (10,777 acres), nine inside and eight outside WSA boundaries.

b. Map 1 has nine State sections within the WSA, yet in the All Wilderness proposal, BLM plans "acquisition of six sections of State land (71 acres), one inside and five outside WSA boundaries." Could BLM explain this? And how do six sections of State land total 71 acres?

**42.7 RESPONSE:** The text for the All Wilderness Alternative has been corrected. This agrees with Map 1. It is noted that all information regarding State in-holdings and adjacent land has been revised to reflect the changed position of the State, as explained in Chapter 1 of Volume I.

**42.8 COMMENT:** Resource conflicts for the Mt. Pennell WSA have been overstated. [Utah Mountain Club, Utah Wilderness Coalition, Scott Delong, Mark Peterson, et al.]

a. Mt. Pennell WSA is a glaring example of an area found unsuitable with only low mineral potential.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 42: MT. PENNELL WSA (CONTINUED)

b. The potential for these energy/mineral resources is low enough not to offer a serious conflict with wilderness designation.

c. I have been trying to find the mineral conflict in this WSA and frankly I am baffled. There are coal deposits in this WSA, but the Draft EIS states: "the entire acreage is unsuitable for surface mining because of crucial bison habitat." The EIS asserts that surface mining would not be allowed even under the No Action/No Wilderness Alternative. The Draft EIS further clarifies that: underground recovery (of coal deposits) is not feasible and it states: "There is no active drilling or production of oil and gas or other minerals in the WSA . . . Oil and gas potential is rated low." The Draft EIS expands even further: "Likelihood of development (of any oil, gas, or minerals) is low." And the Draft EIS gives the most telling comment: "The only known or possible occurrence of salable minerals in the WSA are sand and gravel (deposits) . . . considered . . . submarginal." Where is the crucial mineral conflict?

d. It is inconceivable that BLM could recommend that no wilderness be designated in this fascinating and uniquely suitable area. There is nothing about this WSA that would logically disqualify it for wilderness designation. The Draft EIS brims with accolades for this area. What intrusions? How can BLM cite "intrusions" when elsewhere it states that 71,000 acres appear natural? In 1979, BLM tried to invoke the presence of roads in order to fragment and shrink the large roadless area consisting of Mt. Pennell and its surrounding mesas and badlands. The Interior Board of Land Appeals found that BLM was not acting in the letter or spirit of FLMPA, and reinstated Swap Mesa, Cave Flat, and Muley Creek. In 1986, BLM is once again citing mythical "intrusions" (roads) which do not actually intrude and which do not alter the natural and scenic qualities of this outstanding WSA. The maps provided in the Mt. Pennell analysis do not demonstrate any roads or man-made facilities that might interfere with wilderness designation for the entire WSA. The "mineral conflicts" that BLM cites as a reason for rejecting this area for wilderness status can not be found on reviewing the Draft EIS analysis. The EIS description of impacts of the All Wilderness Alternative states that wilderness designation "would not result in any significant loss of potential for oil and gas recovery." Regarding coal potential, "the identified coal area has already been established as unsuitable for surface mining activity, and underground recovery is not feasible." An All Wilderness recommen-

ation "would not result in any significant loss of locatable mineral resources." We believe that bison management can be accomplished in a wilderness area as well as anywhere. What is unique about bison management? The EIS does not describe or analyze the "bison projects" which are alluded to, but it does state that, "No wildlife management facilities exist in the unit and none are planned." The chaining you propose has been partially "justified" in the Draft EIS by your casual suggestion that it may be beneficial to wildlife, including bison. But it is clear that the chaining would be for domestic livestock. Bison clearly don't need the extra forage. The importance that you give to chaining is a fatuous maneuver that lends nothing to your rationale for rejecting wilderness.

e. It is unthinkable that this area would not qualify for inclusion in the National Wilderness Preservation System. The entire area, from Spring Canyon in the north, to Swap Mesa in the south, to Mt. Pennell itself, should be protected to the fullest extent imaginable.

f. BLM states three reasons: intrusions, bison projects, and mineral potential. Yet the Draft EIS does not show these as credible or substantial reasons. By BLM's own definition, the WSA is natural and unintruded. The Draft EIS does not describe any specific bison projects and bison management would be highly compatible with wilderness. The Draft EIS also advocates that there are no significant mineral conflicts in the WSA. About 50,000 acres of the WSA is critical wildlife habitat.

**42.8 RESPONSE:** The Proposed Action has been changed from the No Action/No Wilderness Alternative in the Draft EIS to the Partial Wilderness Alternative in the Final EIS. The rationale for the Proposed Action is summarized in Appendix 11 in Volume I. The rationale is not based on significant minerals or bison management factors, although long-term potential for coal extraction in the north Cave Flat area is mentioned. It is based on the lack of outstanding wilderness values in the southwestern part of the WSA. IBLA did remand 47,000 acres in the southwest part of the WSA to be reevaluated. BLM has reevaluated the area and again determined that this area does not contain the mandatory wilderness characteristics. The definition of "outstanding" as shown in the Glossary is one of the criteria not met. With BLM's Proposed Action in the Final EIS, the southwestern area would be managed with traditional multiple-use principals as contained in the Henry Mountain Resource Area

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

Management Framework Plan (USDI, BLM, 1982b). The area not proposed as wilderness has 34.1 miles of travel-route intrusions which substantially reduce the naturalness value of the WSA. While some of the ways and roads are rough and require 4-wheel drive vehicles for passage, they are well established and compare to many back country roads. Additional information on mineral potential and bison management is included in the Final EIS and is reflected in the analysis; but as previously noted these items are not significant factors in determination of the Proposed Action.

**42.9 COMMENT:** The original BLM proposal for Mt. Pennell found 27,300 acres as suitable for wilderness. The IBLA remanded 47,000 acres, yet BLM could only find 25,800 acres as acceptable for wilderness designation. This is, strangely enough, the same area considered, but rejected in the initial survey (see scoping document "Introducing the Utah Statewide Wilderness EIS," p.3). One would think that of the 47,000 acres the IBLA determined was wrongfully omitted, that some portions have wilderness qualities, otherwise did the IBLA force BLM to reexamine these 47,000 acres? We feel that all 47,000 acres, as well as the 27,300 acres in the original BLM WSA, qualify for wilderness status. [Utah Wilderness Coalition]

**42.9 RESPONSE:** BLM has reevaluated information and analysis and is now proposing the Partial Wilderness Alternative for this WSA. IBLA remanded a portion of Mt. Pennell for reexamination based on inventory procedure and not wilderness character determinations. The area remanded did not, and still does not, contain mandatory wilderness characteristics. Therefore, BLM has not included that portion in the Proposed Action, as explained in Appendix 11 of Volume I.

**42.10 COMMENT:** BLM offers no reasons within the study policy justifying dropping this area. All the wilderness values are found to meet the criteria. No manageability problems are identified. The marginal quality of energy/mineral resources fails to identify a serious conflict with wilderness designation. [Utah Wilderness Coalition]

**42.10 RESPONSE:** BLM has revised the Proposed Action from the Draft EIS and now has included 25,800 acres at Mt. Pennell in the Proposed Action in the Final EIS. The other portion of the WSA (including Swap Canyon, Swap Mesa, and Cave Flat) is not in the Proposed Action because BLM has determined that it

does not meet the criteria due to lack of outstanding opportunities for solitude, as well as substantial road intrusions which affect the wilderness quality of naturalness. In addition, it does not meet the outstanding primitive recreation criteria. See the responses to Specific Comments 42.4 and 42.8.

**42.11 COMMENT:** "Although the designation of this WSA as wilderness would contribute to the diversity of ecosystems and landforms in the NWPS, the benefits of this contribution are diminished by the existence of similar WSAs in the Henry Mountains which are recommended as suitable for wilderness designation." This conclusion exposes a BLM quota system limiting the size and number of areas in the wilderness system. [Utah Wilderness Coalition]

**42.11 RESPONSE:** BLM has revised the Proposed Action to the Partial Wilderness Alternative for this WSA. This in itself refutes the notion that BLM has a quota system limiting the size or number of areas in the wilderness system. The concept of diversity is not used to eliminate areas from wilderness designation but to strengthen rationale for areas that may contribute significant and unique attributes to the National Wilderness Preservation System. See the response to General Comment 8.22.

**42.12 COMMENT:** We are especially concerned about the Swap Mesa canyon complex. BLM's rationale for not recommending this canyon for wilderness is not clear. [Sierra Club, Cache Group]

**42.12 RESPONSE:** The rationale is summarized in Appendix 11 of the Final EIS. The objective of the proposed Partial Wilderness Alternative would be to include those areas having outstanding wilderness values. See the response to Specific Comment 42.10.

**42.13 COMMENT:** I have a real problem with the fact that the Mt. Pennell WSA in Volume IV has BLM proposing a Partial Wilderness Alternative of 25,800 acres, while Volume I fails to list the Mt. Pennell WSA as a proposed wilderness of any kind--it is absent from the list in Table 10. Since the history of this WSA is one of the subterfuge on the part of BLM, I would like some explanations as to what is going on. [Michael Salamacha]

**42.13 RESPONSE:** The entry in Volume IV of the Draft was in error. This was corrected with an errata published in the Federal Register and distributed to the EIS mailing list. The Proposed Action for the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

Final EIS is not the same as in the Draft EIS. Volumes I and IV have been revised accordingly. See the responses to General Comment 25.17 and Specific Comment 42.8.

**42.14 COMMENT:** In this unit BLM continues its history of divide and conquer with respect to wilderness. In spite of being overturned by the IBLA (UWA et al. appeal) in which the appealed portion of the Mt. Pennell WSA was reinstated as such, BLM returns to its old logic as a way to minimize the outstanding character of the unit. The 50,000 acres west of Mt. Pennell proper do, in fact, provide outstanding opportunities for solitude and primitive and unmotorized recreation. My own experience in this portion of the unit on several occasions has reaffirmed this reality. I am submitting a copy of my affidavit which was used in the UWA et al. appeal (1980) as documentation of this area's outstanding quality. [Dean Petaja]

**42.14 RESPONSE:** The Mt. Pennell WSA identified in the BLM intensive wilderness inventory decision, was 27,300 acres. As a result of an appeal to the Interior Board of Land Appeals (IBLA), BLM was instructed by IBLA to add an additional 47,000 acres to the WSA. This additional acreage has been added increasing the size of the Mt. Pennell WSA to 74,300 acres. In the western portion of the WSA, BLM has determined that opportunities for solitude are less than outstanding because large portions of the terrain are relatively flat and the vegetation is too sparse to provide outstanding screening. The presence of numerous roads and ways detract from the opportunities for solitude. Overall, these factors considered together indicate that opportunities are less than outstanding on 56,500 acres in the western portion of the WSA. See the response to Specific Comment 42.8. The evaluation of outstanding solitude and recreation qualities is subjective in nature. It is not uncommon for differences of opinion in such subjective determinations. BLM has relied on the professional judgment of recreation specialists and other field personnel most familiar with the area.

**42.15 COMMENT:** The proposed vegetation treatments should not be used as rationale for not proposing wilderness. [Utah Wilderness Association, Scott Delong, and Carleton Detar et al.]

a. The decision to find the 25,000 acres in the Partial Wilderness Alternative "unsuitable" due to a proposed chaining is unjustifiable. Ignoring 25,000 acres of wilderness to provide 92 AUMs for live-

stock grazing is "absolutism" in land management. Worse yet, there is no indication of how many of the increased bison AUMs will be available to wildlife. It is entirely possible wildlife and the public will receive nothing from the chaining, except the bill. Certainly there must be options to chaining to provide for an additional 40 AUMs for bison. What about a controlled burn or retiring or exchange of existing livestock permits? Clearly it would be far less expensive than chaining.

b. It is erroneous to sacrifice 75,000 acres of outstanding wilderness to provide for at best 40-50 extra AUMs out of 3,300. We urge adoption of the All Wilderness Alternative with the inclusion of the cherry-stems in the lower areas. These cherry-stems cover "ways" and not "roads."

c. To find 75,000 acres of Utah's finest wilderness "unsuitable" in order to increase AUM's by 132 is stunning and one of the worst decisions made in the entire BLM wilderness review. The current No Wilderness recommendation is unsupportable and must be changed. The analysis in the Draft EIS clearly shows the All Wilderness Alternative is the right alternative for Mt. Pennell WSA.

d. One of the great ironies is BLM excludes this area based on proposed vegetation manipulation plans in order to increase forage for the bison. Yet, the proposed land treatments will increase forage for less than a dozen bison. Mt. Pennell is far more important as wilderness to these wild animals.

e. Mt. Pennell is a unique wilderness resource deserving of wilderness status. There are no significant or irremediable human intrusions. There are no significant mineral or energy conflicts. While chaining is incompatible with wilderness, bison management is not. There are no real conflicts here. I certainly hope that you are not purposely denying wilderness status to a beautiful 143,125-acre area just to increase a handful of stockmen's grazing rights by a measly 92 to 132 AUMs!!! I refuse to believe that you could be capable of such perfidy. Your recommendation should definitely be changed in the Final EIS.

**42.15 RESPONSE:** AUMs for livestock and bison are not factors in the rationale for BLM's Proposed Action. See the response to Specific Comment 42.4. The EIS analysis indicates the effects to livestock grazing and bison that would result for each of the alternatives. There are two allotments on the Henry

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

Mountains allocated totally to bison. There is an agreement between BLM and the UDWR to maintain the bison herd at 200 breeding age animals. Studies and coordination are continuing relative to livestock and bison forage needs, and potential management actions, evidenced by the environmental assessment referenced in response to Specific Comment 42.2. which focuses on forage and bison management. Also, see the response to Specific Comment 42.5 concerning cherry-stem roads.

**42.16 COMMENT:** BLM's recommendation to drop 74,000 acres of prime wilderness has no basis in the physical reality of the area. Rather than ignore the wilderness values of Mt. Pennell, including the Cave Flat, Swap Mesa, and Muley Creek country, and shy away from minor management issues BLM should recommend the All Wilderness Alternative for Mt. Pennell. The proposed cherry-stems in BLM's All Wilderness Alternative, with the exception of Bulldog Ridge, are absurd. These are unmaintained "ways" and should not be "cherry-stemmed." [Dean Petaja]

**42.16 RESPONSE:** See the responses to Specific Comments 42.5, 42.8, and 42.15. BLM has determined that some of the routes are roads and not ways, according to the applicable definitions. Also, see the responses to General Comments 4.1 and 4.5.

**42.17 COMMENT:** Volume I of the EIS says the Proposed Action "includes all areas and acres currently judged by BLM to meet the test of suitability. Units may have low wilderness values but no identified conflicts with other resources." I basically agree with this criteria; however, I wish to comment on how the criteria were applied. There are many areas where the Draft EIS identifies no conflicts with other resources which were not proposed for wilderness. These areas lack significant human imprints and are manageable as wilderness; therefore, by BLM's own criteria, they should have been recommended. Specific examples include much of Mt. Pennell. [John Veranth]

**42.17 RESPONSE:** See the responses to General Comments 3.5 and 3.14.

**42.18 COMMENT:** Cave Flat and Swap Mesa are heavily forested and provide outstanding opportunities for solitude and primitive recreation. Hiking in the fall and winter you are likely to encounter the Henry Mountains bison herd in this area. Indeed, 32,000 acres of this land is crucial-critical bison win-

ter range. Vistas of Mt. Pennell itself, the surrounding terrain, and the Waterpocket Fold (Capitol Reef NP) are stunning and give one the feeling of vast solitude. These "lowlands" are an integral part of the Henry Mountains and add to the wilderness experience of the entire region. Conflicts should be used to find parts of WSAs unsuitable and not highly subjective and questionable determinations of outstanding opportunities. [Utah Wilderness Association]

**42.18 RESPONSE:** Cave Flat and Swap Mesa are important areas contiguous to the Henry Mountains and the Waterpocket Fold. However, these areas lack the mandatory criteria of outstanding opportunities for solitude, and primitive and unconfined recreation, as defined in the Glossary in Volume I of the EIS. The unique bison herd and its habitat, vistas, and scenery are considered special features, rather than mandatory wilderness criteria. Also refer to the response to Specific Comment 42.14.

**42.19 COMMENT:** Mt. Ellen received a fair though not entirely favorable wilderness recommendation in the Draft while Mt. Pennell was refuted as a wilderness candidate. I argue that these mountainous scapes on the west flank of the Henrys are important to the ecological and habitat communities of the whole, and do not portray adequate natural circumstances when split up or left for coal development entirely. Mention in the Mt. Pennell analysis is made of habitat "improvements" necessary for the free-roaming bison herd. If this group of animals is so notably wild and free, why must we manage the habitat for them? The best we could do for these and other native plants, animals, and soils in the Henrys would be to classify these WSAs as wilderness and lay off the improvements and coal mines. My suggestion for the west side mesas (Swap, Thompson, Wildcat, Tarantula, S. Caineville) would likewise be to let them remain wild for the cactus, mule deer, and raptors. The riparian stretch along the Fremont River below the South Caineville Mesa and that stretch of ephemeral streams providing headwaters for Bullfrog Creek should likewise be preserved for its life-giving water and plants. In as dry a region as this, certainly water is a critical feature on the landscape for both human visitor and animal resident. The Henry Mountains and surrounding pediments, mesas, and badlands represent a significant national resource from scenic, recreational, and scientific standpoints. Please make it a point, in the final recommendations, to increase the acreages of wilderness on these two areas. [Bruce Chesler]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 42: MT. PENNELL WSA (CONTINUED)

**42.19 RESPONSE:** Public lands and the resources, such as those noted in the comment, are administered under the multiple-use concept as mandated by the FLPMA. Land use plans are prepared by BLM to address the resource values and to assess trade-offs among the various uses. BLM wilderness study also addresses these various uses and potential uses as described in the EIS. In the determination of BLM's Proposed Action for the Final EIS, BLM has added 7,324 acres of wilderness for Mt. Ellen-Blue Hills and 25,800 acres of wilderness for Mt. Pennell.

**42.20 COMMENT:** Why hasn't BLM done a flip-flop on this WSA like it has on the Bull Mountain WSA? "The WSA offers exceptional scenic values." Although the WSA is about 17 miles by 16 miles, BLM claims that 76 percent of the area lacks outstanding opportunities for solitude. This claim is so absurd that I don't need to make any additional comment. The area that is supposed to lack outstanding opportunities for primitive recreation was made to match the area outstanding opportunities for solitude. Does BLM really expect anyone to believe this crap? Land with Class B scenic quality was given a Class IV VRM Classification. Actually, the area received a No Action/No Wilderness recommendation because of "the existence of similar WSAs in the Henry Mountains which are recommended as suitable for wilderness designation" and "wilderness designation could preclude future habitat manipulation projects which would benefit wildlife." What is not stated is that the "vegetation manipulation projects" would primarily benefit cattle. Twice the IBLA told BLM to reevaluate this area and still BLM clings to its indefensible position. [Owen Severance]

**42.20 RESPONSE:** An area's eligibility for designation as a wilderness area is dependent on whether or not it possesses the mandatory wilderness characteristics of size, naturalness, outstanding opportunities for solitude, or a primitive and unconfined type of recreation. BLM reevaluated the information and analyses and has included the 25,800-acre Partial Wilderness Alternative as part of the Proposed Action for wilderness. The EIS indicates that there is an area of potential revegetation within the WSA. However, this project is currently not proposed, as noted in the response to Specific Comment 42.2. The vehicular access routes in the west portion of the WSA (about 51.1 miles of travel routes), with the resulting configuration of a 3,400-acre tract surrounded by intrusions, do not add to the naturalness or the outstanding primitive or unconfined recreation value. Also,

see the responses to Specific Comments 36.30, 42.8, and 42.15.

**42.21 COMMENT:** Mt. Pennell, 143,000 acres, is obviously all wilderness quality. I cannot imagine how extensive foliage reconstruction to improve cattle grazing can possibly be considered cost effective for the U. S. Treasury. Thus, the proposed forest removal cannot seriously be considered a viable issue that would prevent Mt. Pennell from being considered for wilderness. I believe that the congressional mandate to consider for wilderness designation those areas where the impacts of man have gone substantially unnoticed certainly must apply perfectly to Mt. Pennell. [Charles Bagley]

**42.21 RESPONSE:** Range developments such as pinyon-juniper chaining can be cost effective and beneficial. Cost and benefit evaluations are done before such range projects are carried out. Vegetation treatments may use more than one technique and may be of value for wildlife and watershed purposes, as well as for livestock forage. The potential 1,200-acre vegetation treatment area in the Mt. Pennell WSA has not been used to eliminate the area from consideration for designation and would in fact be precluded with the Partial Wilderness Alternative which is BLM's Proposed Action.

**42.22 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the earlier proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**42.22 RESPONSE:** See the response to Specific Comment 36.13.

**42.23 COMMENT:** Mt. Hillers, a lower peak than Mt. Pennell, has bristlecone pine on its north slope. It would seem that Mt. Pennell's slopes would also

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

include such trees, but it is not mentioned. [Michael Salamacha]

**42.23 RESPONSE:** Bristlecone pine is not known to exist on Mt. Pennell. Elevation is not the only controlling factor to the location of bristlecone pine, as other edaphic parameters are necessary.

**42.24 COMMENT:** Studies to determine the extent of endangered plant species within the WSA need to be undertaken. [Kim Jennyson]

**42.24 RESPONSE:** The analysis for each WSA provides information relative to threatened, endangered, and other special status species. Also, Appendix 4 in Volume I lists the species potentially in the respective areas according to the FWS. For the analysis in the EIS, it is not necessary to conduct additional and extensive field surveys of threatened and endangered plants. The presence or absence of threatened, endangered, or sensitive plants is not a major determining factor on an area being proposed as wilderness since threatened or endangered species are protected, in any case, by the Endangered Species Act as amended. Such plants are considered to be a supplemental or special feature in the EIS text on wilderness values. Also, see the responses to General Comments 9.6 and 13.5.

**42.25 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The five WSA areas, including Mt. Pennell, in the northeast portion of Garfield County and the southern portion of Wayne County are situated in the Henry Mountain Basin. Although some of these areas are partially associated with Tertiary age intrusives, they all still have potential for hydrocarbon production. These Henry Mountain Basin areas are unexplored. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**42.25 RESPONSE:** See the response to Specific Comment 39.16.

**42.26 COMMENT:** Why is there such a feeble description of oil and gas? (This inadequacy is particularly common throughout Volume IV.) Are there any favorable structures or strata present? Is there a history of drilling? [Brian Wood]

**42.26 RESPONSE:** The EIS reflects the information and estimates available from existing exploration data and from geologic indications. Drilling in the Henry Mountain region has not been extensive.

**42.27 COMMENT:** The Mt. Pennell WSA analysis indicates that recovery of 3 million barrels of oil, 18 billion cubic feet of gas, 25 tons of gold, 500 tons of silver, 50,000 tons of copper, and 12.3 million tons of coal would be foregone under the "All Wilderness Alternative"; even though potential for oil and gas is low; gold, silver, and copper are uneconomical to develop; and surface mining of the coal would be precluded (the field is currently designated unsuitable for mining due to bison conflicts). On the other hand, the logical reverse assumption for the loss of wilderness values is not presented. Volume IV states that under BLM's preferred alternative 31,000 acres (42 percent of the WSA) of existing oil and gas leases could be developed in the area not designated as wilderness. Yet, the Summary Table 1 allows that wilderness values could be lost on a mere 0.1 percent of the WSA (75 acres!). It is inconsistent to use the maximum quantities when discussing mineral impacts and the minimum possible when presenting wilderness aspects. [Joelle Buffa]

**42.27 RESPONSE:** The minerals information assumptions and analysis have been reviewed and revised for the Final EIS. See the responses to General Comments 9.4, 9.10, and 15.20.

**42.28 COMMENT:** There is a very poor quality geologic explanation of the area. An inadequate description of the area surrounding Mt. Pennell was given; no accurate description of the vastness of the deep canyons, the gently dipping sedimentary rocks, or re-treating escarpments was given. [Kim Jennyson]

**42.28 RESPONSE:** Additional geologic and topographic information has been added for the Final EIS.

**42.29 COMMENT:** The Henry Mountains coal field has too many environmental limitations to make it feasible as a coal mining district: in addition to scarce surface and groundwater supplies necessary for operations and reclamation, the arid climate and thin or nonexistent shale-derived soils pose severe reclamation difficulties. Additionally, the bison herd on Mt. Ellen presents special problems. [Utah Wilderness Coalition]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

**42.29 RESPONSE:** The coal study has determined that 12.3 million tons of coal on 1,270 acres would remain unsuitable for leasing due to the potential conflicts with crucial critical bison range. The development of coal has not been projected for the Final EIS.

**42.30 COMMENT:** In the description of geology, the relationship between intrusive and sedimentary rocks is unclear. Why not state that the Henry Mountains are examples of laccolithic and attendant types of intrusives. Also a good geological description should, at least, include the age range of surface rocks, lithological types, and an overview of intrusives types. This geological sections is actually a geomorphic or a physical geographic description. [State of Utah]

**42.30 RESPONSE:** Additional geological information has been added in the Final EIS.

**42.31 COMMENT:** For coal, the 12-30 million tons of stripable reserve is an inferred strip reserve. Is there also an inferred underground mine reserve? No mention of one is made in this section. [State of Utah]

**42.31 RESPONSE:** According to available information, there are areas within the WSA where the Emery coal zone is under 200 feet of overburden. However, with the limited drilling information available, no assessment can be made of potential underground mining reserves.

**42.32 COMMENT:** The only stated resource is coal. That coal is in a highly inaccessible area, and it has been overstated as to the applicability of resource development. [William Russell]

**42.32 RESPONSE:** No coal development has been projected for the Final EIS.

**42.33 COMMENT:** Inadequate information was given for potential uranium mines and the location of these mines. [Kim Jennyson]

**42.33 RESPONSE:** Additional information has been included in the Final EIS.

**42.34 COMMENT:** For locatable minerals, the fact that cabins have been erected on mining claims, whether they have been built for assessment work or other purposes, serves no purpose in an EIS and does not provide any useful information concerning the locatable minerals resource. [Agency comment]

**42.34 RESPONSE:** Information concerning cabins has been removed from the minerals section of the Final EIS.

**42.35 COMMENT:** There are some 15 WSAs that have been totally eliminated and many more reduced in size for apparent mineral conflict. I give as an example the Mt. Pennell WSA. According to the figures given in Volume I and the Mt. Pennell analysis, the estimated coal reserve in this WSA is but 0.2 percent of Utah's estimated reserve, and only 0.002 percent of the nation's reserve. Other minerals are judged to be low in favorability. Here also is an area that has excellent opportunities for primitive recreation, is already largely natural, and contains crucial habitat for bison and deer. I presume that these important attributes have been weighed against the miniscule coal reserves and been found wanting. It would seem that personal opinion took precedence over fair evaluation of trade-offs in this and many other WSAs. [John Reeves]

**42.35 RESPONSE:** See the response to Specific Comment 42.10.

**42.36 COMMENT:** The recommended portion of the Mt. Pennell WSA is the only portion with potential for mineral development, according to the Draft EIS. Given the past history of this area (zero acres recommended at scoping), we believe that BLM has recommended this particular parcel (25,800 acres) with mineral conflicts, and eliminated the other part, so that comments will reflect the mineral potential (even though this is low), and these comments can then be used to justify dropping even this 25,800 acres from wilderness consideration. [Tim Graham]

**42.36 RESPONSE:** The 25,800-acre Partial Wilderness Alternative is BLM's Proposed Action for the Final EIS.

**42.37 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration: historic past production of uranium, vanadium, copper, and gold. [Utah International, Inc.]

**42.37 RESPONSE:** The mineral resource potential of the Mt. Pennell WSA has been reevaluated by BLM in light of new information (refer to the Mineral and

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 42: MT. PENNELL WSA (CONTINUED)

Energy section of EIS). Based on this evaluation, it has been determined that there are small deposits of the minerals mentioned and locatable mineral exploration would occur. However, BLM projects further exploration, but does not project mineral development to occur because the deposits are too small and uneconomical to develop in the foreseeable future.

**42.38 COMMENT:** The Mt. Pennell area is valuable to nonconsumptive wildlife species. Wildlife species in this unique WSA range from desert to subalpine, thereby lending itself to extraordinary research opportunities. [Martin Bray]

**42.38 RESPONSE:** The diversity of the flora and fauna is reported in the EIS.

**42.39 COMMENT:** Inadequate information was given as to the wildlife in the area; small mammals, lizards, birds, snakes, nongame large mammals, raptors, and small species were not mentioned. [Kim Jennyson]

**42.39 RESPONSE:** Refer to the response to Specific Comment 37.14.

**42.40 COMMENT:** Bison projects are stated as a conflict, but the Draft EIS also states that no projects "exist in the unit and none are proposed." [James Hughs]

**42.40 RESPONSE:** See the response to Specific Comment 42.2.

**42.41 COMMENT:** Bison projects are identified as conflicts to justify nondesignation of this WSA. The Draft EIS states that "No wildlife management facilities exist in the unit and none are proposed" (page 17). That is quite forthright. On page 27 the Draft EIS reads: ". . . there is sufficient forage in the WSA to meet current (bison) needs . . .," and then goes on to explain why a proposed 1,200 acre chaining on the southwest side of Mt. Pennell would be important to the bison. It is obvious that this chaining was designed to benefit livestock--not bison. Seventy percent of the increased AUMs resulting from this chaining would be officially allocated to livestock, but, in addition, the Draft EIS admits that: "The actual balance of use that would result between livestock, deer, and bison is unknown" (page 24). In other words, stockmen could usurp the entire "improvement" and quite possibly the bison would not use it anyway. Bison management is not incompatible with wilderness, but there

are different ways to go about it. I suggest that you get in touch with the friendly folks up at Yellowstone National Park. [Scott Delong]

**42.41 RESPONSE:** The purpose of the EIS analysis is to identify present and potential uses in order to provide a basis for decisions. The vegetation and soil inventory identified 1,200 acres as having good potential for a vegetation treatment project. Although there may be suitable bison and livestock forage in the Mt. Pennell WSA, there is a shortage in other areas, thereby affecting management concerns for the bison habitat as a whole. If additional forage could be provided in one location, grazing pressure elsewhere may be reduced. The statement that "The actual balance of use that would result between livestock, deer, and bison is unknown" was made because the wildlife use patterns may vary, to some extent, from year to year. Forage determinations on a grazing allotment basis are made through the land use plan, which receives public input. In the past, BLM has invited and received consultation from biologists and others familiar with bison management, including those from Yellowstone National Park. For example, the following specialists have visited the Henry Mountains with BLM to discuss bison management: Dr. Mary Meagher, Research Biologist, Large Animals, Yellowstone National Park; Mr. Marvin Kasky, Superintendent of the National Bison Range, near Missoula, Montana; Dr. Dale Lott, Lead Scientist, Bison Behavior, Catalina Island, California, University of California at Davis; Mr. Bill Babcock, Big Game Biologist, Animal Behavior and Food Preference, Utah Division of Wildlife Resources, Eastern Region.

**42.42 COMMENT:** There are serious questions about the viability of this "proposed" project that is being used to find Mt. Pennell unsuitable for wilderness. There is no discussion of the economic viability of the chaining and indeed, the Draft EIS states, "No projects for wildlife habitat enhancement have been specifically identified." Failure to designate the WSA as wilderness could lead to a total loss of the wilderness environment (page 25). There is no discussion of the impacts this could have on the bison, mule deer, and mountain lion populations. Certainly the negative impacts of this would far outweigh any benefits of the "proposed" chaining. [Utah Wilderness Association]

**42.42 RESPONSE:** A potential for an increased forage production on 1,200 acres has been identified. A specific (or detailed) vegetation treatment project has not been formulated. Prior to undertaking any

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

such project, there would be an economic cost/benefit determination and a specific environmental analysis conducted. This would only be done should Congress select the No Action/No Wilderness Alternative. The analysis of the No Action/No Wilderness Alternative in this wilderness EIS conceptually addresses impacts which could result from a chaining project. Impacts to bison, mule deer, and mountain lion populations would be positive due to additional forage and "edge" effect produced. Though "chaining" may cause adverse impacts to certain other resources, BLM has determined that any adverse impacts to wildlife would be temporary and insignificant.

**42.43 COMMENT:** All impacts mentioned in the No Action/No Wilderness section are relative to bison and/or deer. This game orientation, which is inadequate and biased, is especially obvious in many of the Volume IV WSAs. [Scott Mills]

**42.43 RESPONSE:** See the response to Specific Comment 36.23.

**42.44 COMMENT:** It is highly unlikely that bison, mule deer, or mountain lions will tolerate the disturbances created by mining in the Mt. Pennell WSA. The animals will avoid the mining area and undoubtedly will not use a large buffer area around the site. I have watched bison on numerous occasions run 3-5 miles after having an encounter with one person on foot showing their low tolerance for disturbance. Mining activity will increase human disturbance perhaps to intolerable levels. The area of conflict will occur on wildlife winter range where animals need to conserve energy and disturbance should be minimized. Because even under the best winter range conditions, big game animals lose weight due to cold temperatures and low energy diets. Therefore, the additional stress brought on by mining activities can affect the reproductive processes of these animals and increase mortality rates. [Martin Bray]

**42.44 RESPONSE:** With the No Action/No Wilderness Alternative, there could be approximately 57 acres of surface-disturbing activities related to future mineral development in the foreseeable future. Impacts would be concentrated in the northeastern portion of the WSA, and it is likely that bison or other wildlife would tend to avoid this area (or to some degree become accustomed to the routine activities). It is possible that a hiker, who may represent a non-routine encounter covering many parts of the WSA,

would cause more disturbance to bison than the localized and recurring mining activity. Tolerance and behavior of bison is uncertain and may vary considerably. Many people have observed bison running 3 to 5 miles apparently without being disturbed at all. Furthermore, on occasion, bison have been reluctant to run from a person even encouraged by shouting, arm waving, or other means.

**42.45 COMMENT:** The statement that "The current number of bison using this area is estimated at 200 animals" is out of date and quite incorrect. The entire bison herd uses the Mt. Pennell WSA, and the most recent accurate count in 1983 shows 343 bison in the herd. This information will be published this month in the Journal of Mammalogy. A copy of the proofs of this paper is enclosed. It should be cited as follows: Van Vuren, D., and M. P. Bray. 1986. Population dynamics of bison in the Henry Mountains, Utah. J. Mammal. 67:503-511. [Dirk Van Vuren]

**42.45 RESPONSE:** The figure of 200 bison represents the average number of adult animals present at the end of the hunting season. An adult animal is about 3 years old. Calves and yearlings are in addition to the number of adults. The meaning of the number has been clarified in the Final EIS. The total for August 1986 was 365 bison which includes yearlings and calves. There were 45 hunting permits issued for 1985 and 56 hunting permits authorized for 1986. Considering wounding and natural mortality loss, the final count is close to the figure of 200 adult bison. See the response to Specific Comment 42.2.

**42.46 COMMENT:** The statement ". . . bison numbers (approximately 200 presently) . . . would be expected to remain static . . ." is false, unfounded, and should be changed. First of all, there are far more than 200 bison (see the enclosed Van Vuren and Bray, 1986). Second, Van Vuren and Bray (1986) have shown that the herd has been increasing exponentially for many years. To state, without justification or data, that the herd will remain static, is absurd. Read the conclusion of Van Vuren and Bray (1986) to get our ideas about future herd size. [Dirk Van Vuren]

**42.46 RESPONSE:** Refer to the responses to Specific Comments 42.2 and 42.46. There is no reason to expect that the herd size cannot be managed at the target figure of about 200 adult animals. The conclusion that bison numbers would be expected to remain static is based on the existing management agreement between Utah Division of Wildlife Resources and BLM.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

Although this agreement could be changed sometime in the future, it currently is the management goal and the best information available for use in the EIS.

**42.47 COMMENT:** The statement "Based on the assumption that bison are evenly distributed throughout this range . . . , the loss of 210 acres . . . would reduce the carrying capacity for the bison population by one or two animals . . ." is based on a totally false assumption and should be omitted from the EIS. Indeed, the opposite is true and should be addressed in the EIS. Let me elaborate. This WSA includes most of the bison winter range. Significant disturbance in this area could easily result in bison abandoning their entire winter range (they did it once before in 1965); this threat and its reduction by wilderness classification should be addressed. More important, bison have only two very restricted access routes to their winter range; they lie close together, and both are entirely within the WSA. Even a small disturbance, seemingly trivial to us, could block off these two routes and result in abandonment of the entire winter range by the herd, with serious environmental consequences for the bison herd, livestock elsewhere, and the range. This impact should be addressed, since wilderness classification will reduce the chances of it occurring. [Dirk Van Vuren]

**42.47 RESPONSE:** See the response to Specific Comment 36.27.

**42.48 COMMENT:** Another error concerning this WSA is that it was omitted from the list of WSAs adjacent to National Parks. The common border area includes suitable habitat for desert bighorn sheep; sheep transplanted in 1984 into Capital Reef National Park used this area (Swap Canyon and Swap Mesa) for a time after release. This region of Capital Reef is being considered for future sheep reintroductions, and wilderness designation of the entire Mt. Pennell WSA would enhance the quality of the bighorn habitat. [Tim Graham]

**42.48 RESPONSE:** The Mt. Pennell WSA is adjacent to a National Park WSA for approximately 3 miles. This was inadvertently left off the table and text of Volume I. This has been corrected. There are no plans to introduce bighorn sheep into the WSA.

**42.49 COMMENT:** Please consider the following regarding the Mt. Pennell area. This WSA must receive wilderness protection for the bison range potential. The 1,200-acre project area as proposed by BLM is

too small. Most of this WSA can and should be set aside for this important native wildlife project. The area has provided important primitive recreation for rock climbing activities for years. Mt. Pennell has tremendously diversified ecological zones. Numerous high quality scenic views are present which add to local integral vistas. [Sierra Club, Cache Group]

**42.49 RESPONSE:** With BLM's Proposed Action, the Wilderness Management Policy would preclude the opportunity for the 1,200-acre pinyon-juniper chaining and seeding. The area cannot meet the requirements for wilderness management and at the same time be used for projects that would disturb wilderness values. Rock climbing, ecological diversity, and scenic values would be compatible with wilderness designation.

**42.50 COMMENT:** Climbing to the peak of Mt. Ellen and Mt. Pennell, I was pleasantly surprised to find the spectacular views of Lake Powell, Oyster Shell Reef, and the surrounding desert. I believe that their recreational value is high and should be spared. Also, because of their unusual geology, the Henry Mountains may be used as a "classroom" for geological studies. The Henry mountains can be a learning experience. [Allent Lea]

**42.50 RESPONSE:** See the response to Specific Comment 36.36.

**42.51 COMMENT:** Skiing is one activity BLM overlooked. It's outstanding. [Utah Wilderness Coalition]

**42.51 RESPONSE:** Mt. Pennell has opportunities for cross-country skiing. However, the long travel distance to the mountain from population centers and the difficult local access during the winter months make the importance of this activity insignificant for most skiers in Utah. Many alternative cross-country skiing locations are available closer to population centers. Therefore, this activity was rated as less than outstanding at Mt. Pennell.

**42.52 COMMENT:** We disagree with BLM's finding that parts of this WSA contain no solitude or primitive outdoor recreation opportunities. The entire area clearly has outstanding opportunities for primitive outdoor recreation, especially for rock climbers, and solitude within a natural setting that clearly outweighs any potential development plans and values. [Sierra Club, Cache Group]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

**42.52 RESPONSE:** In the western portion of the WSA, opportunities for solitude are less than outstanding because the terrain is relatively flat and the vegetation is too sparse to provide screening. The presence of numerous roads and ways detract from the opportunities for solitude. Overall, these factors indicate that opportunities are less than outstanding on 56,500 acres in the western portion of the WSA.

**42.53 COMMENT:** BLM provides no map showing the location of the intrusions. Our field investigation has shown that there are not 29 miles of roads in this area. BLM needs to provide evidence that these routes were constructed and maintained and receive regular use for a specific purpose. We believe that BLM has falsely evaluated the naturalness of this area. We request that this information be made part of the BLM EIS. [Utah Wilderness Coalition]

**42.53 RESPONSE:** See the responses to Specific Comments 42.4, 42.5, 42.8, and 42.16.

**42.54 COMMENT:** The claim that 50,000 acres of contiguous roadless terrain lacks outstanding opportunities for solitude is simply absurd, and an indication that whoever made that recommendation has never visited the area. To state that there are no outstanding opportunities in the 40,000-plus acres of badlands, mesas, and canyons south and west of Mt. Pennell is shocking. How can BLM continue to make such an argument after the IBLA reversal? There is nothing in the analysis to support BLM's claim except a continued over-emphasis on screening that was rejected by IBLA. The Draft EIS says there are no outstanding opportunities in the Muley Creek drainage and south of Swap Mesa and Cave Flat because of flat terrain without screening. There is no mention of size and configuration. This is in violation of BLM regulations and the IBLA decisions. How can BLM justify its claim that there are no outstanding opportunities in some of the most rugged and scenic badlands in the United States? [Utah Wilderness Association]

**42.54 RESPONSE:** See the responses to Specific Comments 42.8 and 42.14.

**42.55 COMMENT:** BLM does find "adequate screening" on Swap Mesa and Cave Flat but says there are no outstanding opportunities due to numerous roads and ways. There has been no vehicle access to the roads/ways on Swap Mesa for a least 6 years. The April 1980 Utah Proposed WSA decisions said access was prohibited by the Park Service. They are certain-

ly substantially unnoticeable in the context of the WSA. They could not be seen from the rim of Tarantula Mesa in the summer of 1985. The way on Cave Flat winds through pinyon-juniper and is substantially unnoticeable in the context of the WSA. [Utah Wilderness Association]

**42.55 RESPONSE:** The road on Swap Mesa is not closed. The road to Cave Flat is far from "substantially unnoticeable" as it receives constant travel by hunters and other users of the public lands. See the responses to Specific Comments 42.4 and 42.8.

**42.56 COMMENT:** The Draft EIS states that "most of the eastern portion . . . is in a completely natural condition. Overall, 71,000 acres of the WSA appear natural." I would also add that the additional acreage proposed by the UWC in Spring, Fivemile, Swap, and Divide Canyons is also largely untouched by man--- and is also adjacent to the proposed Capitol Reef National Park wilderness. These areas richly deserve inclusion in any complete Mt. Pennell wilderness area. The Draft EIS assertion that a few lightly traveled and primitive ORV trails eliminate the chances for solitude in the area is utterly absurd. Most could easily be closed off and allowed to be reclaimed by nature. The Draft EIS lists this WSA for the Manageability Alternative. One of the criteria for inclusion on this list is that the WSA may not "include . . . open terrain features that allow unrestrained use by ORVs in spite of efforts to enforce closure." [Scott DeLong]

**42.56 RESPONSE:** According to the inventory, those areas mentioned do not meet the specified criteria for inclusion in the proposed WSA. In the western portion of the, opportunities for solitude are less than outstanding. For example, in the Muley Creek drainage and in the area south of Swap Mesa and Cave Flat, the terrain is relatively flat and the vegetation too sparse to provide screening. There is adequate topographic and vegetation screening in the Swap Mesa and Cave Flat areas, but the presence of numerous roads and ways detract from the opportunities for solitude. Overall, these factors considered together indicate opportunities for solitude are less than outstanding in the western portion of the WSA.

**42.57 COMMENT:** The EIS states that the western portion (Cave Flat/Swap Mesa) of the WSA ". . . does not offer outstanding opportunities (for solitude) . . . because the terrain is relatively flat and vegetation is too sparse to provide screening." The EIS refers to "numerous roads and ways," and states that

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 42: MT. PENNELL WSA (CONTINUED)

opportunities in this area for primitive and unconfined recreation are not outstanding. I find this assessment to be incomprehensible and utterly bizarre not to mention patently false. I base this opinion on my personal experience with the Mt. Pennell WSA in comparison with my extensive experience in other designated wildernesses; I have been hiking, backpacking, and canoeing for 15 years, and I have visited over 40 designated wildernesses. I will elaborate on this opinion by covering four topics: naturalness, solitude, primitive and unconfined recreation, and special features.

**Naturalness:** The entire Mt. Pennell WSA, particularly including the western portion, is in a state of virtually total naturalness; certainly more so than any other wilderness I have been in. Signs of any human presence ever consist of the following: 1) two ways, one down Bullfrog Creek to Cave Flat, and one up Swap Canyon. Neither has been maintained for many years, passage down either requires a rugged four-wheel-drive vehicle, and both have been so obliterated by shifting sand that in most places you must be standing on them to recognize the remnants of an old road. There are no roads in the Mt. Pennell WSA. 2) An old airstrip on Cave Flat which has been so eroded and covered with vegetation that it is no longer recognizable as an airstrip. 3) A decayed log gate which is now a pile of logs. 4) About one-half dozen rusted tin cans. The remainder of the WSA is totally natural. In fact, not only do I consider naturalness of the entire WSA to be outstanding--I consider it to be extreme.

**Solitude:** The solitude of the entire Mt. Pennell WSA is simply awesome. The hiker is acutely--even frighteningly--aware of the extreme isolation of the area. The nearest inhabited dwelling is 25 airline miles distant, through some extremely rugged terrain. Names like Cave Flat and Swap Mesa suggest flat terrain. Nothing could be further from the truth. The slopes of Mt. Pennell are extremely rugged, cut by deep canyons; the supposedly "flat" terrain to the west is anything but. Rather the Cave Flat/Swap Mesa area is a confusing maze of deep twisting canyons, rims, cliffs, draws, and swales. Scarcely anywhere in the entire WSA could be considered "flat." Topographic screening is, in summary, outstanding. In addition, most of the WSA is covered by a pinyon-juniper woodland which provides highly effective vegetation screening. The combination of vegetation and topographic screening creates an almost overwhelming feeling of total isolation; a passing hiker is swallowed within 100 yards. I can illustrate the extreme

isolation and solitude of the Cave Flat/Swap Mesa area with experience from my bison research. Several times I entered the area looking for bison; even though tracks and feces told me I was practically on top of a herd, I never actually saw them until I was actually among them. This area is very difficult for observing bison unnoticed, precisely because of the extreme topographic and vegetative screening. Bear in mind, I was trying to find a group of 1,500-pound animals, but couldn't until I was among them. Imagine how easily one or few 160-pound humans would be swallowed by the terrain. Almost immediately!

To further illustrate this point, I and two friends explored the forks of Swap Canyon several years ago. We each picked a different fork. We each hiked all day and never passed the same place twice. None of us ever saw another human all day--yet all three of us spent the entire day within a 400-acre area. How many designated wildernesses possess such solitude and isolation that three people can hike separately all day in a 400-acre area and never see each other?

In summary, the opportunities for solitude in the Mt. Pennell WSA, particularly the western portion (Cave Flat/Swap Mesa), range from outstanding to extreme.

**Primitive and unconfined recreation:** The area offers a maze of bison trails, old cattle trails, deer trails, and often no trails at all, just endless canyons. A well-equipped backpacker could easily spend a week in the area and never see the same place twice. There are a number of outstanding dayhikes--I have done many of them--which, after a 2-hour walk, bring the hiker to a waterfall, or a spectacular canyon, or a beautiful view. The best areas are Pipespring Canyon, the slopes of Mt. Pennell, Bullfrog Canyon, Muley Canyon, Swap Canyon, and the rim of Cave Flat. Geologic sightseeing and photographic opportunities throughout the entire WSA are almost overwhelming--I have hundreds of color slides to attest to this. I have also taken advantage of excellent opportunities for cross-country skiing in the WSA (Mt. Pennell), and have several times ridden a horse from Cave Flat to Swap Mesa, up Pipespring and Scratch Canyons, and down Swap Canyon. Unquestionably, this is the most exciting opportunity for horseback riding I have ever encountered. Finally, opportunity for observing wildlife is excellent. Besides bison, I have frequently seen coyotes, bobcats, deer, abundant mountain lion sign, and incredibly diverse bird life (such as eagles,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

peregrine falcons, a nest full of baby Cooper's hawks, and a long-eared owl).

Special features: The EIS omitted two truly outstanding special features present in the Mt. Pennell WSA: 1) two beautiful waterfalls, one of them 80 feet high, fed by year-round streams (one is at the head of Muley Creek, the other on Bullfrog Creek); and 2) a series of absolutely breathtaking canyons along Pipespring and Bullfrog Creeks, near the confluence. I have seen every famous canyon in the U.S. and these totally unknown canyons are among the most spectacular. These canyons would be a magnetic tourist attraction and recognized as a State or National Park if they were located in any other State besides Utah--they are that dramatic.

I will summarize by stating that because of the near total naturalness of the entire Mt. Pennell WSA; because of its truly outstanding opportunities for solitude, and primitive and unconfined recreation; and because of its many special features, including canyons, waterfalls, geologic landmarks, rare wildlife (the Henry Mountains bison herd is one of just four free-roaming herds in the 48 States), and vegetation which ranges from desert to subalpine and everything in between (such a breadth of vegetation zones in one wilderness area is virtually unknown in the wilderness system), I urge, in the strongest terms that the entire Mt. Pennell WSA be recommended for wilderness classification.

If anyplace in the U.S. deserves wilderness classification, the Mt. Pennell WSA deserves it. If you doubt my views, go visit it yourself--you will come away wondering, as do I, "What possible reason is there not to recommend the entire WSA on the strongest terms?" [Dirk Van Vuren]

**42.57 RESPONSE:** While opportunities for primitive recreation exist in parts of the WSA, the WSA as a whole is not outstanding. While the roads mentioned in the comments are rough and often may require 4-wheel drive vehicles for passage, they are well established and compare to many back country roads. BLM disagrees with the commentor regarding the interpretation of the word "outstanding." For example, the entire Cave Flat area is a crested wheatgrass seeding. This type of broad treatment with an introduced plant species is incompatible with "outstanding" wilderness qualities.

**42.58 COMMENT:** The BLM never addresses wildlife as a true financial asset to the local community or the State. Bison and mule deer hunters contribute to the local economy in various ways (guide services, hotel rooms, food, gas, ammunition, etc.). So it should be recognized that these hunters are a reliable source of revenue year after year; whereas mining has a historical record of boom and bust economics. [Martin Bray]

**42.58 RESPONSE:** The EIS does address the economic aspects of outdoor recreation, including hunting. BLM recognizes that revenues brought into communities by tourists, recreationists, and hunters can contribute to the local economy, at least on a seasonal basis. Even though the wildlife-related economic benefits may occur in the WSA, they generally are not sufficient for any one location to be a major factor in the rationale for the wilderness Proposed Action. Further, wilderness designation may be advantageous to some wildlife species and adverse to others. Also, wilderness designation may reduce traditional vehicular access by hunters on existing travel ways. On the whole, wildlife economics are not considered to be a significant factor, and are expected to be approximately the same with any of the alternatives analyzed for the Mt. Pennell WSA.

**42.59 COMMENT:** BLM seems to be confused in dealing with this WSA since in Volume I, the proposed alternative is given as "No Wilderness," but in the WSA analysis in Volume 4 the Proposed Action is "Partial Wilderness." [Anthony Williams]

**42.59 RESPONSE:** See the response to Specific Comment 42.13.

**42.60 COMMENT:** I will never be convinced that the change from a "Proposed Action" of Partial Wilderness in Volume IV for both French Spring-Happy Canyon WSA and Mt. Pennell WSA to a No Action/No Wilderness Alternative "Proposed Action" in Volume I was merely a typographical or editing error. Since the "Proposed Action" labeling is consistent throughout both WSAs in Volume IV, it is obvious that these recommendations were changed at the last minute for political reasons. BLM won't explain this change for obvious reasons. It is unfortunate that the public will not be able to see or comment on the future progress of the EIS until it is too late to help BLM see "the error of its ways". [Owen Severance]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 42: MT. PENNELL WSA (CONTINUED)**

**42.60 RESPONSE:** See the responses to Specific Comments 40.4, 42.13, and General Comment 25.18.

**42.61 COMMENT:** The fact that the Mt. Hillers WSA (UT-050-249) abuts the Mt. Pennell WSA at Section 31, Range 11 East, Township 33 South, is never even mentioned. Mt. Pennell and Mt. Hillers WSAs should be connected if possible--all that seems to stand in the way is a State section on the west side of Mt. Hillers. [Michael Salamacha]

**42.61 RESPONSE:** The proximity of Mt. Hillers WSA and Mt. Pennell WSA has been noted in the Introduction to each of those two individual WSA sections of Volume IV. This also is portrayed on the Statewide maps in Volume I. Although the boundaries of Mt. Hillers and Mt. Pennell do come close together, they are separated by the Stanton Pass road. Roads are used as boundaries for many of the WSAs; therefore, even if the intervening State section were to be exchanged, the two WSAs still would be separate and each must be separately evaluated.

**42.62 COMMENT:** Why is Capitol Reef National Park, which is adjacent to the west boundary of the WSA, not clearly indicated on the map or noted in the Draft EIS except in one passing remark under Air Quality? ". . . Capitol Reef National Park along the west boundary of the WSA is a Class I area. Visibility is generally excellent." I would think that the presence of a National Park along one boundary of the WSA would have some significance in deciding the worth of the WSA as a wilderness. At the least it should be clearly marked on the maps, which it isn't, and mentioned more importantly in the text. [Michael Salamacha]

**42.62 RESPONSE:** Since the WSA is larger than 5,000 acres, its proximity to Capital Reef National Park has little special bearing on its qualifications as wilderness. The consideration of adjacent lands and uses should be noted in development or wilderness analyses. Omission of the park from the WSA map and from the introductory text was in error and has been corrected. See the response to Specific Comment 42.48.

**42.63 COMMENT:** Map 3: Map 3 shows the proposed partial alternative. This is inconsistent with BLM Proposed Action Pocket Map which shows the No Action/No Wilderness Alternative to be the preferred alternative. According to the Federal Register Notice, the No Action/No Wilderness Alternative is the Pro-

posed Action. This map needs correction. [State of Utah]

**42.63 RESPONSE:** The maps have been revised to be consistent. See the responses to General Comment 25.17 and Specific Comment 42.13.

**SECTION 43**  
**MT. HILLERS WSA**

**43.1 COMMENT:** Mt. Hillers is ranked as having moderate to low wilderness values and moderate to low conflicts relative to other WSAs in the region. Important wilderness and wildlife values are present as well as conflicts with potential uranium and water resources. Livestock conflicts could be reduced by moving the boundary on the south end near Star Springs a 0.5 mile to the north so that it runs along the section line. This would move the boundary off the alluvial slopes where most of the grazing occurs. [State of Utah]

**43.1 RESPONSE:** The suggested boundary change has been made for the Partial Wilderness Alternative.

**43.2 COMMENT:** During the wilderness study, an operator hoping to build a housing development near Ghost Ridge bulldozed a track into the WSA. BLM is aware of this. Our members had communication with the Hanksville office of BLM that verified this. Since then, a pipeline to a spring has been proposed. Part of this would be in the WSA. BLM has not responded to our requests for information on these. We request a full description of interim management problems for this area. Clearly, some of the deletions from wilderness suitability are areas that have had actions occur since 1976. We request a map which shows the location of these impacts and a written description of the history of the action, its current status, and the effect the impact has on the wilderness values of the area. [Utah Wilderness Coalition]

**43.2 RESPONSE:** Actions taken in the WSAs and their effects are discussed under the Naturalness heading in the Description of the Affected Environment.

**43.3 COMMENT:** The WSA boundaries should not be section lines. [Utah Wilderness Association, Randolph Jorgen, et al.]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 43: MT. HILLERS WSA (CONTINUED)**

a. The partial alternative recommended cuts along arbitrary section lines rather than following true distinctions of terrain or quality.

b. I see no reason to eliminate the lower slopes from BLM proposal as was done in the EIS. These slopes comprise part of the major land form (Mt. Hillers) and the straight lines used by BLM in their proposal make no sense ecologically, recreationally, geologically, or geographically. It appears to be another symptom of cartographic convenience as opposed to good management.

c. We do not agree with the decision to eliminate 3,000 acres of the "foothill fringe areas" from the suitable recommendation. The topographic boundaries of these "fringe" areas are superior to the straight line boundaries of the Partial Wilderness Alternative. Also, BLM's criteria for defining outstanding opportunities for solitude is belied by the recommendation, since size is an important component of the definition and the Proposed Action reduces the size of the wilderness, not increases it. Conflicts should be used to find parts of WSAs unsuitable and not highly subjective and questionable determinations of outstanding opportunities.

**43.3 RESPONSE:** Boundary determinations were made with considerations of manageability and delineation of those areas having mandatory wilderness characteristics. BLM's Proposed Action includes the steepest and most mountainous portions of the WSA. The "foothill fringe areas" were found not to have outstanding opportunities for solitude and unconfined and primitive recreation and therefore are not proposed for wilderness designation. Also, see the response to General Comment 3.43.

**43.4 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the earlier proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect

and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**43.4 RESPONSE:** See the response to Specific Comment 36.13.

**43.5 COMMENT:** This WSA has important aspen and bristlecone pine communities which require preservation for wildlife and scientific use. [Sierra Club, Cache Group]

**43.5 RESPONSE:** The presence of aspen and bristlecone pine within the WSA is noted under the vegetation heading in the Description of the Affected Environment.

**43.6 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The five WSA areas, including Mt. Hillers, in the northeast portion of Garfield County and the southern portion of Wayne County, are situated in the Henry Mountain Basin. Although some of these areas are partially associated with Tertiary age intrusives, they all still have potential for hydrocarbon production. These Henry Mountain Basin areas are unexplored. We have leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**43.6 RESPONSE:** See the response to Specific Comment 39.16.

**43.7 COMMENT:** The Geology section is incomplete. [State of Utah and Kim Jennyson]

a. In the Geology section, no mention is made of sedimentary formations present or of igneous rock types.

b. There is inadequate geologic description; no mention of the types of rocks surrounding Mt. Hiller exists. No description of Black Table exists. The deeply cut sandstone canyons on the north side of Mt. Hillers are not even mentioned.

**43.7 RESPONSE:** The Geology and Topography section has been expanded to include this information.

**43.8 COMMENT:** Page 13, Uranium: Economic uranium deposits exist in the Shitamaring Canyon district south of Mt. Hillers and on Taylor Ridges,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 43: MT. HILLERS WSA (CONTINUED)**

northeast of the WSA. Further exploration would be required to define the economic potential in this WSA. [State of Utah]

**43.8 RESPONSE:** Additional information on uranium has been added to the Final EIS.

**43.9 COMMENT:** For locatable minerals, the potential for competitive economic copper (in light of present economics) is low. The possibility of small-scale, high grade precious metal deposits (gold and silver) exist and should be considered. [State of Utah]

**43.9 RESPONSE:** Additional information on locatable minerals has been added to the Final EIS.

**43.10 COMMENT:** Industry sources believe that this WSA includes areas which contain a moderate to high potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration: historic past production of gold, copper, uranium, and vanadium. Limited roads and jeep trails on the edges of the area. Moderate potential for future production of gold, copper, uranium, vanadium, copper, silver, and tungsten in intrusive and sedimentary rocks. [Utah International, Inc.]

**43.10 RESPONSE:** Additional information on locatable minerals has been added to the Final EIS.

**43.11 COMMENT:** We question the OIR (3) for minerals. The only mineral with a rating above f2 is uranium (f3) and that seems exaggerated. The explanation of the uranium resource is "Ore bodies in this formation are expected to be scattered and small (500 to 1,000 tons), with the recoverability of this resource being unknown." The OIR (3) is probably not justified and should be downgraded accordingly. [Utah Wilderness Association]

**43.11 RESPONSE:** The overall importance rating (OIR) system has been deleted from the Final EIS. See the response to General Comment 15.7.

**43.12 COMMENT:** The wildlife description lacks snakes, lizards, amphibians, small mammals, raptors, and large nongame mammals. [Kim Jennyson]

**43.12 RESPONSE:** Refer to the response to Specific Comment 37.14.

**43.13 COMMENT:** All impacts mentioned in the No Action/No Wilderness section are relative to bison and/or deer. This game orientation, which is inadequate and biased, is especially obvious in many of the Volume IV WSAs. [Scott Mills]

**43.13 RESPONSE:** Refer to the response to Specific Comment 36.23.

**43.14 COMMENT:** Several places in the Draft EIS, including the Mt. Hiller WSA, infer that 40-percent slope was used as criteria for classifying forest lands as unsuitable. Slope is not an appropriate classification standard. Suitability is based upon biological factors and, therefore, these lands should not have been classified as not available for forest management. [Agency comment]

**43.14 RESPONSE:** See the response to General Comment 17.4.

**43.15 COMMENT:** BLM should not promote an expensive and seemingly unneeded plan to bulldoze this area's benchland pinyon pine forests for grazing. The funds required for this activity could be better spent in a less sensitive area. [Sierra Club, Cache Group]

**43.15 RESPONSE:** Current land use plans do not include any revegetative projects within the Mt. Hillers WSA. No livestock or wildlife development projects are planned within the WSA.

**43.16 COMMENT:** The State land exchange proposal is missing from Appendix 3. In the visual resources section some of the Class B scenic quality area is improperly placed in Class IV VRM classification. A supposed lack of "screening" was used to claim that 4,370 acres of the WSA lack outstanding opportunities for solitude and then the area claimed to lack outstanding opportunities for primitive recreation was made to match it. The Partial Wilderness Alternative (Proposed Action) changes a mostly manageable boundary that mainly follows intrusions to an unmanageable boundary that follows section lines. The UWA Modified All Wilderness proposal provides a manageable boundary while including the area that meets wilderness requirements. [Owen Severance]

**43.16 RESPONSE:** There are no State lands within the Mt. Hillers WSA. Also, see the response to Specific Comment 36.30.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 43: MT. HILLERS WSA (CONTINUED)**

**43.17 COMMENT:** As nearly as I can determine from public input, in excess of 99 percent of the full-time residents of Garfield County are adamantly opposed to the designation of any wilderness within our county for any reason. The below listed units cannot be supported by me as a Garfield County Commissioner for wilderness designation because the opportunity for primitive and unconfined recreation is less than outstanding due to a lack of diversity of recreational opportunity. These areas are simply geological formations which are common to the region. They are limited by either a lack of curiosity-arousing features or other unique or unusual features which would attract visitors, and their designation as wilderness would seriously limit future development of our county's mineral and geological resources. [Guy Thompson]

**43.17 RESPONSE:** The views expressed are noted. See the responses to General Comments 1.1, 2.21, and Specific Comment 30.40.

**43.18 COMMENT:** Mt. Hillers dominates 10 separate ridges and drainages which flow into beautiful red rock canyons at the base of the mountain. The entire area meets the standards for wilderness designation. Again BLM eliminates 4,370 acres because they lack vegetative and topographic screening. Having explored the benchlands of Mt. Hillers, I was astounded to read that BLM did not qualify these areas. They were superb, isolated areas which were extremely scenic. The possibilities for primitive recreation on these benchlands is excellent; backpacking, hiking, photographing, drawing, and geologic sightseeing are outstanding throughout the entire area. [Kim Jennyson]

**43.18 RESPONSE:** The land which would not be designated under the Partial Wilderness Alternative was found to be less than outstanding in both solitude and primitive and unconfined recreational values. See the response to General Comment 22.3.

**43.19 COMMENT:** Throughout this WSA one can find numerous scenic views and parts of critical integral vistas that can best be protected through wilderness designation as proposed by the Utah Wilderness Coalition. The views of the Colorado Plateau are especially outstanding and unique. We disagree with BLM's conclusions that parts of Mt. Hillers contain no solitude or primitive outdoor recreation opportunities. The entire area has numerous outstanding opportunities for primitive outdoor recreation and solitude within a natural setting that clearly outweigh any po-

tential development plans and values. [Sierra Club, Cache Group]

**43.19 RESPONSE:** Wilderness designation is not necessarily the best (or only) way to protect scenic values. The presence of scenic views and vistas is noted in the EIS. Also, the EIS indicates that 15,690 acres exhibit outstanding opportunities for solitude. The remaining 4,370 acres are located on the lower benchlands which do not meet the definition of outstanding opportunities as described in the Glossary in Volume I.

**43.20 COMMENT:** We recommend that the important bench areas of the WSA, as well as the peak, be designated. We ask BLM to perform the analysis and report on potential conflicts planned in this area. We request that BLM drop the arbitrary rating system of wilderness values for deleting areas. This conflicts with the Wilderness Study Policy. [Utah Wilderness Coalition]

**43.20 RESPONSE:** The analysis of the bench areas indicated that they lack the opportunities for outstanding, unconfined recreation and solitude. This is explained in the EIS. See the response to General Comment 8.11.

**43.21 COMMENT:** BLM failed to give any indication of how they evaluated "the outstanding wilderness" characteristics. No map shows BLM's conclusion and no method is discussed for determining these characteristics. This is further demonstrated by a description of the solitude in the area. This should be included in the EIS. No method is described on how to rate "limited" screening. Our experience in this unit finds that some of the densest pinyon-juniper forest in the Henry Mountains is found on the bench areas of this unit. It is not possible to see a person 100 feet from another. The vegetative screening is some of the best in any wilderness area. BLM offers no factual evidence that refutes this. BLM's decision to delete the benchlands is based upon proposed chainings which are not discussed in the Draft EIS. We request that BLM show all proposed projects in this area that would conflict with a wilderness designation. A cost benefit analysis needs to be performed on these range projects. This is necessary to determine if the project is a significant conflict. BLM is not allowed to have projects where costs exceed the benefits. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 43: MT. HILLERS WSA (CONTINUED)**

**43.21 RESPONSE:** See the responses to General Comments 2.12, 3.1, 3.3, and Specific Comment 43.15.

**SECTION 44**  
**LITTLE ROCKIES WSA**

**44.1 COMMENT:** While the SSA indicates that the preferred alternative is to recommend all the present WSA for designation, this recommendation is more accurately called a partial wilderness recommendation. In the intensive inventory BLM reduced the size of the unit from 66,060 acres to its present size. BLM based these deletions in the inventory on the effects of seismic lines and mineral assessments. Field investigation revealed a different story. The deletions in the southern portion of the unit coincided almost exactly with mining claims. The assessments amounted to the filing of documents, not surface activity. Seismic lines were found to be equally insignificant inside and outside the WSA. According to inventory policy, the boundary should be moved 2 miles south to the first human impact. In the north, BLM dropped Maidenwater Sands, unimpacted sand scrub brush terrain. This area is one of the important diverse plant and animal communities that should be included in the wilderness area. BLM incorrectly deleted this area when no impacts could be found in the area. The major impact in the north is a vehicle way which goes out on Trachyte Bench. This was constructed in 1979 during the wilderness review, and, according to policy, BLM should not consider post-FLPMA impacts in making the inventory decision. BLM never reclaimed this impact and removed the area from wilderness study because of it. Now it is returning to a natural condition. Most of the route is over sandy scrub terrain and there are not permanent scars that will not heal. If left unused as is now the case, this area will return and not be impairing. The reason for dropping the northern portion of the unit was to allow drilling exploration on Trachyte Point without practicing the interim management protection. Significant wilderness lands were dropped, including portions of Slickrock Canyon with the perennial Maiden Creek and Hog Springs. The massive sandstone cliffs in North Wash, with several important side canyons, were deleted. In the inventory BLM took many opportunities to delete lands meeting the mandatory wilderness characteristics in order to resolve future development conflicts. [Utah Wilderness Coalition]

**44.1 RESPONSE:** See the responses to General Comments 3.1 and 5.1.

**44.2 COMMENT:** As part of its proposal, BLM should include the following areas: (1) Hog Springs (eastern portion); (2) Trachyte Creek; and (3) Mount Ellsworth (south slopes)

BLM should be reminded that this area has been a National Natural Landmark since 1975. Some of the lands under this designation are not included in BLM's proposal but should be. [Sierra Club, Cache Group]

**44.2 RESPONSE:** These areas were all considered during the inventory process. The majority of the National Natural Landmark (NNL) is within the WSA. The criteria for WSA and NNL designation are different.

**44.3 COMMENT:** BLM should make a boundary adjustment to include more of the area with outstanding wilderness values and create a more manageable boundary. The Little Rockies are a National Natural Landmark, yet this boundary is not indicated in the Draft EIS. Both solitude and primitive recreation values are outstanding throughout the WSA according to the SSA (page 15), but now BLM claims that 11,000 acres don't meet either requirement. No information is given as to which land doesn't meet the requirements, so I assume a political decision was made so that BLM can reduce its wilderness proposal in the Final EIS. The "scenic quality is exceptional throughout the WSA" (page 10) and there are no conflicts, so BLM should adopt the UWA Modified All Wilderness proposal. [Owen Severance]

**44.3 RESPONSE:** The Little Rockies National Natural Landmark boundary has been added to Map 1 in the Final EIS. BLM's Proposed Action continues to be the All Wilderness Alternative for the 38,700-acre Little Rockies WSA.

**44.4 COMMENT:** Upon completion of the wilderness resource inventories required to be prepared as a part of the planning process, more important values will be found. In making a wilderness recommendation, the area to be designated should be expanded to include those natural BLM lands containing high scenic, cultural, scientific, and recreational values and important wildlife habitat. This large area coupled with the National Park Service wilderness proposal form a very important addition to the National Wilderness Preservation System. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 44: LITTLE ROCKIES WSA (CONTINUED)**

**44.4 RESPONSE:** These values, as they relate to this WSA, were reviewed during the inventory process. The relationship of the WSA to NPS lands is also addressed. Also, see the response to General Comment 9.6.

**44.5 COMMENT:** The Little Rockies WSA has high wilderness values and low to moderate conflicts when compared with other WSAs in the region. There is a potential uranium conflict that affects the south half of the unit. However, additional data is necessary to adequately characterize the resource. It is recommended that the WSA boundary be moved back from where it parallels Highway 267. [State of Utah]

**44.5 RESPONSE:** The comment supports the Draft EIS mineral potential determination. Public lands outside the current WSA boundary were considered and dropped during the inventory phase of the wilderness review.

**44.6 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the earlier proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**44.6 RESPONSE:** See the response to Specific Comment 36.13.

**44.7 COMMENT:** In the Vegetation portion, describe what kind of plants are present in each of the vegetation types. Give an accurate description of their location. No mention was made of bristlecone pine. [Kim Jennyson]

**44.7 RESPONSE:** It would not serve the purpose of this document to list each plant species in the vegetation types. All vegetative inventory data is maintained at the Resource Area Office and is available for inspection there. While bristlecone pine may be present in the Little Rockies WSA, there is no documentation

of it occurring there. Also, see the response to General Comment 13.8.

**44.8 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The five WSA areas, including Little Rockies, in the northeast portion of Garfield County and the southern portion of Wayne County, are situated in the Henry Mountain Basin. Although some of these areas are partially associated with Tertiary age intrusives, they all still have potential for hydrocarbon production. These Henry Mountain Basin areas are unexplored. Texaco has leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests in the resource potential of these areas. [Texaco, Inc.]

**44.8 RESPONSE:** See the response to Specific Comment 39.16.

**44.9 COMMENT:** The Geology section should be expanded to include type, location, and age ranges of surface rocks. A description of intrusive rock types and contact relationships would facilitate understanding of the Mineral and Energy Resource sections. [State of Utah]

**44.9 RESPONSE:** The Geology and Topography section has been revised and expanded.

**44.10 COMMENT:** In the Locatable Minerals narrative, an appraisal of the Salt Wash Member uranium potential would be facilitated by inclusion of target depths in this section. Also, the total acres of the WSA underlain by Salt Wash at depths of less than 1,200 ft. would be helpful. [State of Utah]

**44.10 RESPONSE:** According to the U.S. Geological Survey (USDI, GS, 1987) the Salt Wash Member is eroded from the tract. The potential for uranium deposits is moderate in the northern portion of the WSA and high in the southern portion of the WSA. These deposits would be located in the Shinarump and Monitor Butte Members of the Chinle Formation.

**44.11 COMMENT:** The locatable minerals discussion is incomplete. [Utah International, Inc., and Bureau of Mines]

a. Industry sources believe that this WSA includes areas which contain a moderate to high

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 44: LITTLE ROCKIES WSA (CONTINUED)**

potential for future important valuable or critical mineral deposits and that it should therefore be eliminated from consideration as a wilderness area. The following information is given for BLM consideration: historic past production of copper, gold, silver, and uranium, mining districts which border the WSA; limited roads and jeep trails cross the edges of the WSA; moderate potential for future production of copper, uranium, vanadium, silver, and gold from intrusive and sedimentary rocks.

b. The DEIS reports no deposits of copper are known in the study area (p. 9, Vol. IV). According to our minerals investigation of the WSA (BOM Open File Report, MLA 19-84, 1984), Texas Gulf, Inc. (formerly Texas Gulf Sulfur) discovered an orebody containing at least 400 tons of  $U_3O_8$  and 500 tons of copper in Four Mile Canyon. The deposit, although small, is present and should be included in the DEIS.

**44.11 RESPONSE:** According to the U.S. Geological Survey (USDI, GS, 1987), the WSA has a low potential for base and precious metals, but some may be found associated with uranium. The information relative to the known copper deposit explored by Texas Gulf has been incorporated into the Final EIS.

**44.12 COMMENT:** In the Wildlife section, there is no mention of lizards, snakes, small mammals, or non-game mammals. [Kim Jennyson]

**44.12 RESPONSE:** See the response to Specific Comment 37.14.

**44.13 COMMENT:** All impacts mentioned in the No Action/No Wilderness section are relative to bison and/or deer. This game orientation, which is inadequate and biased, is especially obvious in many of the Volume IV WSAs. [Scott Mills]

**44.13 RESPONSE:** Bison are not found in the Little Rockies WSA and were not mentioned in the Draft EIS. Refer to the response to Specific Comment 36.23.

**44.14 COMMENT:** BLM's assessment of opportunities for solitude and primitive recreation are wrong. [Kim Jennyson and Utah Wilderness Association]

a. Volume IV states that solitude and primitive and unconfined recreation on 11,000 acres do not meet the wilderness standards. Which 11,000 acres are these?

b. BLM's finding in the analysis that 11,000 acres lack outstanding opportunities is unsupported. Wherever these 11,000 acres are, they contribute significantly to the wilderness quality of the area. The process of "surgically" identifying outstanding opportunities is unacceptable. Review of the Draft EIS produces only one reference to the criteria used to determine opportunities for solitude: size and configuration, topographic and vegetative screening, outside sights and sounds, and the ability of a user to find a secluded spot. On their face, the criteria (especially size and configuration) require consideration of entire WSAs, but in this instance the Draft EIS determines opportunities for solitude by dissecting the WSA and determining if portions have outstanding opportunities on the basis of screening alone. It is inconsistent with the criteria listed in Volume I to over emphasize screening. This over emphasis on screening was rejected by IBLA in the 1983 remand decision.

**44.14 RESPONSE:** The tracts are irregular parcels of land which are interspersed within the WSA. Even though 11,000 acres do not contain the mandatory wilderness characteristics, they were not surgically excluded from the wilderness recommendation. The 11,000 acres in question are, in fact, included in BLM's Proposed Action, to block up the land and enhance the manageability of the proposed wilderness. Also, see the responses to General Comments 2.13, 8.11, and 22.5.

**44.15 COMMENT:** The WSA is extraordinary for the following reasons: (1) The naturalness of the area is almost unblemished. The one blemish is the National Park Service repeater on Mt. Ellsworth, an allowed structure in designated wilderness areas. (2) The proposal to designate this area as a National Landmark underscores the unique character of this area. The geology of this area compacts more unique diversity into one area than almost any other place. Although BLM hasn't finished the required archaeological resources inventory, many of the same kind of sites are expected in this area as have been found in the adjacent Glen Canyon National Recreation Area. (3) Under existing law, management of mining claims to protect wilderness values is correctly determined by BLM not to be a problem. BLM has placed this area in a "no lease" category for oil and gas. The potential for occurrence of energy/mineral resources is low. (4) Multiple use benefits from designation would ensure that small scale degradation over long periods common on public lands would not occur in this area. As with all the WSAs, BLM incorrectly underestimated the benefits

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 44: LITTLE ROCKIES WSA (CONTINUED)

of this designation. Categorically both unsuitability and suitability recommendations are found by BLM to have minor benefits or detriments. No quantitative estimation of the scale of these impacts is made. [Utah Wilderness Coalition]

**44.15 RESPONSE:** The existence of the repeater is identified in the EIS. The Little Rockies area was designated as a National Natural Landmark in 1975. An archaeological resource inventory is not required for WSA designation. There have been rock shelters and lithic scatter found, with a high potential for existence of others. The "no lease" category would have little affect on the mineral resource since the potential for the resource to be present is low. Regardless of designation, not much will change in this WSA. With the exception of small developments related to locatable minerals, there are few, if any, demands for land-disturbing land uses in this area.

**44.16 COMMENT:** Wilderness designation coincides with Natural Zone and recommended wilderness in the Glen Canyon General Management Plan (GMP) for these areas: Burning Hills, Escalante Canyon Tract 5, Horseshoe Canyon South, Fiddler Butte, Little Rockies, Grand Gulch, and Dark Canyon. [National Park Service]

**44.16 RESPONSE:** The relationship between the Little Rockies WSA and the Park Service recommendations for wilderness on the Glen Canyon NRA are noted in the Final EIS.

## SECTION G

### FREMONT GORGE WSA

**G.1 COMMENT:** BLM has whittled this WSA down to 2,150 acres from a proper 11,500 acres. It should have remained at the larger size; however, by reducing the size to less than 5,000 acres, BLM can maintain that it can only exist as a wilderness area if the adjacent Park Service area is designated wilderness. [Owen Severance]

**G.1 RESPONSE:** During wilderness inventory, the Fremont Gorge unit was reduced from 18,500 acres to 2,540 acres since 15,960 acres lacked wilderness values.

Originally the Fremont Gorge WSA was dropped from wilderness study status by the Secretary of the

Interior due to its small size. However, it was later reconsidered due to this unit being adjacent to Capitol Reef National Park, which also has lands with potential wilderness status. If the contiguous National Park Service proposed wilderness were to be designated wilderness, then the Fremont Gorge WSA could complement the designation.

In 1984, the House Subcommittee on Public Lands and National Parks conducted a hearing on H.R. 1214, a bill designed to transfer jurisdiction of certain lands, including the Fremont Gorge WSA, from BLM to the NPS. In response to the hearing, the NPS evaluated the Fremont Gorge WSA to determine its values for potential addition to the adjacent NPS unit. The NPS dropped the WSA from further consideration and concluded that, should the Fremont Gorge WSA be added to the park unit, it would only be considered a minor buffer addition to the current park boundary (USDI, NPS, 1984). Such an addition would be insignificant in terms of its value and contribution to the NPS area. As a result, BLM has not included it in the Proposed Action for designation as a wilderness area.

**G.2 COMMENT:** Originally this unit contained 18,500 acres in the inventory. By splitting the unit into two subunits and incorrectly assessing the significance of human imprints, BLM reduced this unit to its present size of 2,500 acres. The WSA boundary follows section lines in natural areas of BLM land. According to the inventory policy, WSA boundaries are to be drawn to the physical edge of significant human imprints. At this time, this area is under administrative appeal contesting BLM's inventory decision. The size of the unit plays a dominant role in BLM's rationale supporting the unsuitability recommendation. The foundation of that rationale rests on deletions made in the inventory which violate the inventory policy. Wilderness study on this area needs to include all parts meeting the mandatory wilderness criteria. [Utah Wilderness Coalition]

**G.2 RESPONSE:** See the responses to Specific Comments 39.2 and G.1. No inventory areas have been under appeal since prior to the time the Draft EIS was issued. The inventory phase has been concluded. See the response to General Comment 3.1.

**G.3 COMMENT:** The size of the remaining WSA is alleged by BLM to be unmanageable if designated wilderness. No specific future management issues are given. No evidence of any present management problems is given. Under the minimal management given

## SPECIFIC COMMENTS AND RESPONSES

### SECTION G: FREMONT GORGE WSA (CONTINUED)

this area, it still retains its wilderness character. The opinion of BLM on management of this area if designated wilderness offers no valid reason consistent with the wilderness policy supporting a unsuitability recommendation. [Utah Wilderness Coalition]

**G.3 RESPONSE:** See the response to Specific Comment G.1.

**G.4 COMMENT:** Under the wilderness study process, areas with high wilderness values and no conflicts should be recommended wilderness. BLM has no rationale which justifies its decision. This inconsistency violates the study policy. [Utah Wilderness Coalition]

**G.4 RESPONSE:** The Proposed Action does not violate the study policy. See the response to Specific Comment G.1.

**G.5 COMMENT:** Designation of a Fremont Gorge wilderness area would protect important lands adjacent to Capitol Reef. We ask BLM to include all of UWC's proposal for Fremont Gorge in a supplemental wilderness review. We also question BLM's nonwilderness recommendation for the existing WSA. No significant conflicts with wilderness designation are present in the WSA, except for the presence of a powerline. The National Park Service has plans to remove this power line in the near future, rendering this conflict irrelevant. [National Parks and Conservation Association]

**G.5 RESPONSE:** The rationale for the Proposed Action is not based on conflicts. See the response to Specific Comment G.1 and Appendix 11 in Volume I.

**G.6 COMMENT:** This small added WSA is contiguous to NPS backcountry areas in Capitol Reef National Park and is not considered to be a viable candidate for wilderness on its own because of its relatively small size, and more importantly, location in a county with strong anti-wilderness feelings. Nevertheless, its beauty, naturalness, accessibility, and uniqueness in the system, as well as contiguity to other backcountry areas of Park, Forest, and BLM lands make it a prime candidate for wilderness designation. It provides gentle walking and moderate clambering on rocks, outstanding photographic opportunities, and a placid respite from surrounding managed or private lands nearby. The Draft EIS states that, "there are no mineral leases or claims presently in the WSA." The area has low potential for development. Present grazing levels would be maintained. There are no planned

improvements in the area. All these things would logically lead to designation as the most straight forward management course for BLM to take. Fremont Gorge has been deleted for no good reason and must be included in any future BLM proposal. [Linelle Wagner]

**G.6 RESPONSE:** See the responses to Specific Comments G.1 and G.5.

**G.7 COMMENT:** The Fremont Gorge, adjacent to Capitol Reef, is a small area which is geographically part of the park. The Summary of Environmental Consequences identifies no adverse impacts other than the closing of 0.75 miles of ORV way. Much of the nearby area is open to ORV use. This area should be recommended for wilderness. [John Veranth]

**G.7 RESPONSE:** See the response to Specific Comment G.1.

**G.8 COMMENT:** Our District is planning a three phase development using the water of the Fremont River. The project is in the \$40 to \$50 million range and will provide approximately 500 full-time equivalent jobs Statewide. Some of the WSA's are particularly objectionable to us in view of possible conflicts with our project. These are not adequately addressed in the Draft EIS. The Fremont Gorge WSA will be affected by upslope water system improvements that will improve water use efficiency and reduce salt contribution to the Colorado River. These improvements are a part of our planned project. [Wayne County Water Conservancy District]

**G.8 RESPONSE:** Information on the potential for water project development has been added for the Final EIS. The WSA includes portions of the Calf Canyon and Sulphur Creek drainages. It does not include any of the Fremont River.

**G.9 COMMENT:** Concerning locatable minerals, we note that favorability and certainty ratings do not indicate a mining claim's validity. This statement does not belong in this document. The validity of a mining claim can only be determined by a validity examination. [Agency comment]

**G.9 RESPONSE:** Favorability and certainty ratings for mineral resource potentials have no bearing on the validity of mining claims. The text of the EIS has been changed to reflect the comment.



## SPECIFIC COMMENTS AND RESPONSES

### SECTION G: FREMONT GORGE WSA (CONTINUED)

**G.10 COMMENT:** There is a bias away from any sort of priority for wildlife. For example, Fremont Gorge WSA is described as being critical deer winter range throughout. Also, two endangered species are "likely to inhabit the WSA." All of these species would be negatively impacted by disturbances under the No Action/No Wilderness Alternative, yet BLM's recommendation is for No Wilderness. It would seem that for many of the WSAs priority should be given to the alternative which most benefits broad wildlife values regardless of conflicting multiple use possibilities. [Scott Mills]

**G.10 RESPONSE:** The major criteria for wilderness are naturalness and outstanding solitude or outstanding primitive recreation. Other aspects such as wildlife are considered as supplemental or special features. The presence of wildlife, by itself, is not justification for designation of wilderness. In fact, certain species do best in manipulated habitats rather than in wilderness conditions. The wildlife values are considered for each WSA on a case-by-case basis, and in some cases wildlife values do support the wilderness Proposed Action.

**G.11 COMMENT:** All of the WSAs in Volume IV did not include any maps other than the basic WSA maps, so there was no way to check the validity of the Draft EIS. These were the least informative in the State. Maps should have been included showing intrusions, outstanding opportunities for solitude and primitive recreation, mineral leases, mining claims, etc. What about the other areas in the Henry Mountains Resource Area that were thrown out earlier in the wilderness process or are still not recommended for wilderness? Why won't BLM admit in the Draft EIS that some of the earlier proposals were completely wrong? All of the decisions on the inventory units in the Henry Mountains Resource Area are now suspect and should be reevaluated by "unbiased" BLM personnel. [Owen Severance]

**G.11 RESPONSE:** See the response to Specific Comment 36.13.

**G.12 COMMENT:** BLM made a poor decision in not recommending any wilderness for Fremont Gorge. We support the 18,000-acre Utah Wilderness Coalition proposal for this area which is a natural extension of Capitol Reef National Park. Please consider these additional comments on Fremont Gorge: The entire WSA contains outstanding opportunities for solitude in a very natural setting. These wilderness qualities per-

mit high quality outdoor primitive recreational opportunities throughout the year. We disagree with BLM's conclusion that no such opportunities are present. Wilderness designation will protect unique riparian habitats along the Fremont River. [Sierra Club, Cache Group]

**G.12 RESPONSE:** See the responses to General Comment 3.1 and Specific Comment G.1.

**G.13 COMMENT:** BLM recognizes that this area is an extension of parts of Capitol Reef National Park that are recommended for designation as wilderness. The Draft EIS offers no evidence that BLM addressed the concerns of the national park. The wilderness proposal shown on the map fails to include other portions of the park which are proposed for designation. Additional portions of these park wilderness proposals about the part of the Fremont Gorge unit which were under appeal. [Utah Wilderness Coalition]

**G.13 RESPONSE:** BLM has coordinated with the NPS during preparation of the 1984 study referenced in response to comment G.1 and during the scoping process for this wilderness EIS. The NPS responded that the area was insignificant in terms of value to the national park and this was noted in Volume IV of the Draft EIS. Additional coordination with the NPS was carried out during preparation of Pocket Map 2 which shows all proposed wilderness within the NPS units. BLM lands in the vicinity of Fremont Gorge and outside of the WSA are not the subject of this wilderness EIS and are not under appeal. See the responses to General Comment 3.1 and Specific Comment G.2.

**G.14 COMMENT:** I emphatically do not agree with the Draft EIS conclusion concerning opportunities for primitive, unconfined recreation. Traversing the narrows of the canyon or attempting (usually unsuccessfully) to climb out of the precipitous side canyons, provides some of the most primitive hiking I have encountered in any WSA. There are ample opportunities for other primitive recreation, particularly rock-climbing, horseback riding and nature study. I talked to a citizen of Torrey who, with several others, had made a kayak trip through the canyon during high water and had found it to be an experience of the highest quality. The trip through the canyon and its narrows within Capitol Reef is a long 1-day hike (15-20 miles); it would be an enjoyable overnight trip, allowing exploration of the many side canyons. [Jack Spence]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION G: FREMONT GORGE WSA (CONTINUED)**

**G.14 RESPONSE:** The comment apparently addresses a location not within the WSA. The name Fremont Gorge for this WSA is misleading. Actually the WSA is located at Calf Canyon and Sulphur Creek. Neither Calf Canyon nor Sulphur Creek have floatable water. The Fremont River Gorge itself is never closer than 1 mile from this WSA.

**G.15 COMMENT:** BLM should consider the transfer of the Fremont Gorge WSA to the NPS. [State of Utah and Utah Wilderness Association]

a. Fremont Gorge WSA is ranked last both for wilderness values and conflicts within the region. Due to the WSA's small size and adjacency to Capitol Reef National Park, additional study needs to be given to possible transfer of this WSA from the BLM to the NPS.

b. The best resolution of the wilderness issue for Fremont Gorge WSA would be to add the WSA to Capitol Reef National Park. The local governments support this action as does UWA.

**G.15 RESPONSE:** As noted in the EIS, this concept was included in proposed legislation (H.R. 1214, 1984) and the WSA was studied for possible transfer. The NPS concluded that the WSA would not add substantially to the purposes or values of Capitol Reef National Park. Wilderness designation and interagency land transfer are two completely independent subjects. Lands may be designated wilderness with or without land transfer to the NPS, just as lands may be transferred with or without wilderness designation. Both actions (ie. expand the national park boundaries or add to NWPS) would necessitate Congressional action. Also see the responses to General Comment 3.24 and Specific Comment G.1.

**G.16 COMMENT:** We request BLM include a map showing the intrusions in the area and their location. [Utah Wilderness Coalition]

**G.16 RESPONSE:** The text of the Draft EIS states that the only intrusion is a way approximately 0.75 mile in length. There would be little value gained in adding a map of this way to the EIS since it already is noted and since it had no influence on the alternatives.

**G.17 COMMENT:** The recognized high qualities of this area's solitude and naturalness make designation as wilderness a significant component of an integrated wilderness area along the Capitol Reef. We request

that BLM include in the Draft EIS a map showing the relationship of this area and the NPS wilderness proposal. [Utah Wilderness Coalition]

**G.17 RESPONSE:** The NPS wilderness proposal is adjacent to this WSA along the Park boundary as shown on Pocket Map 1 in Volume I of both the Draft and Final EIS. Also, see the responses to General Comments 23.14 and 23.15.

**SECTION 45**  
**MANCOS MESA WSA**

**45.1 COMMENT:** BLM failed to consider a boundary that excluded significant impacts but included the natural lands of the area. The upper part of Steer Pasture Canyon and the Clay Hills are completely natural with no impacts. From Irish Spring, a cherry-stemmed route up Steer Pasture Canyon 4.6 miles would exclude all the impacts in that area. The House Cliffs have no impacts and are completely natural. BLM failed to include these in the intensive inventory. In Red Canyon, BLM should have included the western cliff in the WSA. In the middle of Red Canyon, there are some old mining impacts which occupy less than 1,000 acres and these could be excluded and still retain almost all the unimpacted cliff in the WSA. BLM erred in deleting natural areas from study. [Utah Wilderness Coalition]

**45.1 RESPONSE:** See the response to Specific Comment 3.1.

**45.2 COMMENT:** It needs to be restated that the "all wilderness" proposal really is a partial wilderness proposal. If you have visited Moki Canyon, you wonder why the north canyon wall is wilderness, but the south not. You wonder why you must hike a full day from the last major impact on the south until you reach the WSA boundary. You wonder why the WSA boundary was placed a 0.5 mile up the cliff in Red Canyon leaving out so much that still is natural. The inventory boundary was and is grossly wrong. The boundary was drawn in order to exclude large natural areas. The excluded acreage contains mining claims, including some held by a local county commissioner. BLM policy does not permit such an exclusion, but it did occur. Now BLM has an opportunity to correct that error. Lower Moki Canyon below the sand slide has no impacts and a perennial stream. All evidence of impacts ends a 0.25 mile down from the sand slide.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 45: MANCOS MESA WSA (CONTINUED)

BLM incorrectly moved the boundary to the canyon rim excluding this excellent hiking and critical habitat area from study. This violated the inventory policy. [Utah Wilderness Coalition]

**45.2 RESPONSE:** See the response to Specific Comment 3.1.

**45.3 COMMENT:** The boundaries are not perfect, and the alternatives need fine tuning, but the core wilderness values are properly assessed, and the development conflicts are put in accurate perspective. [Utah Wilderness Coalition]

**45.3 RESPONSE:** The analysis in the Final EIS focuses on the significant issues.

**45.4 COMMENT:** The "partial" recommendation makes deletions that baffle reason. The boundary goes up the side of one portion of upper Cedar Canyon. The highest part of the mesa is excluded for the wrong reasons. Post-FLPMA impacts are used to justify dropping this tract. BLM is required to reclaim illegal impacts. Reduction of the WSA should not be based upon the failure of BLM to follow the Interim Management Policy. [Utah Wilderness Coalition]

**45.4 RESPONSE:** BLM's Proposed Action in the Final EIS is the All Wilderness Alternative.

**45.5 COMMENT:** Once it has been estimated approximately how much mineral may be present, what development will occur, and what and how much the development will consist of, an analysis of the impacts can be done. Producing 10 million barrels of oil may involve a field of approximately 2,500 acres and require a reasonable estimate of the impacts on wilderness values, wildlife habitat, etc., from these activities. As currently presented, the impacts on those values identified in most site-specific WSAs do not appear to be logical or accurate. If 160 acres of disturbance is dispersed over a 2,500-acre field, it is not logical to assume that only 160 acres of wilderness values will be impaired. The impacts from 160 acres of disturbance will impair most of the wilderness values within the 2,500-acre field and probably extend well beyond into lands surrounding the field as sight, sound, and disturbance interact with resources. In Mancos Mesa, it was determined that 20 pads disturbing 5 acres and 25 miles of road from previous development had impacted over 5,000 acres of wilderness values. Field development in the rest of the WSA will result in disturbance of 200

acres; however, the impact on wilderness values is estimated to be only confined to the 200 acres of disturbance. This is not realistic. [Agency comment]

**45.5 RESPONSE:** The assumptions for the analysis in the Final EIS have been revised to account for feasibility of development. See the responses to General Comments 9.10 and 15.20. With the No Action/No Wilderness Alternative, it is projected that 84 acres would be disturbed due to uranium and oil and gas exploration and 10 acres would be disturbed by access to State in-holdings. However, it is projected that no development (commercial extraction) would occur following exploration because of economics and difficulty in locating the oil and gas resource. Secondary impacts are also addressed.

**45.6 COMMENT:** I think ecological continuity is a distressingly minor component of the Draft EIS, and I would like to see a lot more value given to this in the Final EIS. The Mancos Mesa WSA I find very puzzling and very disturbing. The boundaries of it seem to be rather arbitrarily drawn, and the dropping by BLM of the southeast section of that WSA for proposed wilderness, due to a lack of apparent outstanding solitude value, is just plain wrong. [Warren Gold]

**45.6 RESPONSE:** The boundaries were determined based on the criteria used in the inventory phase, which has been completed. Ecological continuity is not one of the criteria.

**45.7 COMMENT:** This WSA is an example of BLM using post-FLPMA impacts on pre-FLPMA leases to eliminate 5,320 acres from wilderness consideration. The statement, "these imprints . . . were rehabilitated as much as possible and closed" is not correct. The photographs of the WSA in the San Juan Resource Area Office show that the roads were not rehabilitated. Much of the exploration impact could still be obliterated, but BLM refuses to do it. It is a good excuse to eliminate 5,320 acres from the wilderness proposal. If these impacts were cleaned up, all of the WSA would meet the naturalness requirement and the outstanding solitude and primitive recreation requirements. All of the WSA should be proposed for wilderness designation, but it obviously won't be. Calvin Black won't allow it. [Owen Severance]

**45.7 RESPONSE:** Post-FLPMA impacts on pre-FLPMA leases have no influence on the determination of BLM's Proposed Action for wilderness designation. In the Final EIS, BLM's Proposed Action is the All

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 45: MANCOS MESA WSA (CONTINUED)**

Wilderness Alternative. Additional efforts to rehabilitate portions of the intrusions were initiated in 1989.

**45.8 COMMENT:** We made a road into about three sections and there was already one made to a school section up there. We made a road into T. 36 S., R. 14 E., sec. 32. We constructed some stock ponds on that section and we went from Section 32 over to Section 2 and 37 South, Range 13 East. We constructed some ponds there and built a road or trail into a spring down there and put in a water trough for watering livestock and wildlife. Then we constructed a road into Section 32 and these are additions to. I'm not saying these are really good roads, you can drive on them with a 4-wheel drive. These are in addition to roads already made by the Gulf Oil Company when they made the roads on this Mancos Mesa area. Mancos Mesa is not a roadless area. [T-Y Cattle Co.]

**45.8 RESPONSE:** The travel routes mentioned were created after the passage of FLPMA but prior to the wilderness inventory and IMP guidelines. Such actions are reclaimable (by natural means or otherwise) and are not factors in determining BLM's Proposed Action. Access to State sections is required by law, regardless of the wilderness or nonwilderness potential of the adjacent Federal lands.

**45.9 COMMENT:** For the Partial Wilderness Alternative, acquisition of seven State sections (4,482 acres) would be likely. See Map 1. [State of Utah]

**45.9 RESPONSE:** The State has changed its position on exchange of State sections (see Chapter 1 in Volume I), consequently, it now is assumed that acquisition of State lands would not occur. See the responses to General Comments 6.3 and 23.10.

**45.10 COMMENT:** Mancos Mesa WSA has moderate wilderness-quality values but a high significance of conflicts compared with the other WSAs in this region. The high conflicts are primarily with potential uranium and hydrocarbon resources. There is also a potential conflict with groundwater development. [State of Utah]

**45.10 RESPONSE:** BLM has determined that future exploration for uranium and hydrocarbon resources would be likely but that commercial development of these resources would be unlikely (refer to Appendix 6 in Volume I). No significant conflict with groundwater development is expected.

**45.11 COMMENT:** Wilderness designation would protect important perennial streams which serve wildlife in the area. [Sierra Club, Cache Group]

**45.11 RESPONSE:** There are no perennial streams in the Mancos Mesa WSA.

**45.12 COMMENT:** There have been no seismic lines, well pads, or roads built by any oil and gas company on Mancos Mesa. Oil and gas exploration has had no effect on wilderness values. [Brian Wood]

**45.12 RESPONSE:** Past exploration activities are related to uranium. The EIS states that no oil and gas wells have been drilled on the mesa (i.e., within the WSA).

**45.13 COMMENT:** Drilling of this area in the late 1970s disclosed some uranium mineralization. [State of Utah]

**45.13 RESPONSE:** BLM does not have access to the downhole data that was obtained from the drilling. The EIS indicates the WSA has a moderate potential for occurrence of uranium. Additional uranium exploration is projected in the WSA in the foreseeable future.

**45.14 COMMENT:** BLM illegally allowed post-FLPMA disturbance in the WSA. [Drew Leemon and Scott Delong]

a. The 19 miles of illegally constructed roads resulting from oil and gas exploration which occurred during the mid-1970s should be rehabilitated at the expense of Gulf Oil, and should not have been allowed to remain and detract from the wilderness potential of the Mancos Mesa WSA.

b. The actions of BLM in this area have been shameful if not outright illegal. After this area was set aside as a WSA your agency allowed a uranium exploration company to build 30 miles of new roads right into the middle of Mancos Mesa. This was done in clear disregard of the law (I do not care what Jim Watt had to say about it) and a complete contravention of your agency's duties with regards to the wilderness study process. You allowed the illegal road-building and now you are recommending that those areas involved be dropped from further consideration. I would like to see whoever made that decision compelled to do hard labor to reclaim this area to its natural state! This kind of behavior on the part of

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 45: MANCOS MESA WSA (CONTINUED)**

a supposedly responsible Federal agency is appalling and despicable!

**45.14 RESPONSE:** The exploration routes were not constructed illegally. See the responses to Specific Comments 45.7 and 45.8.

**45.15 COMMENT:** It is my understanding that the roads built by Gulf Minerals are to be reclaimed and, in fact, the roads are now only used by very occasional ORV use. If successfully reclaimed, the area should again be suitable for wilderness. Given the low probability of mineral development (nicely illustrated by Gulf's failure to find any uranium in commercial quantities), there appears to be a lack of conflicts with other possible uses at Mancos Mesa. [Henry Wright]

**45.15 RESPONSE:** Additional reclamation work was initiated in 1989. Natural erosion and revegetation will contribute to reclamation of the exploration access routes. See the responses to Specific Comments 45.4, 45.7, and 45.8.

**45.16 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS's pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**45.16 RESPONSE:** See the response to Specific Comment 39.16.

**45.17 COMMENT:** The Draft EIS now states that "no oil and gas production is expected" and "likelihood of development (of uranium) is thought to be minimal." The exploration companies have come and gone and no mineral conflicts remain. The area is also an extremely poor grazing area so that is not a viable conflict either. It is, however, an extraordinarily wild and rugged wilderness. This area includes deep, labyrinthine canyons, areas of sand dunes, steep-ledged slopes, and many benchlands. It is about as remote as any land in the State of Utah. Recreational opportunities are many and of excellent quality. This

area is prime wilderness and should be protected in its entirety. What conceivable reason is your excuse for nondesignation of Moki Canyon now that your corporate cohorts have left the area? Moki Canyon and its tributary canyons are lovely, remote, and pristine. Moki Canyon itself contains a virtually untouched perennial stream which adds considerably to its attraction for hikers and photographers. There is absolutely no excuse for not designating this entire area as wilderness. I hope that you will attempt to redeem yourselves by including a recommendation for 108,700 acre Mancos Mesa/Moki Canyon wilderness area in the Final EIS. [Scott DeLong]

**45.17 RESPONSE:** BLM's Proposed Action in the Final EIS is for wilderness designation of 51,440 acres. The rationale for the Proposed Action is summarized in Appendix 11 of Volume I. Moki Canyon contains a county road and does not meet the criteria for wilderness. It is not part of the WSA.

**45.18 COMMENT:** While I agree with the BLM proposal that most of this WSA be wilderness, I think that the scenery is underrated. The vast expanses of colorful slickrock should be rated Class A. There are many opportunities for photography and sightseeing which should not be underrated. [Michael Van Note]

**45.18 RESPONSE:** The scenic attributes of the Mancos Mesa WSA are described in the EIS. The extent to which they may or may not be underrated is a matter of individual judgment. The scenery of the WSA was evaluated on the basis of the BLM VRM rating system as described in Appendix 7 in Volume I.

**45.19 COMMENT:** A downplaying of the positive effects of wilderness recreation appears in at least one area analysis, and probably in others. Although the Draft EIS does not estimate increased recreation use for most WSAs, it does for Grand Gulch: 58 percent over the 1984 level, compared to a projected 48 percent increase without designation (Volume 5, p. 35 and 32). But this increase is dismissed as insignificant on page 38, owing to the existing popularity of the area. If Grand Gulch is unlikely to increase significantly, what about other relatively unknown WSAs? Wilderness designation for all WSAs would increase wilderness-related visitation, without focusing use [and hence impacts] on a few areas as is now the case. The Draft EIS should consider this potential increase in its employment and income analysis, for it may well be significant. The "designation effect" is recognized as a potential source of increased

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 45: MANCOS MESA WSA (CONTINUED)

employment opportunities for the four to five commercial outfitters that use the WSAs. However, the Draft EIS claims that this increase would be insignificant to the State and even to local communities. Analysis of one individual WSA (Mancos Mesa) suggests otherwise. The Draft EIS states that recreation use of Mancos Mesa would increase from 402 to 5,144 RVDs/year, assuming a 2 percent annual growth increase. The Draft EIS states that "commercial outfitting oriented to primitive outdoor activities would benefit." This is the epitome of understatement. According to the Draft EIS, the increase in outfitting jobs in this area alone would be equivalent to 1/4 of the loss in potential jobs Statewide in grazing (that is, two jobs). If employment gains from designating all WSAs were added together and appropriate recreation-based employment ratios were used, it seems clear that wilderness designation would more than compensate for the loss of potential future jobs in grazing. This simply reflects the fact that WSAs provide rather little in the way of grazing-related employment. The Draft EIS also suggests that nondesignation would allow a (relatively minor) 5 percent increase in mining-related employment. However, the Draft EIS seriously overestimates the potential for future WSA mining activities. An objective economic analysis would show a net positive gain for local and regional economies with wilderness designation. The Draft EIS should carefully assess this question in the comparison of alternatives. [Utah Wilderness Coalition]

**45.19 RESPONSE:** The potential for recreation-based employment and mining-based employment has been reviewed for the Final EIS. See the Descriptions of the Alternative and the revised Socioeconomic sections. Recreation use data indicate that recreational use increases in the future will be related more to overall population increases than to wilderness designation. Designation has not been shown to lead to increases in recreational use.

**45.20 COMMENT:** If you have ever spent some time on Mancos Mesa, you are limited in the solitude because you hear the diesel generators and motors running. I think they are over in Ticaboo. But you can hear them running over in the WSA. The Draft EIS underestimated the amount of uranium that's a possibility on Mancos Mesa. Because both the Happy Jack Mine and Markey Mine channels run through this Manco Mesa area, there's no reason not to expect that there wouldn't be ore in areas on Mancos Mesa. [T-Y Cattle Co.]

**45.20 RESPONSE:** Diesel generators and motors have not been heard by BLM field employees during the times that they have been in the Mancos Mesa WSA. Also, see the response to Specific Comment 45.13.

**45.21 COMMENT:** The canyon areas include excellent opportunities for primitive recreation with wilderness-quality solitude and high levels of naturalness throughout. BLM should remember that in 1975, Gulf Minerals Corporation was allowed to build a 30-mile road and then install 22 drill pads into this virgin 100,000-plus-acre area. This was clearly a violation of the required management procedures for this land and it serves as a good example of why wilderness designation is needed. Fortunately, the impacts from Gulf Oil are not very significant today and do not detract from the area's naturalness or solitude. This violation, on the part of BLM, should not be allowed to prevent this pristine area from entering the National Wilderness Preservation System. [Sierra Club, Cache Group]

**45.21 RESPONSE:** The WSA is 51,440 acres. Lands outside of the WSA were reviewed during the inventory phase and did not meet the criteria for further wilderness consideration. Regarding the exploration routes, see the responses to Specific Comments 45.1, 45.7, 45.8, 45.14, and 45.15.

**45.22 COMMENT:** BLM has no method or explanation which describes how they arrived at the rating system for the most outstanding wilderness characteristic. In one area with equal topography and vegetation cover, the solitude "does not meet the standard" says the Draft EIS. No supporting information of methodology is given. It can be easily said that some of the areas that BLM says has met the standard are identical to those that don't. BLM's conclusion is arbitrary and unsupported by the physical evidence. BLM should eliminate this rating from the Draft EIS. [Utah Wilderness Coalition]

**45.22 RESPONSE:** See the responses to General Comments 9.8 and 22.3.

**45.23 COMMENT:** The boundary shown on the Draft EIS for the WSA is different from that which evolved from the administrative appeal. We request that BLM print the decision on that boundary and show why this boundary differs. In the sand slide area, the boundary is as much as a 0.5-mile further north. No reasons are given for this. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 45: MANCOS MESA WSA (CONTINUED)**

**45.23 RESPONSE:** The boundary in question is the same as the unit boundary published in the Final Decision on Wilderness Study Areas (USDI, BLM, 1980). That document indicated that no WSA be identified; the appeal resulted in all of the unit becoming a WSA. The boundary did not change.

**SECTION 46**  
**GRAND GULCH ISA COMPLEX**

**46.1 COMMENT:** The Wilderness Act specifies that wilderness is needed to assure that an increasing U.S. population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the U.S., leaving insufficient lands designated for preservation and protection in their natural condition. In many instances these important sociocultural objectives cannot be met by an indiscriminate application of the principle of "multiple use." [Utah Wilderness Coalition]

**46.1 RESPONSE:** See the response to General Comment 1.2.

**46.2 COMMENT:** The WSA boundaries are improperly placed. [Damian Fagan, Owen Severance, and John Veranth]

a. During the initial wilderness inventory, instead of moving the boundaries of the Grand Gulch Primitive Area out to impacts and intrusions, separate inventory units were created all around the primitive area. This action violated the rules of the wilderness study process. "The resulting 'inventory units' will be roadless areas or islands, bounded by either a road, non-public lands, or water, in islands or coastal situations." (Wilderness Inventory Handbook, p. 10). Clearly, at the inventory state, the Grand Gulch Complex should have been considered as one "inventory unit" instead of eight. Two of these inventory units were then thrown out during the initial wilderness inventory as the result of insufficient information. The elimination of UT-060-187 resulted in an unmanageable boundary that follows section lines along the west side of lower Grand Gulch. The statement on page 3 of the Draft EIS, "the . . . west boundary of the ISA Complex (which is the same as the west boundary of the existing Grand Gulch Primitive Area) is well known and well marked . . .," is not correct. The only sign marking the 9 miles of boundary is at the Collins Springs parking lot. There is no way to

find the rest of the boundary except by locating section markers. This boundary would (and should) have been moved out to a road or intrusions if the mandate in the Wilderness Inventory Handbook had been followed. Inventory unit UT-060-195 was also improperly thrown out during the initial inventory. This area includes upper Grand Gulch and the middle of Kane Gulch. The "Wilderness Inventory Situation Evaluation," the only documentation for the decision eliminating this inventory unit, states "the area obviously and clearly does not have potential for wilderness because it has suffered a significant loss of natural qualities . . ." That conclusion is a lie. All of the significant intrusions and impacts are on the perimeter of the unit and comprise less than 10 percent of the unit. They can all be eliminated by moving the boundary of the inventory unit to the edge of the intrusions. This boundary adjustment leaves approximately 8,000 acres of pristine wilderness, including about 5 miles of Grand Gulch. The only intrusions left are a minor way extending to the rim of Grand Gulch on the west side, a minor way in Long Flat that is stopped by a system of 15-foot-deep gulleys, and a drill pad and access road that are rapidly returning to a natural condition. In addition, BLM's proposal results in an unmanageable northeast boundary for the ISA. The ISA boundary is an imaginary line that crosses the canyon near the middle of the photograph. There is no difference in wilderness qualities on either side of the boundary. The area is entirely natural and meets the requirements for wilderness designation. Sixty-two archaeological sites have already been recorded in UT-060-195 even though no systematic survey has been made. BLM should change its proposal to my Modified All Wilderness Proposal to improve manageability in the north-east part of the ISA and include more of the Grand Gulch drainage. All of the additional area meets all of the requirements for wilderness designation. This area should never have been eliminated.

b. The western boundary is currently section lines. The boundary should have been moved west to include Steer Gulch. The statement that this area is scarred with roads and trails is incorrect. There is a single, easily identifiable road which is now closed to vehicles as the existing road alignment cuts through the Grand Gulch Primitive Area.

c. What has happened to the upper drainages of Grand Gulch and Kane Gulch, as well as some of the benchland of Long and Todie Flat? Certainly there are some man-made intrusions into these areas, but most

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

of this acreage (approximately 8,000 acres) also deserves wilderness status.

**46.2 RESPONSE:** See the response to General Comment 3.1.

**46.3 COMMENT:** BLM is recommending that all 105,520 acres of the Grand Gulch Complex be designated wilderness by an act of Congress as part of the NWPS. In addition, BLM needs to consider expanding the boundaries on the west side and at the north end. These additions are justified in part from an ecosystem point of view, will provide possible needed protection to the deeper canyons, and contain numerous sites of archaeological value apparently not known to BLM. While these areas contain evidence of human intrusions, they have not lost their natural character as a whole. Most human intrusions can be mitigated or will gradually disappear over time. In any event, BLM can change the boundaries of these units to exclude problematic intrusions such as the old temporary Grand Gulch Ranger Station and then reassess the units. While neither of these areas possess the spectacular, outstanding character of the core of the Grand Gulch Complex wilderness, they meet and exceed minimal standards for wilderness designation as natural areas and cannot legally be excluded from intensive inventory by BLM. [Utah Wilderness Coalition]

**46.3 RESPONSE:** Areas with intrusions do not meet the criteria for wilderness designation. BLM is aware of the archaeological values, but these by themselves do not qualify the area for wilderness designation.

**46.4 COMMENT:** More of the lower reaches of John's Canyon should be included, using the main road as the boundary. The amount of intrusion in the canyon itself is quite minimal, consisting only of several fences and other small remains of ranching activity, which could easily be removed (or kept as reminders of the ranching heritage of the area). Both of the ways on either side of the creek consist only of two-wheel ruts which could easily be reseeded. Accordingly, I would support the inclusion of Sections 36 and 35, Township 40 South, Range 17 East, as wilderness. [Henry Wright]

**46.4 RESPONSE:** Both sections are outside of the WSA. Section 36 is State land and is not subject to Federal wilderness designation. Also, see the responses to General Comments 3.1 and 6.4.

**46.5 COMMENT:** In the Grand Gulch Complex, in the Pine Canyon area, there are roads into the area. And the one road goes part near through. And then there's a road in the northwest part of the Pine Canyon complex. [T-Y Cattle Co.]

**46.5 RESPONSE:** There are vehicle travel routes in the Pine Canyon area; however, during the inventory they were not found to meet the criteria to qualify as defined roads. See the response to General Comment 4.1.

**46.6 COMMENT:** Blocking motorized access into John's Canyon: A county road provides access to the lower part of John's Canyon where it is possible for motorized use to continue for about 1 mile up canyon within the Grand Gulch Complex. While such motorized use is rare, efforts should be taken to prevent any further motorized use in John's Canyon. Violators should be subject to heavy fines and/or imprisonment. [Utah Wilderness Coalition]

**46.6 RESPONSE:** Vehicle access to the lower part of John's Canyon is allowed and would continue with the cherry-stem shown on the WSA maps. The road is not within the WSA.

**46.7 COMMENT:** Access to this area, even foot traffic through Grand Gulch, is having a significant impact. We suggest that BLM consider controlling access to this area to minimize these impacts. [Wasatch Mountain Club]

**46.7 RESPONSE:** BLM monitors visitor use in Grand Gulch and will take management measures to regulate the amount and location of heavy use, as needed. This will be done, regardless of wilderness designation or nondesignation, as the popularity of the area increases.

**46.8 COMMENT:** There are inconsistencies regarding State lands. [State of Utah and Utah Wilderness Coalition]

a. The six adjacent State sections (3,680 acres) should be acquired through a process of land transfer. Management of former State in-holdings should be the same as on adjacent Federal lands.

b. Acquisition of four State sections (2,400 acres) would be likely. See page 1, paragraph 1.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

**46.8 RESPONSE:** Information on in-held and adjacent State lands has been reviewed and revised. See the responses to General Comments 6.3 and 23.10.

**46.9 COMMENT:** The maps in the text should indicate which State land is proposed for exchange. I had to transfer the information from Appendix 3 to each map - a long (but informative) process. There are several inconsistencies in this list. For example, in the Grand Gulch ISA Complex, T. 38 S., R. 18 E., sec. 32, is proposed for exchange, but T. 40 S., R. 18 E, sec. 16 is not. Why? Also, most of the split-estate land in the WSAs is to be exchanged; however, none of the split-estate land in the Dark Canyon ISA Complex is proposed for exchange. Again, why? [Owen Severance]

**46.9 RESPONSE:** State lands are no longer proposed for exchange. See the revised information on State lands in Chapter 1 and Appendix 3 in Volume I. There is no split-estate in the Grand Gulch ISA Complex.

**46.10 COMMENT:** The socioeconomic tourism value of areas in Utah set aside as wilderness will likely increase over time in proportion to the negative impacts of U.S. population growth on land elsewhere. The fact that Utah has many areas already under some form of Federal protection should not inhibit the process of wilderness designation. Wilderness areas are intended by Congress to be a national resource, designed for the use and enjoyment of Americans throughout the U.S. BLM has placed too much analytical emphasis on the anti-wilderness positions of small, special interest groups associated with marginal mining and livestock industries that are not representative of the views of typical Utah or U.S. taxpayers. [Utah Wilderness Coalition]

**46.10 RESPONSE:** The EIS is intended to place analytical emphasis on the significant impacts of each of the alternatives. It has not been tailored to any particular interest group. It does contain information on certain required subjects. For example, Congress has directed that mineral resources be specifically addressed as part of the wilderness study process. See the responses to General Comments 2.18, 2.20, and 8.14.

**46.11 COMMENT:** The ISA Complex is currently a PSD Class II area under the provisions of the Clean Air Act. This should be upgraded to Class I air quality. The Department of Interior recommended to Con-

gress in 1979 that the Grand Gulch Primitive Area had air quality related values as important attributes of the area worthy of redesignation to Class I air quality. Implementation on this recommendation should take place as soon as possible. [Utah Wilderness Coalition]

**46.11 RESPONSE:** The EIS explains that redesignation to air quality Class I is the prerogative of the State of Utah. See the responses to General Comments 10.1 and 10.5.

**46.12 COMMENT:** Four sensitive species (Astragalus cottamii, Astragalus monumentalis, Erigeron kachinensis, and Zyadadenus vaginatus) are under review by the Fish and Wildlife Service for possible threatened or endangered status. The presence of these species within the Grand Gulch Complex occurs and needs to be fully documented. [Dennis Willigan]

**46.12 RESPONSE:** See the Vegetation section in the Affected Environment portion of the WSA analysis and Fish and Wildlife Service correspondence in Appendix 4 in Volume I of the Final EIS for updated information regarding these species. Also, see the responses to General Comments 13.1 and 13.8.

**46.13 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EISs pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**46.13 RESPONSE:** See the response to Specific Comment 39.16.

**46.14 COMMENT:** Pressures to exclude areas from wilderness are undoubtedly coming from energy companies which wish to obtain low-cost leases now for possible later development, thus robbing the American people of the true value of any resources that might later be needed. [Jack Spence]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

**46.14 RESPONSE:** The possibility of low-cost leases is not a factor related to wilderness. The interest in leasing at any location on public land is much lower now (late 1989) than it was when the oil and gas market conditions were higher.

**46.15 COMMENT:** Because "mineral production is not currently occurring and the area has no known potential for locatable minerals," no loss in local employment in the mining industry is likely to occur as a result of wilderness designation. Government and tourism are San Juan County's most important sources of employment and income after the mining sector which is the largest local private employer. Wilderness designation will thus not result in negative impacts on the mining industry but will likely have very positive economic and employment impacts on virtually all other sectors in this depressed region. [Utah Wilderness Coalition]

**46.15 RESPONSE:** For the Grand Gulch Complex, wilderness designation is not expected to have major negative or positive economic results. Grand Gulch would be managed for recreation and scientific values under the No Action/No Wilderness Alternative much the same as with wilderness designation. Grand Gulch already is well known as a primitive area and receives substantial visitor use. This is explained in the EIS.

**46.16 COMMENT:** Page 8 has a clause to control predators that threaten protected species of wildlife. We all know that these predators are far more rare than the different species of wildlife that they prey upon. To wit, it certainly adds to the wilderness experience to see or hear sign of these predatory animals; instead of knowing they have been removed to protect "threatened or endangered wildlife." No animals were listed in the Wildlife section as having any of this protective status, so why the inclusion? [Damian Fagan]

**46.16 RESPONSE:** The Description of the Alternative includes information on how designated wilderness areas would be managed, including predators. Similar information is provided in the Introduction to Volume V. It is applicable to Grand Gulch because the Wildlife section does identify coyote, bobcat, and mountain lion (cougar) which are considered to be predators. The Final EIS notes in the Livestock section that APHIS have not conducted predator control in the area for several years.

**46.17 COMMENT:** The 1,930 AUMs in the ISA Complex should be phased out to prevent unnecessary and undue degradation to the Grand Gulch Complex from cattle. The continued presence of cattle dung and the tendency of cattle to generate apparently random trails impairs scenic and recreational values. Current livestock grazing should be moved to other BLM lands that lack outstanding wilderness characteristics. Any negatively affected livestock producers should be given special leasing incentives or other inducements to mitigate possible short-term financial hardship that might result from moving livestock to another area. The currently proposed 2.5 miles of water pipeline and spring development should not be allowed. The approximately 4,680 acres of planned "land treatment" and the seven planned reservoirs should not be allowed. [Utah Wilderness Coalition]

**46.17 RESPONSE:** The Wilderness Act expressly provides for continued livestock grazing in designated wilderness areas. The land treatment and livestock reservoirs would not be allowed with wilderness designation, as noted in the EIS analysis.

**46.18 COMMENT:** The Draft EIS is inconsistent in the discussions of access for livestock operators. [State of Utah and Damian Fagan]

a. This discussion indicates that the entire complex would be closed to OHV use except for some specified uses. These uses would include access by livestock operators to maintain range improvements and care for livestock. This position appears to be contradicted by the blanket statement on page 34 (livestock) that, "Closing of existing ways would inconvenience some operators who use existing ways for livestock management." From this statement, one would conclude that if a livestock operator had an existing use of a way within the WSA, it would not be granted in the future.

b. In the proposal, there is a section that deals with authorized occasional and short-term vehicular access (ORV) for maintenance of approved livestock developments. I do not understand this clause, since motorized use within wilderness areas is left for emergency only. How can this be?

**46.18 RESPONSE:** See the response to Specific Comment 29.38.

**46.19 COMMENT:** My grazing allotment is the Slick Horn Allotment on Cedar Mesa. It borders the Grand

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

Gulch Primitive Area. I think it's deceitful to represent the roads in that area as being ways. Now someone back in Washington, not knowing our situation here, would read that and might think that was a very insignificant or unimportant road or trail. Not so. These roads are bladed twice a year and more often if they need to be. They have water bars and drain ditches. You can drive big trucks on them. I did so today in hauling thousands of gallons of water to Sheep's Flat, Coyote, Joshua, and Cody. We've done that now for about 25 years. On the allotment are many roads. There are many reservoirs, there are thousands of acres of grass seeding, there are many developed springs and trails. There are troughs which catch water, many at the head of the canyons. There are corrals, fences, cattle guards and several old CC camps on my allotment. There are several oil well sites. I have leases on about 10 to 12 State school sections, of which I have developed some and will develop others. In the Point Lookout area I recently developed a State school section planting crested wheat grass. [Preston Nielson]

**46.19 RESPONSE:** BLM has determined that certain vehicle routes in the area do meet the criteria as defined for roads, and these roads have been excluded or cherry-stemmed from the ISA and the surrounding WSAs. These roads are shown along with the heavy boundary lines on the WSA maps. Other routes do not meet the criteria as defined for roads, and these are known as ways and are included within the WSAs. The ways are not specifically shown on the maps, but are listed under the Naturalness narrative in the Grand Gulch portion of Volume V. Access to State sections will continue to be allowed, as needed, and as legally required.

**46.20 COMMENT:** San Juan County is approximately the size of the State of New Jersey, with 7,885 square miles. About 86 percent of this area is owned by the Federal Government. Thus, the recommended phasing-out of grazing within the ISA Complex should be relatively easy to manage since so much other grazing land of equal or greater quality remains available for livestock on Federal land where no serious conflict with wilderness values would result. Thus, the seven livestock operators in the ISA Complex should not be unduly impacted and BLM should make reasonable efforts to ensure that preventable hardships not occur. Consumption of forage by cattle in the ISA Complex only accounts for \$9,650 of ranchers' returns to labor and investment. Annual Federal revenues derived from livestock grazing in the ISA

Complex is less than \$3,000. [Utah Wilderness Coalition]

**46.20 RESPONSE:** Livestock grazing would not be phased out of the Grand Gulch Complex with any alternative. Livestock grazing is permitted within designated wilderness areas as outlined in Appendix 1, Part 1.

**46.21 COMMENT:** The only deficiency I can find in your analysis is that it undervalues the scenic qualities of the region. Admittedly, the cultural resources (i.e., cliff dwellings, pictographs, etc.) are the most distinctive features of Grand Gulch, but the canyons and their setting are spectacular in their own right. Both times I have hiked Grand Gulch there was flowing water throughout the canyon, and this undoubtedly added to my appreciation of the place. However, my last hike, this past spring, was from Collins Canyon to the San Juan River, where there are few cultural sites, and I felt that the canyon itself was as beautiful as any I have seen. [Robert Hassell]

**46.21 RESPONSE:** BLM has recognized the high quality scenery. The EIS shows that 96 percent of the ISA Complex has Class A or Class B scenery. These are the two highest ratings for visual quality.

**46.22 COMMENT:** The All Wilderness Alternative will best protect cultural resources. [Sierra Club, Cache Group, et al.]

a. One of the most positive effects of wilderness designation will be the increased protection of cultural resources. As the Draft EIS indicates, past experience has shown a direct correlation between increased access and increased vandalism and looting of cultural sites. Experience has also shown that the "land treatments" (chainings) proposed for the area can also have a devastating impact on cultural resources. Any alternative other than the All Wilderness Alternative fails to protect a great deal of the Grand Gulch Complex's most valuable resource--the cultural resource. It is inconceivable that anyone would even be considering not protecting this area in order to produce a few more AUMs. It can only result in the continued escalation of looting and vandalism of cultural sites.

b. Important Anasazi cultural ruins have been found throughout the canyons here. Wilderness designation will best protect these artifacts from vandalism, theft, and development pressures. The 1964 Wil-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

derness Act clearly states that such protection is valid for wilderness designation.

**46.22 RESPONSE:** See the response to General Comment 20.1.

**46.23 COMMENT:** Special emphasis on law enforcement efforts needs to be instituted to significantly raise the risk of arrest and prosecution of persons disturbing the lithic scatters, walled fireplaces, pictographs, petroglyphs, pithouses, cliff dwellings, towers, pottery shards, and kivas. In addition to increased law enforcement efforts, public education programs need to be developed to encourage hikers and campers to report and possibly photograph persons damaging or stealing from archaeological sites. Rewards could be established to pay citizens providing such evidence when it leads to arrest and prosecution. [Utah Wilderness Coalition]

**46.23 RESPONSE:** See the response to General Comment 20.4.

**46.24 COMMENT:** The Grand Gulch Complex (GGC) has long been recognized as one of the premier natural areas in the nation for primitive and unconfined recreation, and educational and scientific studies. The GGC includes three major desert canyons and numerous side canyons stretching over a combined distance of 190 miles that provide outstanding backpacking opportunities. In addition, there are an estimated 12,360 archaeological sites in the GGC of scenic and scientific interest, 8,240 of which could be National Register eligible. These are mostly the remains of the Anasazi Indian populations which occupied the GGC between 200 A.D. to 1300 A.D. [Utah Wilderness Coalition]

**46.24 RESPONSE:** The EIS notes the significant cultural resources found in the area.

**46.25 COMMENT:** The EIS statement of "at least 10" understates the number of routes which exist between Grand Gulch and the mesa top. Most of the routes involve only easy rock scrambling. [John Veranth]

**46.25 RESPONSE:** It is correct that, aside from up to 10 major routes, an adventurous visitor could find a number of other routes to climb between the canyons and the mesa. They would have varied degrees of difficulty, requiring walking, scrambling, climbing, and/or scaling.

**46.26 COMMENT:** The Draft EIS understated income generated by wilderness-related employment. Grand Gulch, for example, currently supports six commercial outfitters and guides, based on commercial use of 2,000 RVDs (10 percent of the total 20,000 RVDs as stated on p. 31 of the area analysis). Using the \$4.10 Statewide average for the value of a wilderness, RVD gives a total outfitter-based income of \$8,200 ( $\$4.10 \times 2,000$ ), hardly enough to support one outfitter, let alone 20. Clearly the proportion of wilderness RVDs attributable to commercial use should be valued much higher in the Draft EIS analysis. If, for example, such use were valued at \$50/day (a reasonable figure), the increase in income generated by wilderness designation would be much higher, about \$9,150 based on projected increased use of  $1,838 \times 10 \text{ percent} \times \$50$ . The Draft EIS, then, does not take into account its own data. By valuing all recreation at the Statewide noncommercial average of \$4.10, the Draft EIS estimates recreation-related sales attributable to designation of Grand Gulch at only \$7,535 at the end of the 20-year period. In fact, using more reasonable figures, the projected increase due to commercial use alone exceeds that amount. Adding commercial use to noncommercial use for Grand Gulch ( $\$50 \times 183$ ) + ( $\$4.10 \times 1,655$ ) gives a more realistic figure of \$15,935. By ignoring the commercial component of wilderness recreation, the Draft EIS underestimates the economic impact of increased recreation by almost 50 percent. The Draft EIS should recalculate these figures for each WSA where commercial and noncommercial uses were not differentiated. The results may further demonstrate the economic advantages of wilderness designation, which should be considered in the summary comparison of alternatives.

To further illustrate this critical point, the Draft EIS should compare aggregate figures for projected employment and income in each WSA. Again considering Grand Gulch, recreation-based increases compare favorably with grazing-related increases. The Draft EIS states that the current 1,930 AUMs involving seven permittees could be supplemented by an additional 1,118 AUMS (Volume 5, p. 30, Grand Gulch section). Even using the inflated \$20/AUM sales/output figure (Volume 1, p. 357, table 9), this would result in an increase of only \$22,360 and 0.58 of one job, using the direct employment factor of  $0.00053 \times 1,118$ . The increased jobs in recreation resulting from designation would be  $(183 \times 0.0012) + (1,655 \times 0.0004)$ , using the correct ratio based on WSA

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

data. This gives 0.88 jobs, small, but more than from grazing. And it seems likely that the management costs incurred by BLM would be less for recreation than for grazing, given the heavy capital costs associated with intensive grazing practices. This kind of analysis, if performed Statewide, would show that wilderness designation would likely create more jobs than grazing could. The Draft EIS summary analyses should reflect this. [Utah Wilderness Coalition]

**46.26 RESPONSE:** The economic analysis for commercial operations does not use \$4.10 per day. The EIS uses \$50 average revenue per day for each customer of commercial recreation operators on land-based tours. This is explained in Appendix 9 of both the Draft and Final EIS. The EIS shows recreation use of the area generates an estimated \$26,000 in sales to commercial outfitters. However, none of the outfitters live in the local area, therefore little of the money is spent in San Juan County. Additional narrative has been added to Volume I related to potential new jobs due to wilderness designation. The Final EIS shows that on a Statewide basis, wilderness designation would not result in significant changes in the number of either grazing-related jobs or wilderness-related jobs.

**46.27 COMMENT:** A downplaying of the positive effects of wilderness recreation appears in at least one area analysis, and probably in others. Although the Draft EIS does not estimate increased recreation use for most WSAs, it does for Grand Gulch: 58 percent over the 1984 level, compared to a projected 48 percent increase without designation (Volume 5, p. 35 and 32). But this increase is dismissed as insignificant on p. 38, owing to the existing popularity of the area. If Grand Gulch is unlikely to increase significantly, what about other, relatively unknown WSAs? Wilderness designation for all WSAs would increase wilderness-related visitation without focusing use [and hence impacts] on a few areas as is now the case. The Draft EIS should consider this potential increase in its employment and income analysis, for it may well be significant. The "designation effect" is recognized as a potential source of increased employment opportunities for the 45 commercial outfitters that use the WSAs. However, the Draft EIS claims that this increase would be insignificant to the State and even to local communities. Analysis of one individual WSA (Mancos Mesa) suggests otherwise. The Draft EIS states that recreation use of Mancos Mesa would increase from 402 to 5,144 RVDs/year, assuming 2 percent annual growth increase. The Draft EIS states

that "commercial outfitting oriented to primitive outdoor activities would benefit." This is the epitome of understatement. According to the Draft EIS, the increase in outfitting jobs in this area alone would be equivalent to one-fourth of the loss in potential jobs Statewide in grazing (that is, two jobs). If employment gains from designating all WSAs were added together, and appropriate recreation-based employment ratios were used, it seems clear that wilderness designation would more than compensate for the loss of potential future jobs in grazing. This reflects the fact that WSAs provide rather little in the way of grazing-related employment. The Draft EIS also suggests that nondesignation would allow a (relatively minor) 5 percent increase in mining-related employment. However, the Draft EIS seriously overestimates the potential for future WSA mining activities. An objective economic analysis would show a net positive gain for local and regional economies with wilderness designation. The Draft EIS should carefully assess this question in the comparison of alternatives. [Utah Wilderness Coalition]

**46.27 RESPONSE:** See the responses to Specific Comment 45.19, and General Comments 21.17 and 24.8.

**46.28 COMMENT:** This area has received national attention and has been the topic of books and magazine articles. Nationally, this is probably the best known of the BLM WSAs in Utah. [John Veranth]

**46.28 RESPONSE:** BLM concurs with the comment. The popularity of the area is reported in the Final EIS.

**46.29 COMMENT:** Numerous natural arches, rinceps, and pinnacles line the Gulch and side canyons especially in: (1) Bullet Canyon, (2) Collins Canyon, (3) Kane Canyon, (4) Johns Canyon, (5) Pine Canyon, (6) Polly's Canyon, (7) Slickhorn Canyon, and (8) Step Canyon. Only complete wilderness protection, as proposed by the Utah Wilderness Coalition, can truly protect the outstanding and unique natural features found in Grand Gulch and its side canyons. [Sierra Club, Cache Group]

**46.29 RESPONSE:** The EIS notes that cliffs, pinnacles, knobs, and arches are present in the ISA Complex. Only major blasting and removal of rock would affect cliffs, knobs, or other geologic features. Activities of this magnitude are not expected in the Grand Gulch Complex.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

**46.30 COMMENT:** The development of a specific Wilderness Management Plan would govern use and protection of the Grand Gulch Complex (GGC) wilderness. It should be formulated with input from wilderness users and archaeologists. Use of helicopters or mechanized vehicles of any type, except to evacuate injured persons, should be excluded from the GGC. Ranger patrols should be restricted to foot travel and horseback within the GGC. [Utah Wilderness Coalition]

**46.30 RESPONSE:** A wilderness management plan would be prepared by resource management specialists and with input from the public.

**46.31 COMMENT:** The rights-of-way for communication sites is contrary to the Wilderness Act of 1964. Transmission towers or relay stations should not exist within the boundaries of the Grand Gulch wilderness and these rights-of-way should be eliminated. [Drew Leemon]

**46.31 RESPONSE:** The radio repeaters are used by BLM for administrative purposes. According to BLM's interm management policy, they are nonimpairing to wilderness values and can remain in the ISA Complex. Relocation options would be addressed in the wilderness management plan referred to in Specific Comment 46.30, if the area is designated wilderness.

**46.32 COMMENT:** The Draft EIS makes no mention of the intended management of the area inside the Polly Pasture loop road. What are the plans for this area and how will the management of this area affect the surrounding area proposed for wilderness? [John Veranth]

**46.32 RESPONSE:** The area inside the Polly Pasture loop road will continue to be managed in accordance with the BLM land use plan. See the San Juan RMP.

**46.33 COMMENT:** Other special designations should be considered by BLM. [State of Utah and Dennis Willigan]

a. Grand Gulch ISA Complex has the second highest wilderness-quality values in the region. Conflicts are moderate to low. Conflicts with livestock use and potential wildlife habitat improvements could be eliminated by a WSA boundary that is restricted to the canyon rims. Wilderness designation may have a detrimental affect on cultural values in this area because of increased activity and vandalism and the legal lim-

its imposed on mechanized law enforcement activities. An administrative designation, possibly an Outstanding Natural Area or Research Natural Area, would allow more active management of the critical cultural resources in the area.

b. In addition to wilderness designation for the GGC, other BLM management options should be considered to protect the GGC's unique resource values. These include the Area of Critical Environmental Concern (ACEC), Research Natural Area (RNA), National Natural Landmark (NNL), scenic area, and Outstanding Natural Area (ONA) designations. BLM should consult 43 CFR 8223.0-5, Section 103(a) of the Federal Land Policy and Management Act, the National Landmarks Program established by the Secretary of the Interior in 1962, 43 CFR 8352.0-5(a) and 43 CFR 8352.0-6(b), and wherever possible seek additional designations for the GGC. It seems clear from BLM's descriptions of the ISA Complex that it qualifies for ACEC, RNA, NNL, scenic, and ONA statuses in addition to wilderness. These designations, in addition to BLM's recommended wilderness designation will assist in protecting the important archaeological and scenic resources in GGC.

**46.33 RESPONSE:** Grand Gulch has been managed as a designated Primitive Area since 1970. The labels of Primitive Area, Outstanding Natural Area, Research Natural Area, or other special administrative BLM designations are being superceded by the more general title of Area of Critical Environmental Concern (ACEC). The Draft San Juan RMP indicates that Cedar Mesa (with somewhat different boundaries than the ISA Complex) would be managed as an ACEC. Wilderness designation by Congress would amend the BLM land use plan to add certain wilderness management criteria, which may be somewhat different than the ACEC management provisions. Regarding limitations on law enforcement related to cultural resources, see the response to General Comment 20.1. Also, see the response to Specific Comment 46.29.

**46.34 COMMENT:** I concur completely with the Proposed Action in the Draft EIS and strongly support All Wilderness designation for the Grand Gulch Complex. Perhaps such designation will lead to the creation of a national park on Cedar Mesa, encompassing all the current WSAs and protecting this outstanding region for future generations. [Jack Spence]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

**46.34 RESPONSE:** The response to General Comment 3.30 is applicable to Cedar Mesa, as well as to the San Rafael Swell.

**46.35 COMMENT:** Wilderness designation coincides with Natural Zone and recommended wilderness in the Glen Canyon General Management Plan (GMP) for these areas: Burning Hills, Escalante Canyon Tract 5, Horseshoe Canyon South, Fiddler Butte, Little Rockies, Grand Gulch, and Dark Canyon. [National Park Service]

**46.35 RESPONSE:** The Final EIS describes the relationship of the Grand Gulch Complex to adjacent lands. Approximately 8.5 of the Grand Gulch Complex boundary is in common with the Glen Canyon NRA.

**46.36 COMMENT:** The handling of road corridors in the EIS has been inconsistent. For example, in the Grand Gulch ISA Complex, a narrow road corridor was "cherry-stemmed" into the WSA in several places. On the Sids Mountain WSA, road corridors 0.33 mile wide (according to the map in Volume VI) were "cherry-stemmed" into the WSA. Narrow corridors such as those in the Grand Gulch ISA Complex should be used in all WSAs. In some WSAs, a "way" was used to limit the size of the WSA, while in other WSAs, similar "ways" were determined to be not significant and were included as wilderness. Examples of the former are the Westwater Canyon Partial Wilderness Alternative and the Partial Wilderness Alternative for the North Escalante Canyons/The Gulch ISA (the "way" in Horse Canyon is used to exclude a major part of the WSA). Examples of the latter are in the Grand Gulch ISA Complex: a "way" extends from Sheiks Flat to the rim of Bullet Canyon; another, in Polly's Pasture, goes to the head of the Government Trail. Both "ways" were treated as wilderness. If "ways" in all of the WSAs were handled like they were in the Grand Gulch ISA Complex, the size of many WSAs would be substantially increased. [Owen Severance]

**46.36 RESPONSE:** The determination of which vehicle routes meet the criteria for roads and for ways was done by field personnel familiar with each area. This was done with individual judgment on interpretation of a standard definition, as explained in the response to General Comment 4.1. A reasonable level of consistency was achieved on a Statewide basis. The "ways" in some WSAs are essentially wash bottoms that extend from one side of the wash to the other. In

these cases the "ways" are broader than in cases where ways were established by the use of vehicles.

**46.37 COMMENT:** 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 percent) of the State's seven planning districts. San Juan County where the GGC is located has the highest percentage of persons in poverty (35.8 percent) of all Utah counties. Wilderness designation of the ISA Complex together with the additional areas recommended by the Utah Wilderness Coalition could have a significant impact on the promotion of tourism and thus substantially lower the high levels of poverty in San Juan County where more than one of every three persons is believed to be living below the poverty line. The Draft EIS indicates that new public awareness of the GGC arising from wilderness designation could result in an increase in recreational use of as much as 31,656 annual visitor days. This would be a 58-percent increase over BLMs current estimated annual visitor days. Related local expenditures "would be significant to individual businesses providing recreational equipment and services, to the commercial outfitters who now use the ISA Complex, and to those who may begin to use the ISA Complex." Recreation-related Federal revenues could also be increased. [Dennis Willigan]

**46.37 RESPONSE:** The EIS indicates that recreation visitation with the No Action/No Wilderness Alternative would be 29,818 annual visitor days by the end of a 20-year period. With wilderness designation, the comparable projected visitation would be 31,656 annual visitor days. The difference of 1,838 visitors per year by the end of the 20-year period would result in less than \$6,000 per year added to the economy. Only a portion of this would occur in San Juan County and would not significantly reduce the problem of poverty in the county. The increase in visitation would result from increases in population more than as a result of wilderness designation.

**46.38 COMMENT:** The Pocket Map #1 is not correct in showing the BLM wilderness proposal. So far I have found seven WSAs that have the wilderness proposal shown incorrectly (3, 19, 20, 40, 42, 66, 72). However, that is a fairly minor problem compared to the maps in the text of Volumes II through VI. Two of the three WSAs that I have checked so far have the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 46: GRAND GULCH ISA COMPLEX (CONTINUED)**

boundaries shown wrong on the map in the text. I visited the San Juan Resource Area Office to see the correct maps. In Volume V, the Grand Gulch map leaves out two "cherry-stemmed" "ways" in the Polly's Island area and the Dark Canyon map incorrectly shows the WSA boundary running down the bottom of Fable Valley instead of along the rim. At the San Juan Resource Area Office I was told that the "official" maps are located in each District Office. This creates a major problem for me: how can I find out the correct WSA boundary proposals without driving all over the State? I need accurate maps in order to be able to make intelligent comments on the EIS. Most of the maps in the SSAs were unreadable, so they aren't any help. How are you going to help me (and other interested people) get accurate maps? I would appreciate a reply as soon as possible since I have a lot of work ahead of me. [Owen Severance]

**46.38 RESPONSE:** The maps in the Final EIS have been redone and checked to assure consistency with the inventory decisions. The inventory decision document was made available to the public when it was printed in 1980. That document contains the "official" maps. The cherry-stemmed roads in the Polly's Island area have been shown in the Final EIS.

**SECTION 47**  
**ROAD CANYON WSA**

**47.1 COMMENT:** In 1864, Navajos were gathered by Kit Carson and taken to Fort Sumner, New Mexico, and were held captive there for 4 years. After 4 years of suffering, those who were held captive conceded to giving up a major portion of their lands. But there were Navajos who remained north of the San Juan River, all the way up to LaSal Mountains. They claimed they did not concede to giving up their land, so this is still Navajo country to them. And the comment I wanted to make is that Navajos and other Indians should not be prohibited nor restrained from entering these areas for these different reasons because of their survival. And it's important to them that they have access to these areas. [Utah Navajo Development Council]

**47.1 RESPONSE:** Wilderness designation would not prevent the Navajos from entering the area. They would be able to use the wilderness in a manner similar to others, without motorized vehicles and equipment.

**47.2 COMMENT:** Some of the deletions BLM makes in its Partial Wilderness Alternative are justified by boundaries which are the result of inventory policy violations. The inventory policy required boundaries to include all natural areas and to be drawn up to the edge of these significant intrusions. The western and eastern boundaries follow a cliff rim between 0.5 mile and 2 miles from major impacts. Correction of those policy violations (using significant human impacts to draw the boundary along) will add natural areas to the WSA and correct the "irregular" boundary problems. In the east, between Barton Range Canyon and Comb Wash, a large natural area with rugged badlands was deleted from the study area. BLM was required to exclude lands which had significant impacts. In this case, the boundary was moved over 3 miles from the last impact. A large natural area was excluded from study. This violates the inventory study process. [Utah Wilderness Coalition]

**47.2 RESPONSE:** See the response to General Comment 3.1.

**47.3 COMMENT:** BLM is to be commended for its recommendation to preserve 45,000 acres of Road Canyon's wilderness. However, the decision to exclude the scenic Valley of the Gods portion of the unit is not justified. By arguing the road outside the WSA impacts opportunities for solitude, BLM is creating a nonwilderness buffer zone around the unit. BLM should use the road as a boundary since it would be an identifiable, manageable boundary. The shallow canyons leading from this road provide screening and excellent dayhiking opportunities, readily accessible from the road. [Utah Wilderness Association]

**47.3 RESPONSE:** BLM's Proposed Action in the Final EIS includes the Valley of the Gods.

**47.4 COMMENT:** The rationale for the proposed Partial Wilderness Alternative is in error. [Utah Wilderness Coalition and Damian Fagan]

a. I do not understand why or how BLM came up with their Partial Wilderness Alternative of 45,720 acres. This was not discussed in the analysis, except in a very weak and ineffective response. The lower portions of Lime Creek and some of the upper stretches of the Valley of the Gods were deleted. A total of 6,700 acres that conform to all the rules about recreation potential and visual screening from the dirt road that loops through the Valley of the Gods. So what is the rationale for the deletion? To exit



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 47: ROAD CANYON WSA (CONTINUED)**

a wilderness area, one must come into contact with some type of land from being proposed. Lines are fine on maps, but there needs to be some buffering land between these access points and the wilderness areas. One does not step across some type of sound barrier 20 feet into the wilderness area.

b. There are problems with the smaller partial wilderness recommendation. The rationale supplied by BLM for deleting the canyons and the associated mesa tops does not follow the wilderness study policy. The 6,700 acres of area BLM claims lack solitude include scenic cliffs and distant vistas over and beyond the Valley of the Gods. These cliffs are natural and have no management or future development conflicts. BLM drops this area because of lack of wilderness grade solitude. The wilderness policy requires that some portion of the unit possess this quality of solitude, but the final boundary is not chosen on the basis of solitude alone.

**47.4 RESPONSE:** BLM's Proposed Action in the Final EIS is the All Wilderness Alternative. The rationale is summarized in Appendix 11 in Volume I.

**47.5 COMMENT:** The best way to define WSA boundaries would be to use topographic features where possible and use section lines only where there aren't any clearly defined topographic features. In the EIS, topographic boundaries are mainly used to reduce the area of WSAs from their sizes in the initial inventory. Examples are: the Spencer Flats area in the North Escalante Canyons/The Gulch ISA Partial Wilderness Alternative and the Road Canyon WSA Partial Wilderness Alternative. Examples of WSAs where topographic boundaries could have been used to enlarge the WSAs but weren't are: North Stansbury Mountains WSA, the Deep Creek Mountains WSA, and the Indian Creek WSA. [Owen Severance]

**47.5 RESPONSE:** See the response to General Comment 2.11.

**47.6 COMMENT:** Both Road Canyon and adjacent Lime Canyon provide excellent opportunities for hiking and other primitive recreational activities which will be best protected through wilderness designation as proposed by UWC. The final recommendation for wilderness should include the rugged canyons that reach Comb Wash to the east beyond the WSA area. [Sierra Club, Cache Group]

**47.6 RESPONSE:** Areas outside of the WSA are not part of the BLM wilderness study. See the response to General Comment 3.1.

**47.7 COMMENT:** BLM alleges that the portion being deleted has a very irregular boundary which limits the unconfined primitive recreation experience. BLM's solution is to choose a canyon rim of Road Canyon for the northern boundary of the partial wilderness recommendation. The deletion of one area for reasons which are not supported in the Wilderness Study Policy (lack of solitude in the southern part of the unit) now is used by BLM to justify more deletions. In this case the area being deleted does possess wilderness characteristics and has the same kind of boundary as does a majority of the partial wilderness recommendation. BLM is inconsistent in applying its criteria on wilderness recommendation boundaries. In one area the same boundary is recommended and in another area, a similar boundary now is "irregular." BLM fails to identify why this boundary presents management problems preventing wilderness management. [Utah Wilderness Coalition]

**47.7 RESPONSE:** Parts of the Valley of the Gods are more susceptible to random ORV use than most other portions of the WSA. Enforcement of an ORV closure now is viewed as an administrative problem, rather than a problem of manageability. See the Glossary in Volume I. Also, see the response to Specific Comment 47.4.

**47.8 COMMENT:** The Draft EIS phrases the reasons for choosing which lands are included in the Partial Wilderness Alternative. The wording indicates that BLM is only going to analyze that portion of the area they rate as "outstanding." BLM should look at the whole area. BLM is not allowed to use an arbitrary rating system to degrade wilderness values. Here BLM rates solitude and recreation without giving any method or describing any method's application to this area. We request a full explanation of this process. The use of rating systems like this is in conflict with the Wilderness Study Policy. Congress looks at the area as a whole and designates lands as wilderness which do not have outstanding opportunities in every acre. To qualify, the area must have this attribute in part of the area. The value of additional areas to the whole wilderness area should be assessed. [Utah Wilderness Coalition]

**47.8 RESPONSE:** The All Wilderness Alternative looks at the entire WSA. Additional areas outside the

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 47: ROAD CANYON WSA (CONTINUED)

WSA were evaluated during the inventory process, and only the WSAs were found to meet the criteria for further study. See response to General Comment 3.1. Also see the responses to General Comments 9.8 and 22.3.

**47.9 COMMENT:** The description of roads and cherry-stems is not accurate. [Robert Adams, Richard Christie, Thea Nordling, Jean Soko, Ann Wechsler]

a. The Lime Creek drainages and Valley of the Gods should be included; dropping them from the WSA seems arbitrary and short-sighted. Also, I see no justification for cherry-stemming the 7-mile jeep trail, as it is already closed and revegetated.

b. I field checked the 7-mile vehicular way which goes out on the plateau between the two forks of Lime Creek. I agree with BLM assessment that this way does not represent a "road," and that it would quickly rehabilitate and become invisible if closed off consequent to wilderness designation. Because this way travels through numerous exposures of slickrock, whoever bladed it used their machinery to knock trees out of the way and could not dig into the ground to create a road cut as such. The way is within a couple of storms of being cut through by erosion at several washes, and the tire ruts are being industriously filled in by slit at other points. The thick pinyon-juniper vegetation makes the way invisible unless you are standing right on top of it.

c. I do not understand the need to cherry-stem a road to the State sections in the heart of the WSA. Other study areas plan to exchange these State lands. Why is this area different? It appears that by leaving that road open and excluding the State lands, BLM has severely impaired the wilderness character of this WSA.

d. I also oppose the intrusion into the center of the WSA by a 7-mile jeep trail since it is not used by livestock operators or BLM, according to your agency.

e. We maintain our fences with chain saws. We use pickups to transport materials to and from them. These roads, be they ways, by whatever definition you want, are important. There's also another road -- 7-mile road that runs on the mesa south of Lime Canyon. No one likes to call it a road in BLM, but the fact of the matter is it is a road. You can get a vehicle

across it. I've maintained it with a shovel on a number of occasions. And contrary to what is stated in the Road Canyon booklet, it is used.

**47.9 RESPONSE:** Road Canyon and Lime Canyon are within the WSA and are included in BLM's Proposed Action for wilderness designation. Vehicle travel routes which meet the definition of a road now exist to the three State sections between the two canyons; and consequently these must be cherry-stemmed to exclude them from the WSAs. The Final EIS indicates that State sections would not be exchanged (see Chapter 1 in Volume I).

The 7-mile jeep trail (or way) exists, but has been revegetated as explained in the Road Canyon narrative on naturalness. During the inventory phase, BLM determined that this route, although originally bladed, no longer meets the definition of a road and therefore it has been identified as a way. The 7-mile jeep trail is not cherry-stemmed from the WSA. See the responses to General Comments 4.1 and 4.2.

**47.10 COMMENT:** The complex concept should be applied to the Road, Fish Creek, and Mule Canyon WSAs as well. There exists in this area an excellent opportunity to create a contiguous wilderness area extending from Highway 95 south to Valley of the Gods. [Drew Leemon]

**47.10 RESPONSE:** The Complex concept was used for Grand Gulch and Dark Canyon primarily for ease of reporting and because the units were immediately adjacent and not fully separated by roads. It is not applicable to Road, Fish Creek, and Mule Canyon WSAs because these units are separated by State Highways and/or County Class B roads. Analysis and reporting each of the three WSAs individually has no effect on BLM's Proposed Action.

**47.11 COMMENT:** Contrary to the Utah BLM Draft EIS statements, with the exception of a short stretch along the Valley of the Gods road, the colorful badlands area below the cliffs in the Valley of the Gods which fall within the WSA are quite interesting to explore on foot (particularly up behind balanced rock) and quickly take you out of sight and sound of the road in Valley of the Gods and into a natural environment which afforded me complete solitude despite the fact there were nine vehicles full of campers or sightseers on the Valley of Gods road at the time. [Richard Christie]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 47: ROAD CANYON WSA (CONTINUED)**

**47.11 RESPONSE:** BLM has determined that portions of Valley of the Gods and lower Road Canyon are lacking in outstanding solitude.

**47.12 COMMENT:** Access to this area, even foot traffic through Grand Gulch, is having a significant impact. We suggest that BLM consider controlling access to this area to minimize these impacts. [Wasatch Mountain Club]

**47.12 RESPONSE:** The need to limit or disperse access to the area would be considered during the preparation of a detailed wilderness management plan, subsequent to wilderness designation.

**47.13 COMMENT:** The text of the Draft EIS seems to imply that the area excluded from the preferred alternative is not outstanding. But no data is provided to support the conclusion. The biggest management difficulty mentioned seemed to be the cherry-stemmed roads on the plateau. I would suggest that all of the plateau roads be closed except those leading to the Cigarette Springs area and the northern access points. In other words, the two roads heading south should be closed. This would reduce vehicular traffic on the mesa top and still provide access to a popular day use part of the wilderness. Also, I was surprised to learn that no alternative was evaluated which would have closed the historic jeep trail between Road Canyon and Fish Creek Canyon, making the two areas into one larger area. Such an alternative should have been considered. The joining of the two areas would considerably enhance the wilderness qualities of both. Also, an alternative should have been considered which involves closing the jeep roads in the Valley of the Gods. This would have greatly reduced vehicular access to the fragile canyon areas of the Road Canyon WSA. [Roger Jenkins]

**47.13 RESPONSE:** The wilderness study process does not provide for the closure of existing public roads or customary travel routes which meet the definition of a road. BLM has no authority to close the routes mentioned in the comment as they are existing County Class B roads.

**47.14 COMMENT:** According to BLM, roads outside of some WSAs intrude into the solitude, i.e., U-95 outside Cheesebox Canyon, while in other WSAs they help add to the feeling of isolation, i.e., San Rafael Reef, I-70, and U-24. And in still others, i.e., Road Canyon, a dirt road in Comb Wash was enough to cause elimination from BLM proposal of the flat below

the canyon. This is inconsistency at its worst. Observation of roads outside the WSA are not necessarily intruding and may actually, as a comparison, emphasize the remoteness of the users recreational experience. Why wasn't this reasoning used for Cheesebox Canyon and Road Canyon WSAs? It should have been. [Michael Salamacha]

**47.14 RESPONSE:** Each WSA is evaluated on a case-by-case basis. In some instances, outside activities intrude on solitude and in other cases they do not. The distance to the road, the level, and type of use on the road are considered in these determinations.

**47.15 COMMENT:** North of Mexican Hat, Utah, and southeast of Natural Bridges National Monument, Road Canyon is a misnomer, since there is no vehicle road in this natural, hiker's-choice canyon. [Utah Wilderness Coalition]

**47.15 RESPONSE:** Road Canyon is the official name shown on USGS quads and many other maps of the area although no road exists in the canyon.

**47.16 COMMENT:** BLM claims that other State lands present a management problem. In other wilderness recommendations, including those areas adjacent to Road Canyon, similar State land sections within the recommended area present no management problem. No difference is explained. The State now maintains a policy of exchanging State lands within BLM wilderness lands. Project BOLD now proposes giving BLM these lands within Road Canyon WSA in exchange for other BLM lands elsewhere. In conflict with the current State policy, BLM has no proof that these State lands are a management problem. [Utah Wilderness Coalition]

**47.16 RESPONSE:** As part of its comments on the Draft EIS, the State reversed its position on exchange of in-held State sections. Also, the State no longer proposes Project BOLD. See the response to Specific Comment 47.9. For the Final EIS, BLM has assumed that in-held State sections would not be exchanged; however, they would not present wilderness manageability problems unless the likelihood of development is foreseen. In the Road Canyon situation, three sections are cherry-stemmed and are outside of the WSA and no development or access needs are predicted for the other sections of State land; consequently, wilderness management would not be adversely affected.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 47: ROAD CANYON WSA (CONTINUED)**

**47.17 COMMENT:** BLM has not completed necessary inventories for archaeological resources, wildlife, threatened and endangered species, and other wilderness values. Completion of these inventories, many required in the planning process, will add more reasons supporting designation. [Utah Wilderness Coalition]

**47.17 RESPONSE:** The wilderness EIS process requires no special inventories for archaeological sites, wildlife, or threatened and endangered species. Inventory of wilderness values has been completed and presented in the EIS. The EIS is based on the best and most current information available, including consultation with the State Historic Preservation Officer, the Fish and Wildlife Service, and others. See the responses to General Comments 9.6, 13.8, 16.2, and 20.2.

**47.18 COMMENT:** The EIS states that there are four springs in this area. I don't know if that's true. I know there are at least three. It also states that these springs are all undeveloped. I know of three springs and every single one of them is developed, representing substantial impact of man's existence in the area. They're developed with either a trough or a trail, blasted with dynamite, and/or had the use of small heavy equipment. These springs occur in T. 39 S., R. 20 E., sec. 31; T. 39 S., R. 19 E., sec. 26; and T. 40 S., R. 19 E., sec. 1. I feel this points out severe deficiencies in this statement. [Robert Adams]

**47.18 RESPONSE:** The spring stated in the comment to be in Section 31 is in Section 32 which is State land (not WSA acreage). The spring in Section 26 is at the end of a cherry-stemmed road and is not considered to be within the WSA. The spring stated to be in Section 1 is in Section 2 (State land cherry-stemmed outside of WSA) and contains an historical wooden trough. The four springs (undeveloped) mentioned in the EIS are other springs and are on Federal land in the WSA.

**47.19 COMMENT:** Most of the oil and gas production in Utah is from the Paradox, Uintah, and Green River Basins and from the thrust belt. In 1984, there were 34,689,000 barrels of oil produced in Utah. None of this production came from WSAs. BLM estimates that 12 percent of Utah's proven and indicated reserves lie within WSAs. This is less than 0.4 of 1 percent of the U.S. proven and indicated reserves, which is an insignificant amount and is an overestimate. BLM's WSA contains 2.7 percent of the estimat-

ed natural gas reserves. However, quoting from the EIS, quote: "This is an overestimation because of the amount of natural gas estimated in wilderness study areas represents hypothetical and speculative amounts." The overestimation of oil and gas potential is shown even more clearly in specific WSAs. For example, the Road Canyon WSA, BLM estimates an oil potential of less than 10 billion barrels of which 3 million might be recoverable. The adjacent Fish Creek Canyon WSA is estimated to contain the same amount of oil potential. However, if a map of wells drilled in the vicinity of these WSAs is compiled, you will soon see that all of them are dry holes. The entire area has been perforated with wells. There have been wells drilled in every single unit. There have been 88 wells which have been drilled within 6 miles of the WSAs and only nine of these wells produced something. They have all since been capped and abandoned. BLM in the EIS for both of these WSAs indicates that the likelihood of recovery is low and the loss of development opportunity would not be significant if the areas were designated wilderness. I believe that BLM is correct in this assessment. However, it is ridiculous to assume there is any potential where there are 79 completely dry holes perforating the area. The 20 million barrels of oil potential and the 6 million barrels of estimated recoverable oil should be subtracted from total estimates. This is a significant point for if it is true for other WSAs, then the oil and gas potential for the Utah BLM WSAs has been grossly overestimated. [David Susong]

**47.19 RESPONSE:** See the response to General Comment 15.54. Current maps compiled by Petroleum Information Corporation show approximately 50 wells have been drilled in the nine townships containing the majority of Fish Creek and Road Canyon WSAs, an area totalling about 200,000 acres. If the wells were evenly spaced throughout the area (they are not), this would mean there is one drill test in every 4,000 acres - not a close spacing. Many of the abandoned drill holes had shows of oil and gas which indicates there were hydrocarbon accumulations present at one time. A 1987 review of the published literature did not change the f2/c2 rating of these two WSAs.

**47.20 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS pocket map, have potential for

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 47: ROAD CANYON WSA (CONTINUED)**

hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**47.20 RESPONSE:** See the response to Specific Comment 39.16.

**47.21 COMMENT:** The OIR (2) mineral and energy rating should be lowered. Oil and gas is rated f2 and the Draft EIS admits the likelihood for development is low. Wells drilled in the vicinity have been dry. Everything else is rated f1. Road Canyon WSA is completely unimportant for mineral development. [Utah Wilderness Association]

**47.21 RESPONSE:** OIR ratings have not been included in the Final EIS. See the response to General Comment 15.7. Exploration is likely to continue in the area even though no mineral extraction is predicted for the Road Canyon WSA.

**47.22 COMMENT:** Pre-FLPMA leases and claims are also inconsistently assessed. Areas being recommended and areas being dropped have these leases. Recent legal decisions and the wilderness management policy state that wilderness areas with claims and leases can be managed to protect wilderness values. The presence of these claims does not justify dropping this area from wilderness recommendation. [Utah Wilderness Coalition]

**47.22 RESPONSE:** BLM has not dropped this area from the Proposed Action alternative. See the response to Specific Comment 47.4.

**47.23 COMMENT:** Bald eagles and deer are the only animals which are mentioned in terms of potential impacts. Other species should be included. [Scott Mills]

**47.23 RESPONSE:** In the Final EIS, it has been determined that impacts to wildlife are not significant issues for this WSA; therefore the wildlife analysis has been deleted. Also, see the response to General Comment 16.1.

**47.24 COMMENT:** The document states that mountain lion are common but usual prey (mule deer) are not. This seems unlikely. [State of Utah]

**47.24 RESPONSE:** The reference to mountain lion (cougar) in the wildlife description has been deleted for the Final EIS.

**47.25 COMMENT:** Elimination of the major mesa tops, rich with archaeological sites, from wilderness designation appears to support destructive agricultural improvements. These improvements, the removal of the forest with bulldozers, are now not justified by their net costs. BLM fails to discuss this issue, yet it presents the only real reason mentioned supporting these major deletions. This issue needs to be openly presented and considered. [Utah Wilderness Coalition]

**47.25 RESPONSE:** BLM's Proposed Action, which is the All Wilderness Alternative, would forego the potential for about 700 acres of vegetation treatment in the Road Canyon WSA. A benefit-cost analysis is not necessary in the wilderness EIS. See the response to General Comment 24.5.

**47.26 COMMENT:** There is an inaccuracy on page 1 of the Road Canyon booklet. It states that--concerning Indians and wood gathering--that 323 permits were issued. It's my opinion that most of the Navajo Indians that gather wood in the Cedar Mesa area do not obtain permits. In fact, it's just been the last few years that BLM has hired rangers to check this. And I would submit that most of them even today that gather wood in this area do not have permits. Number of permits is a poor way to measure the use. [Robert Adams]

**47.26 RESPONSE:** Harvest of forest products (firewood and fence posts) is authorized by permit in designated areas. Firewood taken without a permit is done so illegally; however, with limited field staff, it is not possible for BLM to patrol and enforce all public lands. Data on permits is the best information available to determine the level of harvest use. See the responses to Specific Comment 42.27 and General Comment 17.2.

**47.27 COMMENT:** The impact on Navajo wood supplies should be analyzed. [Utah Navajo Development Council and David Adams, State Representative]

a. Cedar Mesa and Grand Gulch are a major resource of wood for the Navajo Indians living on the Navajo Reservation in the southern end of the county. And if this is designated as a wilderness, they would no longer be able to gather wood from these areas. Now, I know there are areas on the mesa that are not

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 47: ROAD CANYON WSA (CONTINUED)

designated; the areas that I know of are Grand Gulch, the Cigarette Springs area, and Cigarette Springs Mesa, which is designated in that area as the proposed wilderness. This is a major area of wood gathering activities for the Navajo Indian tribe. Now, that might not seem too significant to some of us, but that is their major source for heating and cooking. And it would be a definite impact on the Navajo tribe should this area be off limits to their gathering of their energy source.

b. Now, Navajos collect firewood from these areas to heat their homes, to cook their meals. This is a necessity because there is no electricity in the majority of the Navajo homes. The firewood is used in large quantities for traditional things. These include healing rights held by Navajos. These are used in traditional things: in Squaw dances, which is another official term used--enemy way thing; in fire dances, this is a 9-night thing; and also Yei-Bi-Chai dances, which also lasts 9 nights. And what is used also to cook meals for people who help in these activities, to cook meals for those who participate in the rituals, in the dances, and those who come there to watch. It is also used to provide firelight at night when the dances are held. Many of these squaw dances are held in different locations during the summer, depending on the number of people who are affected by the enemy spirits. The Navajos use live juniper--they cut these trees--to build hogans, which is the traditional dwelling place for Navajos, plus it is also used for a stove, and these ceremonials are held. They're used to build shade huts where meals are cooked and also to build livestock corrals. Now, the Navajos also use cedar branches and juniper branches for building shade houses where meals are cooked during meal times. And also they're used to enclose dancing areas for the fire dance and the Yei-Bi-Chai dances. And the Navajos use live juniper leaves. They use these--they burn the leaves and mix it with corn meal--or ground corn, to make cornmeal spread and other traditional foods. Many of these are used during the ceremonials. Navajos also pick pinyon nuts in these areas when they are available.

c. Cedar Mesa, Fish Creek and Mule Canyon have very important wood gathering areas for the Navajo people. Now this is maybe no consequence to you, because maybe you don't know what wood gathering is to the Navajo people. Sixty percent of these people have no running water. They have no electricity. They have no other way of heating their homes other than by wood. I work with the Navajo people and I

know what economic problems they have. And, without wood, they're going to go cold and they are not economically able to go elsewhere besides these areas to gather their wood. Its going to a tremendous impact upon them. In fact, I doubt you will be able to stop them from gathering wood there anyway.

**47.27 RESPONSE:** A large percentage of the Navajo wood supply is obtained from National Forest lands in the region. On BLM-administered land, many suitable wood harvest locations occur outside of the WSAs, and these will be made available consistent with the South San Juan MFP or the forthcoming San Juan RMP. Nearly all harvest in the past has occurred in readily accessible areas on the mesas which are not included in the WSAs. Wilderness designation would have no significant affect on the opportunity for wood harvest by the Navajos or by others. Harvest of pinyon nuts for personal, noncommercial use would be allowed in wilderness areas.

**47.28 COMMENT:** Now, we say that before the white man came, Indians depended very much on nature and its resources for survival. The land to the Navajo is mother earth. It provides the necessities of life: air, water, food, medicine, shelter, energy. Now, in return for these resources, Navajos present precious stones and corn pollen to the earth and bless the earth. They ask God for blessings on the mountains, valleys, plants, wild and domestic animals from the Holy Spirit Creator. Through this respect, reverence, and exchange of gifts, Mother Earth has provided resources abundantly to the Navajos. Navajos collect herbs from these areas for traditional healing, curative, and help maintenance purposes. They use these in traditional ceremonials, also. Ceremonials include a variety of sings: like fire dances, Squaw dances, Yei-Bi-Chai dances, and other rituals for healing the sick. Examples: ground broad-leaf Yucca is a remedy for vomiting, relieve heart burn, is used in the mountain chant. Big sagebrush is used to help in deliverance of children, for stomach aches, for headaches, for colds and fevers, as an ingredient in the life medicine used in the mountain chant. Ephedra is a remedy for venereal, kidney, and stomach problems, and as cough medicine. Some euphorbia plants are used as remedy for boils and pimples. Cliff Rose is used with sagebrush and other plants for colds and fever. It is used to soothe and medicate back pains and muscle aches. Many other plants are used for different purposes, in combinations or in mixtures. Different parts of plants are used. In some plants, only the roots are used, some are the leaves, and

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 47: ROAD CANYON WSA (CONTINUED)**

some the whole plant. [Utah Navajo Development Council]

**47.28 RESPONSE:** There are areas outside of WSAs on Cedar Mesa and other locations where these plants are available. Also, in the wilderness areas, harvest of these plants would be allowed for personal, noncommercial purposes.

**47.29 COMMENT:** In the Road Canyon WSA, there's a cherry-stem road that partially bisects this area. Off from this cherry-stemmed road in T. 39 S., R. 19 E., sec. 27, there's another road. This road crosses T. 39 S., R. 19 E., secs. 26, 27, and 35 and finally ends in T. 40 S., R. 19 E., sec. 2. We have established by use that this is a road. There's no mention of this development at all in the Road Canyon booklet. This road provides access to two reservoirs which must be cleaned. The road also provides access to several acres of slick rock, which contains pot holes. On occasion, we build temporary and permanent dams to expand the capacity of these pot holes and provide the much needed water. In addition, we use the road to feed protein blocks, particularly during the months of January, February, and March, virtually every year. They're used to maintain livestock health. And perhaps more importantly, they are used to more adequately distribute the livestock over the range and obtain better forage utilization. Perhaps the most important reason we need this road is at emergency feeding. During periods of heavy snow on this mesa, such as the 40 inches in the winter of 1978-1979, we needed to plow this road with a bulldozer to provide access to our cattle. Once the road was open, we made use of snowmobiles to gather the cattle and institute an emergency feeding program. Had we not been able to do this, we would have lost a substantial portion of our herd. I'm afraid under wilderness designation, this would not be allowed. This road also provides access to a State section T. 40 S., R. 19 E., sec. 2. We hold the State grazing lease on that property and we have plans to develop water and grazing resources in the future. We oppose an automatic trading of State in-holdings within all wilderness areas; therefore, I think this EIS assumption is invalid. Also, we use this road to locate and retrieve animals needing special veterinarian medical attention. The area is used as a calving range. Because of difficulty in calving sometimes animals do not have the strength to make it to the corral where they can receive adequate attention. This road provides us with access to these animals. [Robert Adams]

**47.29 RESPONSE:** The road described in the comment leading to Section 2, Township 40 South, Range 19 East, is cherry-stemmed as shown on the Road Canyon WSA maps in Volume V. As such, it is not within the WSA, is not part of the wilderness study, and will remain open to vehicle use.

**47.30 COMMENT:** BLM correctly has given much of the area the highest rating for its visual resources. Barton, Road, and Lime Canyons are rated to have Class A visual resources. BLM also correctly assesses the opportunities for wilderness activities as outstanding in each of these canyons for exploration, hiking, backpacking, climbing, and horseback riding. BLM is correct in its determination that the impacts present within Road Canyon are insignificant and do not impact the wilderness qualities of this area. [Utah Wilderness Coalition]

**47.30 RESPONSE:** The comment is consistent with the EIS information.

**47.31 COMMENT:** Of special note is the country to the north of Castle Butte (T. 40 S., R. 19 E., secs. 7, 8, and 9). This is broken terrain, allowing considerable solitude and opportunity for dayhiking, and is easily accessible from the northern-most point of the Valley of the Gods road. This country would allow easy dayhiking for the more intrepid travelers to the Valley of the Gods area. [Henry Wright]

**47.31 RESPONSE:** The EIS states that the WSA has opportunities for desert hiking.

**47.32 COMMENT:** One of the most widely visited and best known parts of this WSA is the Valley of the Gods. Its scenic escarpment, jutting ridges, entrenched canyons, pinnacles, and peaks give this area its outstanding wilderness activity. BLM proposed dropping the escarpment east of Franklin Butte, Pyramid Peak, and the escarpment east of Pyramid Peak. These are critical visual components of the Valley of the Gods. We recommend BLM only consider deletions of areas that have significant potential conflicts which outweigh the wilderness values of the area. We find no conflicts with preservation of these scenic treasures, critical to Utah travel industry. [Utah Wilderness Coalition]

**47.32 RESPONSE:** The EIS identifies high quality visual resources. Also, see the response to Specific Comment 47.3 and 47.4.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 47: ROAD CANYON WSA (CONTINUED)

**47.33 COMMENT:** BLM's assessment of visual resources is in error. [Owen Severance]

a. In the Deep Creek Mountains WSA, the claim is made that Class C scenic quality is "average." In the King Top WSA, areas having "low scenic values" are determined to be Class C. According to Appendix 7 in Volume I, Class C areas are "monotonous." I don't equate "average" with "monotonous." Average scenic quality should be rated Class B. One of the most glaring examples of mislabeling scenic quality occurs in the Road Canyon WSA in Volume V where the Valley of the Gods is rated as Class C instead of Class A.

b. The Draft EIS downplays the scenic values of the area. Why has Valley of the Gods been given a Class C scenic quality rating rather than a Class A rating? It has always been advertised as an area of unique and outstanding scenic quality. The Class C rating does not do justice to the area's values and should be upgraded.

**47.33 RESPONSE:** Visual resources were evaluated on the basis of the BLM VRM system as described in Appendix 7. Deep Creek Mountains, King Top, and Road Canyon are each different BLM Districts and are not in the same regional setting. The Draft EIS indicated that the Class C scenery is along the "southern and eastern edges" of the Road Canyon WSA. This includes flat or rolling terrain in the Valley of the Gods, but it does not include the free-standing buttes (which are outside the WSA) or the cliff formations. Nevertheless, the BLM Visual Resource Inventory, conducted as part of the planning process for the San Juan RMP, indicates that the Valley of the Gods portion of the WSA meets the criteria for Class B scenery. The Final EIS includes this information.

**47.34 COMMENT:** In this WSA BLM has downgraded the scenic quality of the area in order to claim that the Valley of the Gods portion of the WSA should be eliminated from the wilderness proposal. The Valley of the Gods has been given a Class C scenic quality rating and a Class III VRM classification even though the area is advertised nationwide as a scenic attraction. A proper Visual Resource Inventory evaluation would change those ratings to Class A scenic quality and Class II VRM. [Owen Severance]

**47.34 RESPONSE:** Wilderness designation is not necessarily dependent on high scenic quality, although often it is important as a special feature. The wilderness criteria are: size, naturalness, outstanding sol-

itude, and outstanding primitive and unconfined recreation.

**47.35 COMMENT:** Each of the many canyons forming this unit contains long natural drainages containing some of the best preserved, most numerous, and most important archaeological ruins in all of the western United States. While other places have bigger single sites, the collective information on the history of the Indians in this area and in Fish Creek is unequalled. Wilderness protection serves as the best management tool for the ancient history of this area. We have just now begun the collection of this information, and protection of these areas for the future is the highest national goal for this area. [Utah Wilderness Coalition]

**47.35 RESPONSE:** The Anasazi sites in the San Juan region are important. Protection is and will continue to be a vital part of all public land management actions. Various legal mandates and the BLM land use plans require specific protective measures. Such protective requirements exist with or without wilderness designation. See the response to General Comment 20.1.

**47.36 COMMENT:** BLM correctly identifies several wilderness activities as being outstanding in this area. More are outstanding and need to be added to the list. These include hunting and scientific study of archaeology, biotic communities, and wildlife. For wildlife, this area has not seen much hunting but serves as a base to support the feeding and breeding of many game species. Wilderness protection would allow reintroduction of sensitive species which used this area before man interfered. Wilderness designation would preclude activities which would conflict with present grazing uses. Unnecessary mineral exploration and ORV activities are now poised to damage grazing improvements, damage forage and soil, and annoy domestic animals. Wilderness designations offer opportunities to prevent these conflicts. [Utah Wilderness Coalition]

**47.36 RESPONSE:** As noted in the wildlife narrative for this WSA, the area was closed to hunting during the early 1980s due to low populations and is now part of a limited-entry buck-only hunting area. This activity is not outstanding in the WSA. Also noted is the likelihood of reintroduction of bighorn sheep. No mineral or ORV activities now occur in the WSA which adversely affect present grazing uses.



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 47: ROAD CANYON WSA (CONTINUED)

**47.37 COMMENT:** BLM's assessment of opportunities for solitude is not accurate. [Jack Spence and Owen Severance]

a. I disagree with the Draft EIS comments concerning the solitude quality of the southern part of the WSA. I have not noticed any intrusions from the Valley of the Gods road, nor have I detected any lack of solitude in lower Road Canyon. The entire area easily meets the solitude criterion. I also strongly disagree with the Draft EIS conclusions concerning primitive recreation opportunities in Lime Creek. I have found hiking and backpacking in this drainage equal to any WSA in the area. A backpacking trip down Lime Creek, across the plateau near Barton Range Canyon, and up Road Canyon is a demanding trip, with much scrambling and climbing around difficult pour-offs. The statement indicating Lime Creek is only a short segment is false: it requires a full days hiking, particularly if side canyon trips are included. This entire area abounds in primitive recreation activities of all kinds including rock climbing, horseback riding, and nature and geological study. The conclusion that the 29,200 acres near Lime Creek do not provide these activities simply reflects BLM's ignorance of the area. The oil/gas potential for the area is low, and other minerals are essentially absent. There are no other conflicts of consequence and there are no reasons for not recommending the entire area for wilderness. The areas excluded on the southern part in the Proposed Action provide a unique contrast to the plateaus and deep canyons, allowing a large variety of geological and ecological systems to be found in one area. I strongly urge all wilderness recommendation for this WSA.

b. The claim that the Valley of the Gods portion of the WSA lacks solitude is not correct. There is adequate topographic screening to provide solitude in most of this area. The West Fork of Lime Creek is the destination for most hikers in this area. It does provide outstanding opportunities for both solitude and primitive recreation. BLM seems to feel that day hiking is not a legitimate use of a wilderness area; what other reason is there to object to including drainages "of a couple of miles" each? The low speed dirt road through the area does not detract from these opportunities because of the low volume of traffic. The broken terrain means that the road and its impacts are not noticeable a short distance away. The "road" west of Pyramid Peak to the mouth of Lime Creek is rarely used, so it doesn't detract from the solitude. Again, the mouth of Lime Creek has adequate topo-

graphic screening to provide outstanding solitude. My modified all wilderness proposal provides a more manageable boundary in addition to adding additional area that meets wilderness requirements and deleting area that lacks solitude. It should be the preferred alternative.

**47.37 RESPONSE:** BLM has determined that 87 percent of the Road Canyon WSA meets the criteria for solitude, while 13 percent does not. Areas which do not meet the criteria are along the south and east edges of the WSA in locations which have little topographic and vegetative screening, and which are easily viewed from adjacent roads. See the responses to Specific Comments 26.51 and 40.54. Regarding the suggested modified proposal which adds additional area, see the response to General Comment 3.1.

**47.38 COMMENT:** The southern tip of the Road Canyon area and a substantially larger portion of the Grand Gulch complex are used by the United States Air Force as a practice bombing range. I've had occasion to be riding my horse through these areas, the sun goes dark, I look up, and 200 feet up is a bomber. I'm concerned that people who use this may suffer severe psychological damage from the impact of these airplanes. The Air Force is a higher use of this area and this should preclude these areas from being designated as wilderness. [Robert Adams]

**47.38 RESPONSE:** BLM has determined that the overflights are not frequent enough to substantially affect wilderness values in this WSA. See the response to General Comment 22.7.

**47.39 COMMENT:** Road Canyon WSA is considered to have high wilderness-quality values and moderate conflicts. As was the case with the Grand Gulch ISA Complex, a more workable alternative may be to restrict the WSA boundary to the canyon rims and allow the mesa tops to be utilized for other practices such as increased and improved forage production for livestock and wildlife. Due to concerns with cultural resource protection, an administrative designation may be more appropriate for this unit than a wilderness designation. [State of Utah]

**47.39 RESPONSE:** The San Juan RMP will address alternative designations for the Road Canyon area. Wilderness designation by Congress would amend BLM's land use plan to add certain wilderness management criteria, which may be somewhat different than management provisions of the land use plan.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 47: ROAD CANYON WSA (CONTINUED)

Regarding cultural resource protection, see the response to Specific Comment 47.35.

**47.40 COMMENT:** Map 1 needs to be corrected. The State does not own all of T. 40 S., R. 19 E., sec. 16. See Volume I, page 303. [State of Utah]

**47.40 RESPONSE:** The referenced section is not in the WSA. However, a portion of the section is not State-owned. This is corrected on the maps in the Final EIS.

### SECTION 48 FISH CREEK CANYON WSA

**48.1 COMMENT:** In 1864, Navajos were gathered by Kit Carson and taken to Fort Sumner, New Mexico, and were held captive there for 4 years. After 4 years of suffering, those who were held captive conceded to giving up a major portion of their lands. But there were Navajos who remained north of the San Juan River, all the way up to LaSal Mountains. They claimed they did not concede to giving up their land, so this is still Navajo country to them. And the comment I wanted to make is that Navajos and other Indians should not be prohibited nor restrained from entering these areas for these different reasons because of their survival. And it's important to them that they have access to these areas. [Utah Navajo Development Council]

**48.1 RESPONSE:** See the response to Specific Comment 47.1

**48.2 COMMENT:** The Fish Creek Canyon WSA has had a strange history of unexplained deletions of large areas of the original inventory unit. The original size was 94,600 acres and now BLM is proposing only 35,220 acres for wilderness designation. During the initial inventory, BLM found that most intrusions were on the mesas, not in the canyons. Those intrusions that did occur in the canyons either could or already have returned to a natural condition. BLM further stated: "Because of documented intrusions on the mesas but not in the canyons themselves, as well as outstanding wilderness qualities in the canyons, it is recommended that this unit be intensively inventoried with a boundary change to exclude the known intrusions." This boundary change also eliminated over 9,000 acres below the mesa top; even though the intention was to remove only those areas on the mesa

top having intrusions. That improper exclusion eliminated Mule Canyon and the colorful "badlands" to the south from wilderness consideration without cause. As a result, the eastern boundary of the WSA is unmanageable because it follows section lines instead of topographic features. Now BLM's preferred alternative proposes to eliminate 6,000 acres in Dry Wash from the wilderness recommendation in order to remove mesa top intrusions and improve manageability! This elimination of Dry Wash is proposed even though the intensive inventory stated: "Dry Wash with its wide bottom and benched slickrock walls also offers outstanding solitude to users." This solitude, along with the naturalness of the area, means that it should remain as part of the wilderness proposal. The proper (and very manageable) east boundary for the partial wilderness proposal should be as shown on the accompanying map. All of the disputed mesa tops are excluded from the proposal; both Dry Wash Canyon and Mule Canyon along with the "badlands" between them are included. The eastern boundary follows the Cutler Formation where it rises out of the ground along the west side of Comb Wash. All of the flat grassland in the bottom of Comb Wash is left outside of the proposal. This is the wilderness proposal that would have evolved from the wilderness study process if BLM had done the study properly; it should become BLM's Proposed Action. [Owen Severance]

**48.2 RESPONSE:** See the response to General Comment 3.1. See the Alternatives Considered and Eliminated from Detailed Study section of the Final EIS.

**48.3 COMMENT:** In the Fish Creek Canyon WSA which is down in San Juan County, the Proposed Action shows a totally illogical deletion in Section 30. The proposed boundary follows section lines from the mesa top to the canyon floor and back up. This excludes two very short sections of the canyon which are accessible only through the wilderness. [John Veranth]

**48.3 RESPONSE:** The boundary of the Proposed Action in the Draft EIS followed the topographic line and then the edge of a State-owned section. It is section 32 rather than section 30. The Proposed Action has been revised in the Final EIS, with a new and substantially different boundary along the east side. See Map 3 in the Fish Creek section of Volume V.

**48.4 COMMENT:** For Fish Creek Canyon, the proposed boundary in the Partial Wilderness Alternative on the north east of Fish Creek is not very accessible to

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

vehicles and there is no manageability conflict in including this area. The proper way to obtain a manageable boundary would be to move the line east to the edge of the Comb Wash road. [John Veranth]

**48.4 RESPONSE:** The land near the Comb Wash road is outside of the WSA, and BLM determined during the inventory that it does not meet the criteria for wilderness designation. The inventory phase has been completed.

**48.5 COMMENT:** BLM has improperly applied the manageability criterion. [Scott Delong, Dean Petaja, and Jack Spence]

a. Another problem with the Draft EIS concerns manageability, a consideration for wilderness designation. This has been used rather arbitrarily throughout the Draft EIS to recommend areas for elimination from wilderness. A prime example is Fish Creek Canyon (WSA 48) in the Moab District, in which I have backpacked on several occasions. In BLM's Proposed Action, 11,220 acres (of a total of 46,000) of the WSA are recommended for No Wilderness designation, regardless of the facts that all of the area meets the wilderness criteria for naturalness and solitude, 96 percent of the area meets the criterion for primitive recreation, and no significant mineral conflicts exist. The description of the alternatives and their environmental consequences give no clue as to why the preferred alternative is more easily managed, the apparent reason for elimination of the 11,200 acres, than the All Wilderness Alternative. Most likely, BLM does not wish to deal with local ORV use at the mouth of Fish Creek and in Dry Wash; this, however, is hardly a reason for elimination of over 11,000 acres of first class wilderness, in the guise of manageability.

b. This WSA is an integral part of the Grand Gulch/Cedar Mesa region. It is widely known for its recreation and cultural resources. Dry Wash is every bit as important as the rest of the unit. Manageability is a conflict which can be resolved, it alone is not a valid rationale for BLM's partial alternative. The manageability problem could be solved by moving the boundary to the edge of the imprints.

c. Most of the boundary for the Partial Wilderness Alternative would follow the north rim of Fish Creek Canyon and could allow injurious intrusions that could impair the solitude of the entire area. Many areas that were dropped from the initial wilderness

inventory were deleted precisely because of existing intrusions not within the WSA's but adjacent to them.

**48.5 RESPONSE:** The Partial Wilderness Alternative boundary on the North Rim of Fish Creek Canyon has been revised in the Final EIS, and it now borders the north and east sides of Dry Wash. Consequently, BLM's Proposed Action has been increased to 40,160 acres in the Final EIS.

**48.6 COMMENT:** The rationale for BLM's Proposed Action alternative should be provided in the EIS. [Sierra Club, Cache Group and Scott Delong]

a. In short, I see a number of compelling reasons why all of this WSA should be designated wilderness, and no reasons whatsoever for the Bureau's preference for partial designation. Surely this is one area where the lack of conflicts clearly support the All Wilderness Alternative.

b. It is difficult to tell why BLM dropped this area from its proposal. Was it an arbitrary decision?

**48.6 RESPONSE:** The rationale for the Proposed Action and for the 6,280 acres not proposed is summarized in Appendix 11 in Volume I of the Final EIS.

**48.7 COMMENT:** BLM, with no support from the study policy, uses boundary definition as a problem along part of the WSA edge. The fact that the WSA boundary now crosses natural areas instead of following manmade impacts or non-BLM lands shows the violations of the inventory. Further deletions justified by boundaries which were caused by inventory violations clearly doubles the administrative deviation from wilderness review policy. [Utah Wilderness Coalition]

**48.7 RESPONSE:** See the response to General Comment 3.1.

**48.8 COMMENT:** Dry Wash should be included in the Proposed Action. [Damian Fagan, Drew Leemon, Michael Van Note, et al.]

a. It seems that the problem lies on the eastern boundary of Fish Creek, the mesa edge, and the drainage of Dry Wash. There is no explanation as to why Dry Wash is excluded in this review. Perhaps some of the mesa top lands on the eastern edge of Dry Wash could be excluded (if man's imprints are noticeable) yet the canyon bottoms should be included.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 48: FISH CREEK CANYON WSA (CONTINUED)

b. Having read your proposal, I am a bit mystified by the alternative deleting the Dry Wash area from proposed wilderness status. Your document does not describe any overriding resource conflicts, chained areas, roads or ways, or promising oil and gas leases. In fact, the whole area seems to have no values excepting wilderness and livestock grazing. The problem with the Partial Wilderness Alternative is that it pulls the wilderness boundary right to the rim of Fish Creek Canyon for most of its length, which affords inadequate protection for the wilderness resource of this beautiful gorge. The All Wilderness Alternative provides a much better boundary line and, as near as I can determine, introduces no serious resource conflicts. Therefore, I would like to express support for that alternative in place of the Proposed Action alternative.

c. The main reasons for deletion of the Dry Wash area appears to be the Comb Wash Road. It receives minimal traffic in this location. In fact, during two prime spring weekends in this area, I only saw one or two vehicles per day. The fact that Comb Wash must be forded several times, and that the road is at best a dirt road suitable for high clearance vehicles and at worst is impassible during times of rain/high water, will mean that the road has minimal impact upon the wilderness values of Dry Wash. More to the point, the Comb Wash road is not visible from the overwhelming majority of the WSA area and from high rims (where it is lost against the immensity of Comb Ridge). As for the barbed wire fence and corral, these could easily be removed and, in any case, are not visible except at a very close range. As BLM itself states, "the impact of the corral is negligible." The southern boundary road also has a minimal impact upon the deleted area. The screening of the sagebrush and pinion/juniper ensures that the road can only be seen at close range. As is the case with the Comb Wash road, this boundary road receives minimal use (no observed vehicles during two beautiful spring weekends). In fact, during two weekends in this area, no other individuals were observed within the WSA, which certainly would meet the test of "opportunity for solitude." I also object to the rationale with intrusions. The intrusions, such as they exist, consist of ways which could be easily blocked off and reseeded. Most of the intrusions are short and appear to be for the short-term purpose of firewood gathering.

d. BLM's decision to exclude Dry Wash from the "suitable" recommendation is very troubling. Dry Wash's wilderness values have been recognized for a

long time. The Intensive Inventory decision stated, "Dry Wash Canyon with its wide bottom and benched slickrock walls also offers outstanding solitude to users." The Draft EIS admits offsite intrusions and influences are nonexistent in the canyon. Conflicts are nonexistent in Dry Wash, as well as the rest of the WSA. Most of the 11,500 acres excluded are either closed to leasing or leased with no surface occupancy stipulations. The Draft EIS describes the mineral potential of the WSA as being rated from "none to low." Not recommending an area of high wilderness values and low conflict is in direct conflict with the stated objective of BLM's preferred alternative as stated in Volume I.

e. I see no reason to eliminate Dry Wash from the wilderness proposal. The upper portion in particular is quite scenic. Like Road Canyon WSA, this area has numerous archaeological sites which can best be preserved through a continued roadless status best achieved through wilderness designation. Such designation would also protect the diverse wildlife, including a number of fish species. The scenic wonders such as large arches, sandstone spires, and deep canyons are just another example of the outstanding diversity of wilderness character to be found in this WSA, and one more reason for all wilderness designation.

f. There is no reason why the upper Dry Wash Canyon area of the original Fish Creek Canyon WSA should not be designated as wilderness. The road described under "Affected Environment," "Wilderness Values," was created by vehicle passage and not excavation and will return to a natural state with discontinued use. Upper Dry Wash Canyon provides excellent opportunities for solitude and dispersed recreation.

**48.8 RESPONSE:** See the responses to Specific Comments 48.3, 48.4, and 48.5. Upper Dry Wash now is included in BLM's Proposed Action. Traffic on the Comb Wash Road is not a significant factor in the rationale for the Proposed Action.

**48.9 COMMENT:** Major management difficulties with the Dry Wash section of the WSA were alluded to in the Draft EIS, but not specified. These should have been spelled out in detail in the document, so individuals could appreciate those types of obstacles to wilderness recommendation from the perspective of BLM. [Roger Jenkins]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

**48.9 RESPONSE:** There would be no major wilderness management difficulties in the Dry Wash portion of the WSA. In the southeast corner of the WSA, near the mouth of Dry Wash, the existing county road and relatively open terrain reduce the opportunities for outstanding solitude.

**48.10 COMMENT:** BLM's final proposal should include: (1) Owl Creek Canyon, (2) Mule Canyon (lower portion), (3) McCloyd Canyon, and (4) Dry Wash Canyon. We are especially concerned about Dry Wash Canyon. BLM claims that if this area was designated as wilderness, it could not be managed properly. This area does possess many unique and outstanding wilderness qualities that deserve protection. BLM should expand the WSA boundaries beyond Dry Wash to completely preserve this very natural and scenic land. [Sierra Club, Cache Group]

**48.10 RESPONSE:** Owl Creek Canyon, McCloyd Canyon, and most of Dry Wash Canyon are within the WSA and are included in BLM's Proposed Action. The lower portion of Mule Canyon is outside the WSA and is no longer part of the wilderness review. See the responses to Specific Comments 48.3 and 48.8.

**48.11 COMMENT:** BLM failed to report on interim management actions that they have allowed within the WSA. With rare exception, these interim management actions coincide with areas now being dropped by BLM from their wilderness recommendation. The deletion of the mesa top between Fish Creek and Dry Wash removes vehicle way construction conducted after 1976 allowed by BLM for a grazing operator. In this same area BLM allowed several seismic exploration activities. The correlation of allowed actions within wilderness study areas and deletions from recommendations is strongest north of the mouth of Fish Creek. BLM has allowed four oil and gas exploration actions in this area (one occurred before 1976). BLM designated 30-year rights-of-way to these drill locations. This same area where drilling has occurred is recorded by BLM as endangered bald eagle habitat. The deletions BLM makes from the WSA contain human impacts that BLM has allowed to be constructed since the passage of FLPMA. [Utah Wilderness Coalition]

**48.11 RESPONSE:** See the response to General Comment 5.1.

**48.12 COMMENT:** The presence of State lands inside the recommended area is not a serious manage-

ment problem. The State has initiated a widely supported effort to exchange State lands. Those proposed to be exchanged include the State lands within this wilderness study area. [Utah Wilderness Coalition]

**48.12 RESPONSE:** See the response to Specific Comment 47.16. State sections are not expected to be a management problem in Fish Creek Canyon WSA.

**48.13 COMMENT:** The State land at T. 39 S., 20 E., sec. 2, should be included, as should T. 38 S., R. 20 E., secs. 35 and 26. Although seemingly close to the Comb Wash Road, the country is broken enough to provide a feeling of seclusion and solitude. The proposed alternative is especially irrational for its failure to include this land and means that a prime section of Fish Creek is not included within the proposed WSA. While there is no breakdown of VRM found at page 17, it can be assumed that Dry Wash is to be classified as the higher-numbered category. The view from the Comb Wash Ruin of much of the lower reaches of the Dry Wash area is superb, not only for its panoramic view of the country from Lone Cone to Monument Valley, but also the foreground badlands within the Dry Wash area. These badlands are highlighted by multicolored bands (reds, whites, and blues) which deserve protection. Certainly the view from the Comb Wash Ruin is priceless and unique, and accordingly the Dry Wash area should not be considered to have low visual sensitivity. Further, some of the Dry Wash area is visible from both the lower end of Fish and Owl Creeks and from the highway where it breaks through Comb Ridge. [Henry Wright]

**48.13 RESPONSE:** The three sections cited are outside of the WSA. Also, see the response to Specific Comment 48.4.

**48.14 COMMENT:** The Complex concept should be applied to the Road, Fish Creek, and Mule Canyon WSAs as well. There exists in this area an excellent opportunity to create a contiguous wilderness area extending from Highway 95 south to Valley of the Gods. [Drew Leemon]

**48.14 RESPONSE:** See the response to Specific Comment 47.10.

**48.15 COMMENT:** Access to this area, even foot traffic through Grand Gulch, is having a significant impact. We suggest that BLM consider controlling access to this area to minimize these impacts. [Wasatch Mountain Club]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

**48.15 RESPONSE:** See the response to Specific Comment 47.12.

**48.16 COMMENT:** The entire area has a low potential for oil and gas, and no potential for any other minerals. BLM's own rangers have recommended that this area be designated as wilderness because of its unique backcountry character. What is the basis for deletion of a portion of this WSA? [Sierra Club, Cache Group]

**48.16 RESPONSE:** See Appendix 11 in Volume I.

**48.17 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvanian age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**48.17 RESPONSE:** See the response to Specific Comment 39.16.

**48.18 COMMENT:** Most of the oil and gas production in Utah is from the Paradox, Uintah, and Green River basins and from the thrust belt. In 1984, there were 34,689,000 barrels of oil produced in Utah. None of this production came from WSAs. BLM estimates that 12 percent of Utah's proven and indicated reserves lie within WSAs. This is less than 0.4 of 1 percent of the U.S. proven and indicated reserves, which is an insignificant amount, and I believe is an overestimate. BLM's wilderness study area contains 2.7 percent of the estimated natural gas reserves. However, quoting from the EIS, quote: "This is an overestimation because of the amount of natural gas estimated in wilderness study areas represents hypothetical and speculative amounts." The overestimation of oil and gas potential is shown even more clearly in specific wilderness study areas. For example, the Road Canyon WSA, BLM estimates an oil potential of less than 10 billion barrels of which 3 million might be recoverable. The adjacent Fish Creek Canyon WSA is estimated to contain the same amount of oil potential. However, if a map of wells drilled in the vicinity of these WSAs is compiled, you will soon see

that all of them are dry holes. The entire area has been perforated with wells. There have been wells drilled in every single unit. There have been 88 wells which have been drilled within 6 miles of the WSAs and only nine of these wells produced something. They have all since been capped and abandoned. BLM in the EIS for both of these WSAs indicates that the likelihood of recovery is low and the loss of development opportunity would not be significant if the areas were designated wilderness. I believe that BLM is correct in this assessment. However, it is ridiculous to assume there is any potential where there are 79 completely dry holes perforating the area. The 20 million barrels of oil potential and the 6 million barrels of estimated recoverable oil should be subtracted from total estimates. This is a significant point, for if it is true for other WSAs, then the oil and gas potential for the Utah BLM WSAs has been grossly overestimated. [David Susong]

**48.18 RESPONSE:** See the response to Specific Comment 47.19.

**48.19 COMMENT:** The 13 miles of ways that would remain open seem to be a major reason BLM prefers this alternative. Backpackers have learned to live with closures, etc., because they are important to resource protection. ORV users must accept this too, and BLM must enforce tough decisions, not circumvent them. [Bruce Pendery]

**48.19 RESPONSE:** With BLM's Proposed Action in the Final EIS, 6 miles of ways would be outside of the designated wilderness and would remain open, while 13.8 miles would be closed.

**48.20 COMMENT:** The impact of perimeter roads is often overstated in the Draft EIS. The analysis of many of the WSAs overestimates the impact from perimeter roads and, as a result, incorrectly concludes that certain large areas are not suitable for wilderness designation. The proposed Partial Wilderness Alternative in the Fish Creek Canyon WSA, which deletes the northeast portion, is another area where the impact of a perimeter road is overstated. [John Veranth]

**48.20 RESPONSE:** See the response to Specific Comment 47.14.

**48.21 COMMENT:** BLM states "PNV is an important object of research because it reveals the biological potential of a site." Comparing Tables 4 and 5, and if

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

desert shrub is the same as blackbrush vegetation, it would seem this area is not too far from having its PNV. An interest of mine is grass identification. On my trip there in April I saw the following genera of grasses: wheatgrasses (formerly Agropyron), bluegrasses (Poa), ricegrass (Oryzopsis), needlegrass (Stipa), grama grass (Bouteloua), (Phragmites), reed canafygrass (Phalaris), (Hilaria), three-awn (Aristida), bluestem (Andropogon), brome (Bromus), muhly (Muhlenbergia). Wildrye (formerly Elymus), (Puccinellia), and sand dropseed (Sporobolus). This list is being reconstructed 4 months after the fact, and I am sure I saw others. The point is, throughout the EIS (all volumes) BLM fails to give readers an appreciation for the tremendous diversity in these WSAs. [Bruce Pendery]

**48.21 RESPONSE:** The EIS identifies the vegetation types. It is not intended to be an encyclopedic compilation of all plant species in each WSA. The intent of the EIS is to analyze the major issues and impacts from the various alternatives. See the response to General Comment 9.6.

**48.22 COMMENT:** BLM correctly interprets that pre-FLPMA and post-FLPMA leases within designated wilderness area do not pose management problems. The Wilderness Management Policy supported by recent court decisions and the Wilderness Act, clearly give BLM the authority to prevent actions within these leases that degrade wilderness values. [Utah Wilderness Coalition]

**48.22 RESPONSE:** Pre-FLMA leases held by production do have pre-existing rights which may degrade wilderness values.

**48.23 COMMENT:** While the DOE Energy and Mineral Evaluation rates the importance of oil and gas f2/c2, it appears that recent dry holes may not have been considered in this evaluation. Exploration, driven more by distant exploration to the east, has proven with greater certainty that commercial petroleum resources are extremely unlikely in this area. Consideration of recent seismic work and exploration may make a rating of f1/c3 more accurate for oil and gas potential. All existing evidence reinforces BLM's conclusion that other minerals are unlikely to occur in significant quantities. They are all rated f1, the lowest rating. No other feasible development prospect which cannot be accommodated outside these areas being studied for wilderness offers any conflict. [Utah Wilderness Coalition]

**48.23 RESPONSE:** Minerals information has been reviewed and updated where new data exists. The only potential for this WSA is oil and gas. The rating used in the Draft EIS has not been changed for the Final EIS.

**48.24 COMMENT:** BLM limits wilderness activities in their assessment of the wilderness values in this area. Hunting, supported by a critical winter habitat found in this area, is of outstanding importance. More money is made with hunting in Utah than with the grazing industry. It is one of Utah's bigger businesses. Wilderness designation will protect this habitat from conflicting ORVs, new road construction from exploration, and other developments. [Utah Wilderness Coalition]

**48.24 RESPONSE:** Hunting is not a major activity in this WSA. As noted in the EIS, the deer herd unit was closed to hunting during the early 1980s due to low populations. The WSA is now part of a limited buck-only hunt area where only 440 permits were issued in 1988. No critical habitats have been identified within the WSA. The vegetation treatment proposed for livestock in the No Action/No Wilderness Alternative would increase forage and ecotone (edge effect) habitat for wildlife.

**48.25 COMMENT:** The proposed seedings would be harmful rather than beneficial to wildlife. [Scott Mills and Bruce Pendery]

a. The proposed seeding in sections 2, 3, 11, and 12 is gigantic and would be harmful to wildlife. These sections are contiguous and would contain 2,560 acres. The proposed seeding is 2100 acres, which means between 3 and 4 square miles would be seeded. In Wildlife Habitats in Managed Rangelands--The Great Basin of Southeastern Oregon, Mule Deer (USDA GTR-PNW139), Leckenby et al., stated that "forage areas wider than 820 feet create less than optimum conditions" for mule deer use. This is only an example, and exact impacts will depend on the specific size, shape, success, and components of the seeding; but in general, seedings of this size are harmful to wildlife. This proposal should be reevaluated. The contention that the seeding would only have temporary impacts on wildlife is probably wrong. Diversity and edge have a general correlation, but it is assumed to be universally true by land management agencies, which is potentially unbeneficial for wildlife.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 48: FISH CREEK CANYON WSA (CONTINUED)

b. The Draft EIS states that "in the long term, wildlife would benefit from increased diversity." This could be true for some species, but it is certainly not true for all wildlife. Since they can be very misleading, statements referring to benefits of diversity should be firmly supported by recent scientific literature.

**48.25 RESPONSE:** The vegetation treatment would be irregular in shape, with both wide and narrow areas. Based on conditions with similar treatments in the region, it is expected that deer would benefit (but not necessarily with optimum conditions at all locations). There are other animal species that would be helped by the treatment. Examples are rabbits, woodrats, doves, ground squirrels, and various lizards. These species respond favorably to low successional stages which would be created. Also, see the response to General Comment 16.7.

**48.26 COMMENT:** The impact on Navajo wood supplies should be analyzed. [Utah Navajo Development Council and David Adams, State Representative]

a. Cedar Mesa and Grand Gulch are a major resource of wood for the Navajo Indians living on the Navajo Reservation in the southern end of the county. And if this is designated as a wilderness, they would no longer be able to gather wood from these areas. Now, I know there are areas on the mesa that are not designated; the areas that I know of are Grand Gulch, the Cigarette Springs area, and Cigarette Springs Mesa, which is designated in that area as the proposed wilderness. This is a major area of wood gathering activities for the Navajo Indian tribe. Now, that might not seem too significant to some of us, but that is their major source for heating and cooking. And it would be a definite impact on the Navajo tribe should this area be off limits to their gathering of their energy source.

b. Now, Navajos collect firewood from these areas to heat their homes, to cook their meals. This is a necessity because there is no electricity in the majority of the Navajo homes. The firewood is used in large quantities for traditional things. These include healing rights held by Navajos. These are used in traditional things: in Squaw dances, which is another official term used--enemy way thing; in fire dances, this is a 9-night thing; and also Yei-Bi-Chai dances, which also lasts 9 nights. And what is used also to cook meals for people who help in these activities, to cook meals for those who participate in the

rituals, in the dances, and those who come there to watch. It is also used to provide firelight at night when the dances are held. Many of these squaw dances are held in different locations during the summer, depending on the number of people who are affected by the enemy spirits. The Navajos use live juniper--they cut these trees--to build hogans, which is the traditional dwelling place for Navajos, plus it is also used for a stove, and these ceremonials are held. They're used to build shade huts where meals are cooked and also to build livestock corrals. Now, the Navajos also use cedar branches and juniper branches for building shade houses where meals are cooked during meal times. And also they're used to enclose dancing areas for the fire dance and the Yei-Bi-Chai dances. And the Navajos use live juniper leaves. They use these--they burn the leaves and mix it with corn meal--or ground corn, to make cornmeal spread and other traditional foods. Many of these are used during the ceremonials. Navajos also pick pinyon nuts in these areas when they are available.

c. Cedar Mesa, Fish Creek and Mule Canyon have very important wood gathering areas for the Navajo people. Now this is maybe no consequence to you, because maybe you don't know what wood gathering is to the Navajo people. Sixty percent of these people have no running water. They have no electricity. They have no other way of heating their homes other than by wood. I work with the Navajo people and I know what economic problems they have. Without wood, they're going to go cold and they are not economically able to go, elsewhere besides these areas to gather their wood. Its going to be a tremendous impact upon them. In fact, I doubt you will be able to stop them from gathering wood there anyway.

**48.26 RESPONSE:** See the response to Specific Comment 47.27.

**48.27 COMMENT:** Now, we say that before the white man came, Indians depended very much on nature and its resources for survival. The land to the Navajo is mother earth. It provides the necessities of life: air, water, food, medicine, shelter, energy. Now, in return for these resources, Navajos present precious stones and corn pollen to the earth and bless the earth. They ask God for blessings on the mountains, valleys, plants, wild and domestic animals from the Holy Spirit Creator. Through this respect, reverence, and exchange of gifts, Mother Earth has provided resources abundantly to the Navajos. Navajos collect herbs from these areas for traditional



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

healing, curative, and help maintenance purposes. They use these in traditional ceremonials, also. Ceremonials include a variety of sings: like fire dances, Squaw dances, Yei-Bi-Chai dances, and other rituals for healing the sick. Examples: ground broadleaf Yucca is a remedy for vomiting, relieve heart burn, is used in the mountain chant. Big sagebrush is used to help in deliverance of children, for stomach aches, for head-aches, for colds and fevers, as an ingredient in the life medicine used in the mountain chant. Ephedra is a remedy for venereal, kidney, and stomach problems, and as cough medicine. Some euphorbia plants are used as remedy for boils and pimples. Cliff Rose is used with sagebrush and other plants for colds and fever. It is used to soothe and medicate back pains and muscle aches. Many other plants are used for different purposes, in combinations or in mixtures. Different parts of plants are used. In some plants, only the roots are used, some are the leaves, and some the whole plant. [Utah Navajo Development Council]

**48.27 RESPONSE:** See the response to Specific Comment 47.28.

**48.28 COMMENT:** BLM's reseeding projects are inappropriate for the Fish Creek Canyon WSA. [Sierra Club, Cache Group, and Thea Nordling]

a. BLM's extensive and expensive plans for re-seeding for cattle should be directed to less sensitive areas.

b. I am concerned about BLM's partial wilderness proposal for Fish Creek Canyon. Livestock improvements on lands dropped from the wilderness inventory are inappropriate to such a sensitive area and undermine the canyon system's outstanding primitive character.

**48.28 RESPONSE:** Potential vegetation treatment areas are identified on the basis of climate, terrain, soils, and other conditions which would be needed. The potential areas are used in the wilderness EIS analysis. All potential treatment areas would be further evaluated prior to implementation, and generally those in the less sensitive areas would be given priority. Controlled burns are the proposed method of treatment and there would be minimal soil disturbance.

**48.29 COMMENT:** There is some reference to barb-wire fences on the eastern or southeastern portion of

the WSA and the negative impact which these fences make on the apparent naturalness of the setting. Frankly, from any perspective as a wilderness user, the fences do not represent a significant visual impact. They would make an even smaller impact if BLM removed them. An obviously removable imprint of man should be no barrier to wilderness designation. [Roger Jenkins]

**48.29 RESPONSE:** The fences are included on the list of existing intrusions but they are not a factor in the determination of BLM Proposed Action.

**48.30 COMMENT:** The inclusion of the lower portion of Mule Canyon is important to protect scenic highway vistas along Utah 95. [Sierra Club, Cache Group]

**48.30 RESPONSE:** See the response to Specific Comment 48.10.

**48.31 COMMENT:** Wilderness designation would protect important cultural resources. [Sierra Club, Cache Group; Utah Wilderness Coalition, et al.]

a. This canyon area contains important Anasazi ruins which should be protected through wilderness designation.

b. The Dry Wash area has unique archaeological resources, such as a fortress which reminds one of Hovenweep, several large pithouses/kiva sites, numerous cliff dwellings, tower sites at the head of canyons, and numerous lithic and pottery scatters. The Dry Wash area also has unique natural values. The lower part of the canyon is broad and expansive, in contrast to the narrower canyons elsewhere on Cedar Mesa. Further, the canyon has not been cut up with arroyos and gullies as have so many other canyons. Also, there are several very large, sheltered pools in the upper canyon.

c. Both the mesa tops on either side and Mule Canyon contain one of the highest densities of archaeological sites in the United States. The Cedar Mesa area, which includes all of the Fish Creek and the Mule Canyon areas, was the core for ancient Indian agriculture. The sites range from almost perfect kivas and buildings to numerous burial and chipping sites. BLM has avoided inventorying and reporting these resources to avoid reporting conflicts with programs that are destroying these resources. Even now, BLM still allows in their present plans the running of

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

bulldozers linked with ship chains over these ruins on the mesa tops.

**48.31 RESPONSE:** See the response to Specific Comment 47.35.

**48.32 COMMENT:** Fish Creek Canyon WSA has high wilderness quality values and moderate conflicts compared to other WSAs in the region. The conflicts are primarily potential land treatments for livestock and wildlife. Limiting the boundaries of the WSA to the mesa tops is suggested to eliminate these conflicts. There remains a potential conflict with development of underground water. In order to facilitate special management of cultural values, an administrative designation may be preferable to a wilderness designation. [State of Utah]

**48.32 RESPONSE:** See the response to Specific Comment 47.39. Fish Creek Canyon WSA would be in the same situation as the Road Canyon WSA. Development of underground water sources are not proposed in either WSA.

**48.33 COMMENT:** Another problem is the loss of the State section near the junction of Fish Creek and Owl Creek. This would effectively cut the wilderness area in two for anyone on foot. [Scott Delong]

**48.33 RESPONSE:** While Fish Creek flows across the State section, no developments are expected which would adversely affect wilderness recreation use.

**48.34 COMMENT:** The assumptions made in the SSA, "If an area is designated wilderness, BLM will be given sufficient funding and personnel to effectively manage the area" means if boundary markers are necessary, they can be installed. This also means that ORV management will be available if necessary to protect wilderness values. BLM and other agencies have been successful in stopping ORVs. Public information, posting, vehicle barriers, reclamation, and enforcement has worked in similar areas. BLM inadequately evaluates all options of enforcement of off-road vehicles. ORV management here is not an argument consistent with the study policy that allows dropping an area from wilderness designation. [Utah Wilderness Coalition]

**48.34 RESPONSE:** The sentence quoted in the comment is not included in either the Draft or Final EIS. The EIS supersedes a preliminary draft analyses that

was prepared for each WSA. At that time ORV use was interpreted as a manageability problem in certain readily accessible locations; however, it now is viewed as an administrative problem which can be managed. ORV management is not a factor in the determination of BLM's Proposed Action for the Fish Creek Canyon WSA.

**48.35 COMMENT:** BLM incorrectly sees wilderness only for recreation. Protection of scientific values (archaeological and biological) need greater emphasis. Providing a genetic pool for future agriculture is also an asset not now recognized. Another plus with wilderness designation is protection of grazing habitat for wildlife and domestic animals. Many of the nonwilderness activities will significantly impact the water and forage of domestic animals. [Utah Wilderness Coalition]

**48.35 RESPONSE:** The EIS indicates that scientific value is one of the purposes of wilderness. See Chapter 1 in Volume I and the individual narratives on special features. For Fish Creek Canyon, the EIS states that the archaeological resources have scientific values.

**48.36 COMMENT:** BLM also states "Fish, Owl, and McCloyd Canyons are very popular backpacking and day hiking areas." Dry Wash is also more popular than BLM indicates; I visited it when I hiked the area in April. The "way" to the Fish Creek overlook is not particularly noticeable, and could, and should, be closed if BLM enforced it. With regard to wilderness values, the EIS makes a strong case for the All Wilderness Alternative. The ways, even in the areas eliminated in the Partial Wilderness Alternative, are unnoticeable and do not detract from wilderness qualities. Road sounds from U-95 are not near the problem the EIS claims, and in any event, there are many existing designated wilderness areas with similar conditions. We simply don't have 1840's-style wilderness available today. [Bruce Pendery]

**48.36 RESPONSE:** See the responses to Specific Comments 48.4 and 48.8. With BLM's Proposed Action, the ways in the designated wilderness would be closed, except as certain livestock or mining access may be required. Border roads and cherry-stemmed roads would remain open to vehicles.

**48.37 COMMENT:** The 50 to 75 visitor days per year of ORV use is insignificant compared to the current use (4,115-6,131), and projected use (up to

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

9,288) by people desiring primitive recreation. Closure of the 19.8 miles of ways can hardly be thought to constitute a major impact on ORV users. [Bruce Pendery]

**48.37 RESPONSE:** The EIS data indicates that ORV recreation use is low.

**48.38 COMMENT:** This has been a popular backpacking area for years because of the qualities within the eastern areas. [Sierra Club, Cache Group]

**48.38 RESPONSE:** The popular canyons are Fish Creek, Owl Creek, and McCloyd.

**48.39 COMMENT:** BLM's assessment of opportunities for solitude is not accurate. [Sierra Club, Cache Group, and Utah Wilderness Coalition]

a. BLM's final proposal should include all canyon bottoms and mesas to the east. These areas are just as scenic and natural as on the west side. Outstanding opportunities for solitude and primitive recreation are abundant in the eastern area.

b. In Utah BLM deviates from the agency policy in assessing the opportunity for solitude. The IBLA recently verified that the outstanding opportunities for solitude should not be limited to areas with dense vegetation or canyon walls. Even using the limited Utah BLM criteria for solitude, all agree that each of the many canyons with the dense pinyon-juniper forest has excellent opportunities for solitude. Additional areas with scenic vistas and large open natural areas also contain outstanding opportunities for solitude. Here in this area, the cliff rims hold many vistas of more than a hundred miles. The Chapter agrees with BLM that wilderness solitude can be found within this area and finds that additional factors prove the solitude more important than BLM concluded. The easternmost portion of the unit is deleted solely on the basis of "less than outstanding solitude." BLM concluded this area lacked screening and the sight of vehicles on the boundary road would "affect a user's sense of solitude." Dropping this natural area for this reason violates the Wilderness Inventory Policy. No management problem or conflict is used to justify this deletion.

**48.39 RESPONSE:** The EIS indicates that over 96 percent of the WSA has outstanding opportunities for solitude. See the responses to Specific Comments 48.4 and 48.8.

**48.40 COMMENT:** The topography of the area is very unique and is outstanding even when compared against other parts of southern Utah. Naturalness is abundant. [Sierra Club, Cache Group]

**48.40 RESPONSE:** The topography of Fish and Owl Canyons is very interesting and scenic, but it is not particularly unique from other canyons in the Cedar Mesa and Escalante regions. The EIS states that all of the WSA is natural.

**48.41 COMMENT:** Under the Partial Wilderness Alternative BLM states this alternative protects the "best" wilderness. BLM is wrong. The area that would be left out is prime wilderness, it probably receives less use than Fish or Owl Canyons. [Bruce Pendery]

**48.41 RESPONSE:** The partial alternative focuses on the major canyon system which is the most notable attraction because of scenic, archaeological, and other special features. These special features, together with the naturalness, solitude, and primitive recreation opportunities, support BLM's judgment that the Partial Wilderness Alternative has "the most outstanding wilderness characteristics" as cited in the EIS. The canyon areas of Dry Wash are now in BLM's proposed Partial Wilderness Alternative.

**48.42 COMMENT:** Commercial benefits will be protected by wilderness designation. BLM indicates that \$45,000 of sales are now accounted for. Future permanent jobs locally will be available for outfitters for horseback, hiking, and hunting trips. These people will use businesses in Monticello, Blanding, and other towns within the country to reach this area. Most of these people are coming from Colorado now. This low impact recreation income is recurring unlike mining activities. [Utah Wilderness Coalition]

**48.42 RESPONSE:** The EIS analysis indicates that income from recreation use of the WSA by the year 2020 would be between \$52,000 to \$241,000 annually for the All Wilderness Alternative, compared to between \$53,000 to \$244,800 annually for the No Action/No Wilderness Alternative. The difference of \$3,800 or less would not be significant to the local economy.

**48.43 COMMENT:** It is stated that "mining directly accounts for half of the income and over 32 percent of the unemployment in the county." This is meaningless relative to the WSA since minerals are essentially nonexistent in this area. [Bruce Pendery]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 48: FISH CREEK CANYON WSA (CONTINUED)**

**48.43 RESPONSE:** The sentence provides useful background information, consistent with the findings reported in the EIS.

**48.44 COMMENT:** The parenthetical statement "(although the likelihood is thought to be very low)" should be eliminated because it is imprecise and biased. [Bruce Pendery]

**48.44 RESPONSE:** The phrase correctly addresses the probability of mineral occurrence.

**48.45 COMMENT:** The last sentence on page 30 has too many qualifiers regarding use by permittees. If there is a significant impact, state it. [Bruce Pendery]

**48.45 RESPONSE:** The sentence in question has been reworded.

**SECTION 49**  
**MULE CANYON WSA**

**49.1 COMMENT:** In 1864, Navajos were gathered by Kit Carson and taken to Fort Sumner, New Mexico, and were held captive there for 4 years. After 4 years of suffering, those who were held captive conceded to giving up a major portion of their lands. But there were Navajos who remained north of the San Juan River, all the way up to LaSal Mountains. They claimed they did not concede to giving up their land, so this is still Navajo country to them. And the comment I wanted to make is that Navajos and other Indians should not be prohibited nor restrained from entering these areas for these different reasons because of their survival. And it's important to them that they have access to these areas. [Utah Navajo Development Council]

**49.1 RESPONSE:** See the response to Specific Comment 47.1.

**49.2 COMMENT:** We request that BLM with the Forest Service consider all three of these abutting areas (Mule Canyon, Arch Canyon, and National Forest Roadless Area) in one wilderness study. These areas have been fragmented, diminishing their cumulative wilderness values. We request BLM give a history of the vehicle way separating Arch Canyon from Mule Canyon, including the date of construction, the record of main-

tenance, and description of use. [Utah Wilderness Coalition]

**49.2 RESPONSE:** The National Forest area was not included by Congress when Utah's National Forest wilderness was designated in the 1984; and it is not under wilderness study. Arch Canyon is outside of the WSA and is no longer subject to BLM wilderness study, as the inventory process is completed. The vehicle route separating Arch Canyon from Mule Canyon is a bladed road which was in existence prior to the Federal Land Policy and Management Act of 1976.

**49.3 COMMENT:** BLM should study for potential wilderness designation the natural part of the unit up to highway 95 and the Comb Wash Road. The Comb Wash Overlook Road between Dry Wash and Mule Canyon which is a documented maintained road needs to be cherry-stemmed from the study area. Evidence from field work and from BLM record proves that the wilderness inventory incorrectly assessed the naturalness of this area and deleted large areas which are still natural. [Utah Wilderness Coalition]

**49.3 RESPONSE:** See the response to General Comment 3.1.

**49.4 COMMENT:** Access to this area, even foot traffic through Grand Gulch, is having a significant impact. We suggest that BLM consider controlling access to this area to minimize these impacts. [Wasatch Mountain Club]

**49.4 RESPONSE:** See the response to Specific Comment 47.12.

**49.5 COMMENT:** The Complex concept should be applied to the Road, Fish Creek, and Mule Canyon WSAs as well. There exists in this area an excellent opportunity to create a contiguous wilderness area extending from Highway 95 south to Valley of the Gods. [Drew Leemon]

**49.5 RESPONSE:** See the response to Specific Comment 47.10.

**49.6 COMMENT:** On Table 1: The oil and gas recovery figures of 3 million barrels of oil and 18 billion cubic feet of natural gas appear with monotonous regularity. It points to a basic problem with the whole favorability/certainty rating system: Grand Gulch Complex (105,520 acres) and Mule Canyon WSA (5,990 acres) both have f2/c2 oil and gas ratings (indicating

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 49: MULE CANYON WSA (CONTINUED)**

an upper limit of 10 million barrels of oil and 60 billion cubic feet of natural gas); additionally, their geological setting descriptions are similar. However, because of the size difference, an acre of Mule Canyon would have to be about 18 times as favorable as an acre of Grand Gulch. Undoubtedly, it is desirable to quantify mineral resources, and the f/c ratings employ broad categories, but sometimes these numbers seem more misleading than useful. [State of Utah]

**49.6 RESPONSE:** There are difficulties in applying a rating system in order to quantify mineral commodities in the absence of complete field exploration. The favorability/certainty rating system delineates a range of probable occurrences. Mule Canyon and Grand Gulch may have the same favorability per acre and (despite size differences) may still be in the same rating category because the range is wide and the system is general. Also, see the response to General Comment 15.6.

**49.7 COMMENT:** On Table 6: "60 million cubic feet" should read 60 billion cubic feet. [State of Utah]

**49.7 RESPONSE:** The correction has been made for the Final EIS.

**49.8 COMMENT:** In the section on Geology: The term Permian period is preferable to Permian age. [State of Utah]

**49.8 RESPONSE:** Either term is correct. No change has been made in the EIS.

**49.9 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS's pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**49.9 RESPONSE:** See the response to Specific Comment 39.16.

**49.10 COMMENT:** The impacts of the No Action alternative are oriented to game animals. Other species should be included. [Scott Mills]

**49.10 RESPONSE:** See the response to Specific Comment 47.23.

**49.11 COMMENT:** This WSA forms an important component in supporting one of Utah's most outstanding hunting areas. Mule Canyon is correctly identified by BLM as providing a transition zone for deer migration during the fall and spring. The BLM underrated the importance of this area in providing for outstanding opportunity for hunting in other areas and possibly in this WSA. [Utah Wilderness Coalition]

**49.11 RESPONSE:** Hunting in the Mule Creek WSA is not a major activity. The area has been closed to hunting in past years due to the low deer populations. It is presently part of a limited entry, buck-only hunting area.

**49.12 COMMENT:**The impact on Navajo wood supplies should be analyzed. [Utah Navajo Development Council and David Adams, State Representative]

a. Cedar Mesa and Grand Gulch are a major resource of wood for the Navajo Indians living on the Navajo Reservation in the southern end of the county. And if this is designated as a wilderness, they would no longer be able to gather wood from these areas. Now, I know there are areas on the mesa that are not designated; the areas that I know of are Grand Gulch, the Cigarette Springs area, and Cigarette Springs Mesa, which is designated in that area as the proposed wilderness. This is a major area of wood gathering activities for the Navajo Indian tribe. Now, that might not seem too significant to some of us, but that is their major source for heating and cooking. And it would be a definite impact on the Navajo tribe should this area be off limits to their gathering of their energy source.

b. Now, Navajos collect firewood from these areas to heat their homes, to cook their meals. This is a necessity because there is no electricity in the majority of the Navajo homes. The firewood is used in large quantities for traditional things. These include healing rights held by Navajos. These are used in traditional things: in Squaw dances, which is another official term used--enemy way thing; in fire dances, this is a 9-night thing; and also Yei-Bi-Chai

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 49: MULE CANYON WSA (CONTINUED)**

dances, which also lasts 9 nights. And what is used also to cook meals for people who help in these activities, to cook meals for those who participate in the rituals, in the dances, and those who come there to watch. It is also used to provide firelight at night when the dances are held. Many of these squaw dances are held in different locations during the summer, depending on the number of people who are affected by the enemy spirits. The Navajos use live juniper--they cut these trees--to build hogans, which is the traditional dwelling place for Navajos, plus it is also used for a stove, and these ceremonials are held. They're used to build shade huts where meals are cooked and also to build livestock corrals. Now, the Navajos also use cedar branches and juniper branches for building shade houses where meals are cooked during meal times. And also they're used to enclose dancing areas for the fire dance and the Yei-Bi-Chai dances. And the Navajos use live juniper leaves. They use these--they burn the leaves and mix it with corn meal--or ground corn, to make cornmeal spread and other traditional foods. Many of these are used during the ceremonials. Navajos also pick pinyon nuts in these areas when they are available.

c. Cedar Mesa, Fish Creek and Mule Canyon have very important wood gathering areas for the Navajo people. Now this is maybe no consequence to you, because maybe you don't know what wood gathering is to the Navajo people. Sixty percent of these people have no running water. They have no electricity. They have no other way of heating their homes other than by wood. I work with the Navajo people and I know what economic problems they have. Without wood, they're going to go cold and they are not economically able to go, elsewhere besides these areas to gather their wood. Its going to be a tremendous impact upon them. In fact, I doubt you will be able to stop them from gathering wood there anyway.

**49.12 RESPONSE:** See the response to Specific Comment 47.27.

**49.13 COMMENT:** Now, we say that before the white man came, Indians depended very much on nature and its resources for survival. The land to the Navajo is mother earth. It provides the necessities of life: air, water, food, medicine, shelter, energy. Now, in return for these resources, Navajos present precious stones and corn pollen to the earth and bless the earth. They ask God for blessings on the mountains, valleys, plants, wild and domestic animals from the Holy Spirit Creator. Through this respect,

reverence, and exchange of gifts, Mother Earth has provided resources abundantly to the Navajos. Navajos collect herbs from these areas for traditional healing, curative, and help maintenance purposes. They use these in traditional ceremonials, also. Ceremonials include a variety of sings: like fire dances, Squaw dances, Yei-Bi-Chai dances, and other rituals for healing the sick. Examples: ground broad-leaf Yucca is a remedy for vomiting, relieve heart burn, is used in the mountain chant. Big sagebrush is used to help in deliverance of children, for stomach aches, for headaches, for colds and fevers, as an ingredient in the life medicine used in the mountain chant. Ephedra is a remedy for venereal, kidney, and stomach problems, and as cough medicine. Some euphorbia plants are used as remedy for boils and pimples. Cliff Rose is used with sagebrush and other plants for colds and fever. It is used to soothe and medicate back pains and muscle aches. Many other plants are used for different purposes, in combinations or in mixtures. Different parts of plants are used. In some plants, only the roots are used, some are the leaves, and some the whole plant. [Utah Navajo Development Council]

**49.13 RESPONSE:** See response to Specific Comment 47.28.

**49.14 COMMENT:** The Mule Canyon Indian ruin complex inside the WSA is a developed tourist attraction, which is publicized in the Trail of the Ancients promotional brochure. This is not wilderness solitude. The Mule Canyon area is extremely rich in archaeological sites. The 37 archaeological sites as mentioned in the Draft EIS is only the tip of an iceberg. There are perhaps more mounded ruins in the area than there are cliff dwellings. Evidence of ancient habitation can be seen almost everywhere in the Mule Canyon WSA. A wilderness designation of Mule Canyon would focus an impropotional amount of attention and people into this area, who would undoubtedly pick and poke and clean out these ruin sites. In all areas designated wilderness, this same thing would probably occur. The archaeological protection would have to increase a hundred fold, and even that probably would be insufficient. I don't see a feasible way of protecting the archaeology in this area--just Mule Canyon alone. What can you do, stop every person coming out and search him? [Paul Foreman]

**49.14 RESPONSE:** Mule Canyon ruin is outside of the WSA. Various techniques are being used to prevent vandalism and theft of cultural resources,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 49: MULE CANYON WSA (CONTINUED)**

including increased public education, increased patrols, and increased prosecution. Also see the response to General Comment 20.1.

**49.15 COMMENT:** The Draft EIS claims the Mule Canyon WSA contains a wealth of pristine cultural resources. Even though no comprehensive inventory has been performed, BLM admits that 37 recorded sites are found in the literature. Characteristic of these ruins found both on the mesa tops and lining the canyon walls, is the demonstration public site developed right on the edge of the WSA. This site has an excellent kiva, a tower of unknown purpose, and a long residential block. This is not an exception, many sites equal in significance are scattered through the WSA. While archaeological sites are known to exist, little is now known of the history of the many cultures that lived in this region. Not protecting sample sites will allow destruction of this cultural library preventing this history from being studied in the future. Wilderness designation carries no ambiguity on protection and scientific study of such sites. Other proposed management actions would allow continued ORV access to this area with the possibility of bull-dozing the plateaus. For one reason alone, outstanding opportunities for archaeological study, this area should be designated wilderness. [Utah Wilderness Coalition]

**49.15 RESPONSE:** See the response to Specific Comment 47.35.

**49.16 COMMENT:** BLM does not consider their ability to manage the nonwilderness area to protect the many values found in this area. This is a gross failure in the study and environmental assessment policies. Failure to analyze the ability to manage the preferred alternative is failure to describe the preferred alternatives potential for success. Long-term degradation of this area's natural resources and historic values is not assessed by BLM. This is an important issue needing comprehensive documentation in the wilderness study. Numeric estimates of archaeology destruction, wildlife population changes, recreation use changes, natural and special features lost need to be compiled for each alternative. The present analysis has vague generalizations which could apply to any Federal action on any acre of Federal land. These generalizations offer no information specifying the differences of environmental consequences between each alternative. The environmental analysis fails to meet the mandates of NEPA. [Utah Wilderness Coalition]

**49.16 RESPONSE:** BLM's Proposed Action for this WSA is the All Wilderness Alternative, which readily can be managed as wilderness. Information is presented and quantified in the EIS. This is done on a specific basis for each WSA, such as Mule Canyon, and on a cumulative, Statewide basis in Volume I.

**49.17 COMMENT:** Nondesignation will allow continued degradation from unmanaged off-road vehicles. Nondesignation will allow BLM to continue not inventorying wilderness values and not providing necessary protection. In the planning process, BLM is required to inventory biotic, recreational, geologic, and cultural resources. Most of these required inventories are not complete. BLM needs to list which inventories are required and reference those completed and those not completed. [Utah Wilderness Coalition]

**49.17 RESPONSE:** Nondesignation (No Action/No Wilderness Alternative) is not BLM's Proposed Action for this WSA. However, if Congress does not designate wilderness for the Mule Canyon WSA, it will be management in accordance with BLM's land use plan which provides managed off-road vehicles. Inventories listed in the comment are not required. See the response to Specific Comment 47.17.

**49.18 COMMENT:** The Mule Canyon WSA presents a exceptional opportunity to do a southern Utah wilderness hike in winter since this area is easily accessible from a paved road. There is a serious lack of hiking opportunities in winter since many roads in the area are not passable to passenger cars after a winter storm. [John Veranth]

**49.18 RESPONSE:** This information has been added to the EIS narrative in the Final EIS.

**49.19 COMMENT:** Mule Canyon WSA is undesirable as a wilderness for the following reason: for decades local residents have used Dog Tank Springs, which is in the WSA, for picnics and campouts. Primitive plumbing has been installed there to collect drinking water. Residue from old campsites still exists there. People have driven their vehicles into this area and pitched their tents there on the ground and spent days there on the grass and walking throughout the area. Once in times past, the Blanding Chamber of Commerce hosted a tour for 150 travel agents from across the country, and they kind of headquartered there a little bit at Dog Tank Springs. This is not solitude. The use of Dog Tank Springs has been extensive in the past and public access should not be denied,

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 49: MULE CANYON WSA (CONTINUED)

especially by vehicle in the future. Also, the north border of Mule Canyon WSA is a county maintained road which is used by stockmen and also delivers traffic to the Arch Canyon overlook. That road is used very much during the year, which detracts from the general wilderness solitude of the area. And also, the smallness of the Mule Canyon WSA makes it unsuitable for wilderness. The southern border is a paved highway. [Paul Foreman]

**49.19 RESPONSE:** The intrusions are described in the paragraph on naturalness in the Mule Canyon section of the EIS. BLM has determined that these intrusions and past activities do not detract from the wilderness values present in the WSA or cause the WSA to be unsuitable for wilderness designation.

**49.20 COMMENT:** The intrusions found at Dog Tank Springs are minimal and do not detract from the wilderness attributes of the area. [Henry Wright]

**49.20 RESPONSE:** The comment and the EIS information are consistent.

**49.21 COMMENT:** BLM has corrected their assessment of this area's solitude. In the Intensive Inventory BLM stated, "The pinyon-juniper forested tablelands and the deep, winding north and south forks of Mule Canyon with lush vegetation provide outstanding opportunities for solitude." BLM concludes in the SSA that 86 percent of the unit possesses this outstanding opportunity. Frequent field trips by our volunteers to this area verify that wilderness-grade solitude can be found in this area. BLM concluded in their unsuitability recommendation that the wilderness characteristics are "minimal." The BLM record and direct evidence gathered from the field do not support that conclusion. BLM offers no objective evidence supporting their conclusion of "minimal" values. This area has many outstanding wilderness activities and also has outstanding opportunity for solitude. This argument concerning wilderness characteristics is the only argument BLM gives to support their unsuitability recommendation. The BLM's recommendation that this area is unsuitable for wilderness designation solely based on "minimal" wilderness characteristics violates the Wilderness Study Policy. [Utah Wilderness Coalition]

**49.21 RESPONSE:** Both the Draft and Final EIS indicated that BLM's Proposed Action is the 5,990-acre All Wilderness Alternative for the Mule Canyon WSA.

**49.22 COMMENT:** Mule Canyon WSA has moderate to high wilderness values and low conflicts. There are conflicting reports on oil and gas potential that require further study. The same recommendation is made for this WSA as for the Grand Gulch ISA Complex, Road Canyon WSA, and Fish Creek WSA to protect the outstanding cultural values which may require special management attention. [State of Utah]

**49.22 RESPONSE:** Oil and gas information has been reviewed. The relatively low (f2) potential cited in the Draft EIS has been found to be correct for the Final EIS. Regarding cultural resource protection by an administrative designation in the three WSAs listed in the comment, see the responses to Specific Comments 46.33, 47.35, 47.39, and 48.33. Mule Canyon would be managed similarly to Fish Creek Canyon.

**49.23 COMMENT:** If BLM-Forest Service exchange of land in Utah is accomplished, the WSAs adjacent to the former Forest Service land should be reevaluated to determine how much they should be enlarged. An example is the Mule Canyon WSA which should be enlarged to include that part of Arch Canyon on present Forest Service land and that part of Arch Canyon on BLM land that was rejected as a WSA. [Owen Severance]

**49.23 RESPONSE:** The BLM-Forest Service land exchange, as previously proposed, is unlikely to occur. The adjacent Forest Service lands were released from wilderness consideration by Congress. See the response to Specific Comment 49.2.

## SECTION 50

### CHEESEBOX CANYON WSA

**50.1 COMMENT:** BLM violated their own Intensive Inventory Policy in determining the wilderness study boundary. This decision was appealed by the Sierra Club and many other environmental organizations. BLM failed to include all the natural parts of the candidate wilderness area. Extensive field checks by our volunteers find that the BLM boundary does not go to the edge of human impacts as required in the inventory process. The upper part of Hideout Canyon, K and L Canyon, and Deer Canyon have no human impacts up to the Shinarump Member of the Chinle Formation. The boundary should be moved to include these natural lands. Also BLM incorrectly separated this WSA from Natural Bridges National Monument-



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

because of the presence of State lands in the canyon. IBLA decisions have ruled that BLM cannot drop area, based upon the presence of State lands. In the initial inventory, BLM also failed to consider for wilderness study Deer Canyon, the low part of which runs into Natural Bridges National Monument. The State plans to exchange the State sections in this region. When exchanged, Deer Canyon would join White Canyon and Cheese Box Canyon WSA. This additional area needs consideration for designation as a wilderness area. BLM raised no serious conflicts to prevent wilderness designation of this area. Violations of the wilderness policy in assessing wilderness qualities and the management of leases and claims invalidate the remaining BLM arguments against wilderness designation. Correct application of the policy with objective assessment of the area's values confirm that this area does qualify for designation as a wilderness area. [Utah Wilderness Coalition]

**50.1 RESPONSE:** See the response to General Comment 3.1.

**50.2 COMMENT:** We encourage BLM to reconsider its decision not to recommend Cheesebox Canyon for wilderness designation. The Utah Wilderness Coalition's 25,000-acre proposal should be studied for the Final EIS. This would include the adjacent Deer Canyon area and the 15,140 acre Cheesebox Canyon WSA. [Sierra Club, Cache Group]

**50.2 RESPONSE:** BLM has reviewed the Proposed Action and has determined that Cheesebox Canyon should not be proposed for wilderness designation. See Appendix 11 in Volume I for a summary of the rationale for the Proposed Action.

**50.3 COMMENT:** From the beginning of the wilderness process, State land has been used to partially establish the boundaries of WSAs. Now that the State says it is willing to exchange that State land, new WSA boundaries should be drawn that ignore the presence of State land. Cheesebox Canyon WSA is a good example of a WSA that was reduced in size because of State land. If the State land is ignored, the boundary on the west would be Soldier Crossing; the WSA boundary on the southwest would be Natural Bridges National Monument; and both Deer Canyon and Hideout Canyon would be included in the WSA. These additions would make a substantial difference in the size and character of the WSA. There are many other WSAs that would significantly change in size if the presence of State land is ignored. [Owen Severance]

**50.3 RESPONSE:** The State now takes the position that State in-holdings generally will not be exchanged. See the response to General Comment 6.3, Appendix 3 in Volume I, and the revised narrative on State lands in Chapter 1 in Volume I.

**50.4 COMMENT:** This WSA is a prime example of BLM violating the intent of the wilderness study process by using the presence of State land to eliminate much of the roadless area. This WSA should have been the White Canyon WSA by including about 15 miles of White Canyon along with Cheesebox Canyon, Hideout Canyon, K and L Canyon, and part of Deer Canyon as shown on the accompanying map. I disagree with BLM on the amount of land that lacks outstanding solitude and primitive recreation values. Highway U-95 is not a major intrusion beyond the southern and western rim of White Canyon. The sight of the highway in the distance can actually enhance the feeling of solitude. Sounds from the highway are not heard inside the canyons. By eliminating the northern part of the WSA, most mineral conflicts are avoided. All of the WSA is classified as Class A scenic quality and VRM Class II. White Canyon and its tributaries are narrow, twisting, rugged canyons which vary in depth from about 100 feet in the west (photo 47) to about 400 feet near the mouth of Hideout Canyon (photo 48). The canyons are entirely natural and provide outstanding opportunities for solitude. Traversing the canyons is challenging due to pour-offs and pools of water. Outstanding opportunities for primitive recreation include photography, backpacking, dayhiking, rock scrambling, swimming in the plunge pools, and exploring side canyons, sculptured sandstone formations, and Indian ruins. White Canyon is a spectacular wilderness and it should be included in BLM's wilderness recommendation as shown in my Modified All Wilderness Alternative. [Owen Severance]

**50.4 RESPONSE:** See the responses to General Comments 3.1 and 3.7.

**50.5 COMMENT:** While we support the All Wilderness Alternative of all 15,410 acres of the WSA, BLM has failed to identify a Partial Wilderness Alternative. This is a significant omission that should be rectified in the Final EIS for more full analysis. [Marvin Poulson]

**50.5 RESPONSE:** The conditions which influence wilderness qualities with the All Wilderness Alternative would continue to influence partial alternatives. A partial alternative with only the deep parts (i.e. canyon

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

bottoms) of Cheesebox, White, Hideout, and K and L Canyons within the WSA would not meet the 5,000-acre size criterion.

**50.6 COMMENT:** Access to this area, even foot traffic through Grand Gulch, is having a significant impact. We suggest that BLM consider controlling access to this area to minimize these impacts. [Wasatch Mountain Club]

**50.6 RESPONSE:** See the response to Specific Comment 47.12.

**50.7 COMMENT:** BLM's recommendation for nonwilderness, based solely on the impacts of outside sights and sounds, violates the intent of the wilderness review. BLM's failure to consider Coalition comments on the solitude issue violates the NEPA process. Members of the Coalition raised the outside sights and sounds issue and BLM failed to consider our issue in this EIS. BLM failed to follow the direction Congress gives in assessing outside sights and sounds. BLM failed to include all the natural lands in the WSA lands. Some of them with the area's better wilderness values, were deleted in violation of the inventory policy. This policy requires that the boundary be chosen to include the natural lands and exclude significant human impacts. [Utah Wilderness Coalition]

**50.7 RESPONSE:** BLM has determined that the overall wilderness attributes of the Cheesebox WSA do not warrant inclusion of this WSA in the Proposed Action. See the response to Specific Comment 26.52.

**50.8 COMMENT:** BLM's assessment of the impacts of roads on solitude is inconsistent. [Michael Salamanca and Kathryn Kokke Wood]

a. According to BLM, roads outside of some WSAs intrude into the solitude, i.e., U-95 outside Cheesebox Canyon, while in other WSAs they help add to the feeling of isolation, i.e., San Rafael Reef, I-70 and U-24. And in still others, i.e., Road Canyon, a dirt road in Comb Wash was enough to cause elimination from BLM proposal of the flat below the canyon. This is inconsistency at its worst.

b. The boundary roads are not noticeable at all from the canyon bottoms, which are probably the chief destination of most visitors. How can the distant car lights of U-95 be considered an intrusion but in Behind-the-Rocks the lights of an entire city only a

mile away are a dwarfed impact? How much night traffic is there on U-95?

**50.8 RESPONSE:** See the response to Specific Comment 47.14.

**50.9 COMMENT:** Per Volume I, the Proposed Action "includes all areas and acres currently judged by BLM to meet the test of suitability. Units may have low wilderness values but no identified conflicts with other resources." I basically agree with this criteria, however, I wish to comment on how the criteria was applied. There are many areas where the Draft EIS identifies no conflicts with other resources which were not proposed for wilderness. These areas lack significant human imprints and are manageable as wilderness, therefore, by BLM's own criteria they should have been recommended. Specific examples include: the area between the road and the canyon rim in Mexican Mountain WSA, the entire Cedar Mountain range, large portions of the King Top WSA, the Cheesebox WSA, the south portion of the Scorpion WSA, much of Mt. Pennell, etc. [John Veranth]

**50.9 RESPONSE:** See the responses to General Comments 3.5 and 3.14.

**50.10 COMMENT:** The rationale for BLM's Proposed Action should be included in the EIS. [Scott Delong and Roger Jenkins]

a. Why have you recommended "No Wilderness" for Cheesebox Canyon? Reading the Draft EIS does not give a clue. "It has been determined that no coal, potash, geothermal, or other leasable resources, with the exception of oil and gas, are present in this WSA." Ah, so the area has large reservoirs of oil and gas right? NO! ". . . all wells that have been drilled in this general area are now abandoned . . . If oil and/or gas existed in the Paradox Formation and overlying units in the WSA, there is a good chance it has drained away . . ." Well, maybe there are other mineral conflicts? "Because copper, vanadium, and uranium are so closely associated on the Colorado Plateau and because this area is not favorable for uranium, the WSA is assigned a low favorability for these minerals." The Draft EIS makes clear that this is a beautiful and scenic area that would be perfect for primitive recreational opportunities. It also makes clear that there are no real conflicts with wilderness designation. It is obvious that this entire WSA should be designated as wilderness. The wilderness values of Cheesebox Canyon overwhelmingly outweigh the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

extremely slight chance of mineral extraction in the WSA.

b. I was surprised to learn that BLM had recommended this area for nonwilderness. No justification was explicitly stated, and "reading between the lines" revealed no major conflicts. The area is quite lovely and is readily accessible from Utah 95, making it a good day use area. Therefore, I support the All Wilderness Alternative.

c. Your proposal for Cheesebox Canyon is perplexing in the extreme. The Draft EIS states: "The canyons are precipitous. . .and erosion has produced picturesque buttes, arches, and natural bridges." "The entire WSA . . . contains Class A scenery. Class A scenery combines the most outstanding characteristics of the physiographic region." "Traversing the canyons is . . . challenging due to pour-offs or pools of water . . . Hiking and camping opportunities include backpacking, dayhiking, rock scrambling, swimming in the plunge pools, hunting, and exploring and discovering side canyons, seeps, pools, sculptured sandstone formations, and ancient Indian ruins . . ." To put this into the language of the Wilderness Act: this area has outstanding recreational opportunities, is highly scenic, has archeological and historic special features, and is an important wildlife habitat. The only thing that the Draft EIS states that this area does not have is outstanding opportunities for solitude. I will refrain from questioning your integrity and merely state that this is a problem of your own making. The Draft EIS says that one problem with this WSA is that it is too narrow. I agree 100 percent. The Draft EIS uses this argument to recommend no wilderness for Cheesebox. I disagree entirely. The canyons to both the east and west of Cheesebox are beautiful and largely untouched by man. This WSA is "too narrow" only because some narrow-minded bureaucrats drew the boundaries that way. This can be easily resolved. The Draft EIS also states that the proximity of Highway 95 will detract from the wilderness qualities of this area. Anyone who has ever hiked here knows that is just not true. Salt Lake City lies immediately below three Forest Service wilderness areas, and the presence of that huge metropolis does not detract from the wilderness qualities of those wildernesses. Certainly the presence of little old Highway 95 is not going to make much of a difference here.

**50.10 RESPONSE:** The rationale for the BLM Proposed Action is given in Appendix 11 in Volume I of the Final EIS.

**50.11 COMMENT:** Why did BLM allow various non-wilderness activities to occur in this WSA during the past 5 years? These activities have included: (1) 200 exploratory wells and (2) 10 miles of seismograph lines. Do not these actions violate the Congressional mandate to maintain wilderness qualities until lands are released from consideration? [Sierra Club, Cache Group]

**50.11 RESPONSE:** In 1982, a nonimpairing seismic geophysical exploration project was approved for the WSA. This project consisted of drilling shallow exploratory holes every 230 feet along 2 miles of existing way. A portable drill rig was used, new access was not required, and a minimum of site preparation was needed. The entire process disturbed approximately 1 acre and it was reclaimed to a substantially unnoticeable condition. These activities were consistent with BLM's IMP guidelines.

**50.12 COMMENT:** It is stated that if the All Wilderness Alternative were chosen, "upon designation, acquisition of one State land section adjacent to the WSA (refer to map #1) would be likely." However, there is no designation on map #1 or in the text as to which of the five State land sections would be acquired by trade. [Charles Bagley]

**50.12 RESPONSE:** The specific State section was identified in the Draft EIS, Appendix 3 in Volume I, as Township 35 South, Range 17 East, Section 32. It is no longer proposed for exchange due to a change in policy by the State as explained in Chapter 1 in Volume I. See the response to General Comment 6.3.

**50.13 COMMENT:** While BLM admits that this area contains wilderness designation criteria for solitude, wilderness activities, and naturalness, now this is not enough. BLM consistently underrates the wilderness qualities in this area and at the same time exaggerates management problems and mineral conflicts to support dropping this area. [Utah Wilderness Coalition]

**50.13 RESPONSE:** Management problems and mineral conflicts are not major determining factors for the BLM Proposed Action. See Appendix 11 in Volume I.

**50.14 COMMENT:** I wish to correct certain items of inaccuracy presented in the information. The objective of the Statewide wilderness study is to locate areas for wilderness designation if they meet adequate criteria and have no sufficiently disabling

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

negative features. The description of this WSA, as outlined in the recent draft, states that, "The entire WSA (15,140 acres) contains Class A scenery. Class A scenery combines the most outstanding characteristics of the physiographic region. The WSA contains both low and high sensitivity areas." Although there are some intrusions by works of man, these are not major. A road in the north end of the WSA is now maintained only by vehicles, which removes it from a negative impact feature. Although there is evidence of uranium mining on the bluffs just outside the WSA and a road on the southern border, these are not intrusive. [Charles Bagley]

**50.14 RESPONSE:** See the response to Specific Comment 50.7.

**50.15 COMMENT:** The EIS says that "Vegetation in the canyon bottoms varies from very sparse in Cheesebox, Hide Out, and K and L Canyons to scattered cottonwoods and tamarisk in White Canyon." That's not quite the way it is. White Canyon is the one that has the sparse vegetation, which only makes sense because the water comes down through and washes White Canyon out. It gets flushed out fairly often. The side canyons don't get flushed out quite as often. Cheesebox Canyon, Hide Out Canyon, and K and L Canyon probably have heavier vegetation than White Canyon by a factor of about three or four times. As soon as you leave White Canyon, if you're in the bottom of White Canyon and turn in to walk into Cheesebox Canyon or one of the others, the most noticeable thing there is the fact that all of a sudden there's a whole lot more vegetation. There's more grass, more shrubbery, more pinions and junipers, and more cottonwoods. [Stephen Gilsdorf]

**50.15 RESPONSE:** The amount of vegetation varies at differing locations within the WSA. BLM believes that the text of the EIS generally is accurate.

**50.16 COMMENT:** Southeast Utah is widely known for large deposits of ore-bearing formations. Many active and abandoned mines dominate the landscape. UP&L controls over 300 valid mining claims and has, through a 10-year exploration drilling program, proven ore reserves in excess of 3 million pounds of uranium ( $U_3O_8$ ). Utah Power & Light's base reserves are located adjacent to the Cheesebox WSA and the already designated Dark Canyon wilderness area. [Utah Power and Light]

**50.16 RESPONSE:** Consistent with the BLM Wilderness Management Policy (BLM Manual 8560), the public land adjacent to designated wilderness areas would not be managed as "buffer zones." BLM is not proposing wilderness designation for the Cheesebox Canyon WSA.

**50.17 COMMENT:** The evaluation for oil and gas in Cheese Box is rated by DOE to contain "low volume." Unsupported by the record, BLM incorrectly concluded in their SSA that the potential for oil and gas production is "moderate." [Utah Wilderness Coalition]

**50.17 RESPONSE:** The minerals information has been reviewed. The rating in the Draft EIS (f2/c1) has not been changed for the Final EIS.

**50.18 COMMENT:** Table 1 is a summary of the environmental consequences and contains numerous exaggerations which should be corrected. At the top of both columns, there is a discussion of mineral and energy resources. However, it is evident throughout the text, as cited above in my discussion, that there are negligible oil, gas, uranium, copper, and any other mineral resources in the area. This is stated numerous times throughout the discussion of the text. For this reason, under both alternatives, energy and mineral resources should be designated as minimal and not relevant to the decision. [Charles Bagley]

**50.18 RESPONSE:** The summary table has been revised. BLM concurs with the view expressed.

**50.19 COMMENT:** Considerable discussion is devoted to the mineral production impact if wilderness is designated. However, according to the EIS, "It is unlikely that minerals would ever be commercially produced from this WSA, even without wilderness designation." This is because of the particularly unfavorable geological settings, even despite the numerous claims developed, it is estimated that only 20 acres of the WSA would be damaged. Although some road closures would be necessitated by wilderness designation, these would be minimal. "Use of ORVs in the Cheesebox Canyon WSA is minimal and closure of the WSA to vehicle use would result in little change from the current situation." [Charles Bagley]

**50.19 RESPONSE:** The analysis assumptions in the Final EIS indicate that mineral exploration and development is not expected in the WSA, regardless of wilderness considerations. It is likely that continued

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

uranium exploration and extraction may occur in the future for the mesas adjacent to and above the WSA.

**50.20 COMMENT:** The promising uranium formations were deleted from the WSA in the inventory, in violation of wilderness review policies. [Utah Wilderness Coalition]

**50.20 RESPONSE:** The nearby uranium formations were not included in the WSA due to the disturbance impacts from mineral exploration and mining activity, not because of the presence of the uranium resource.

**50.21 COMMENT:** The presence and potential of salable minerals should be addressed, not their availability. Does the statement "no salable materials are available in the WSA" mean there are no saleable minerals present or does it mean that the salable minerals present are not available for disposal?

**50.21 RESPONSE:** The wording has been revised to indicate that such materials are not present.

**50.22 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**50.22 RESPONSE:** See the response to Specific Comment 39.16.

**50.23 COMMENT:** With regard to mineral and energy resources, the Draft EIS states that little, if any, potential exists within the WSA for economically viable resources. The likelihood that any of the 5,900 acres of pre-FLPMA oil and gas leases will be developed prior to expiration is virtually nonexistent. In no way can, nor should, these leases impact judgments relating to wilderness designation. They simply are not a viable factor. [Utah Wilderness Association]

**50.23 RESPONSE:** The analysis assumptions for the Final EIS indicate that no oil and gas exploration

or development is expected in the WSA, regardless of wilderness considerations.

**50.24 COMMENT:** The Cheesebox Canyon WSA is important to bighorn sheep. [Sierra Club, Cache Group, and Utah Wilderness Coalition]

a. Cheesebox Canyon and the immediate surrounding area provides crucial habitat for bighorn sheep.

b. In the MFP record, the majority of Cheese Box is important bighorn sheep habitat and more importantly, part of the unit is a critical lambing area. All of the other bighorn sheep areas in this planning unit have been dropped in previous inventory stages, leaving only Cheese Box. This area offers outstanding habitat not only for bighorn sheep but also for deer.

**50.24 RESPONSE:** The EIS reports that the WSA is part of the White Canyon-Red Canyon Desert Bighorn Habitat Management Area. Deer habitat in the WSA is not considered to be outstanding.

**50.25 COMMENT:** The Cheesebox WSA presently gets use from desert bighorn sheep. King (1985) found that bighorn sheep showed a negative response to human disturbance; the more sheep were disturbed by vehicles, hunters, wood cutters, and hikers, the more time they spent in escape or being alert. This escape and alert behavior is a drain on the biological reserves of sheep which makes the animals more susceptible to predation and disease. Establishing wilderness in Cheesebox Canyon would benefit sheep by assuring minimal disturbance caused by human activity such as mining and off-road vehicle use. Natural Bridges National Monument Resource Management Plan, page 31, has identified the possibility of reintroducing desert bighorn into the monument. Bighorn sheep have been sighted on the west slopes of Deer Flat, which is part of the WSA. The Cheesebox designation as a wilderness area would complement Natural Bridges National Monument if sheep were to be released in the monument. [National Park Service]

**50.25 RESPONSE:** BLM concurs that bighorn sheep would benefit from solitude. No disturbance from mineral developments is expected in the WSA with or without wilderness designation. Also, visitor use is expected to increase from the existing 300 visitor days per year with or without wilderness designation. Potential for increased vehicular activity within the WSA is limited because of terrain and surface features. Thus, wilderness designation would not

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

automatically provide more seclusion to bighorn sheep within the WSA. No disturbance from developments (mining, ORV use, etc.) in the WSA is expected with either alternative.

**50.26 COMMENT:** The San Juan County Commissioners made the statement there was wood gathering by the Indian tribes. Well, that's not quite right because Utah 95 goes right alongside the canyon and so to get very much wood out of there, the Indians would have to climb to get down and then they would have to climb up the other side to get to the wood. So I don't think the Indians gather very much wood out there. [Stephen Gilsdorf]

**50.26 RESPONSE:** See the response to Specific Comment 47.27.

**50.27 COMMENT:** In the Cheesebox Canyon section, it says "Most of the sandstone in the unit is light buff to gray colored, although several of the buttes display the alternate red-and-white bands characteristic of the Cedar Mesa sand stone complex." Well, there are two buttes in that WSA; one is Cheesebox Butte, the other one is Lone Butte. Neither one of those buttes are Cedar Mesa sandstone. Neither one of those buttes have red-and-white bands. Both of those buttes are solid color. They're the deep, dark, rich, red color of the Moenkopi sandstone formation. Both of those buttes are a different formation and a different color than the way you have them described here. [Stephen Gilsdorf]

**50.27 RESPONSE:** The sentence in question has been revised to clarify that the buttes are predominantly reddish-brown in color.

**50.28 COMMENT:** The EIS failed to report that there are outstanding opportunities for horseback riding and other special features in the WSA. [Sierra Club, Cache Group; and Utah Wilderness Coalition]

a. Horseback riding also is outstanding, based upon a recent trip taken in White Canyon by horseback. Other special features are not adequately inventoried and are yet to be discovered. These include archaeological resources and threatened and endangered species. When these required inventories are completed, more will be found to support wilderness designation.

b. Important horseback riding opportunities in this WSA have not received adequate analysis by BLM.

**50.28 RESPONSE:** Very little horseback riding is done in this WSA. Horseback riding is possible in a few areas, but the rough terrain constrains the opportunities for horseback riding in many parts of the WSA. Special inventories are not required for the EIS. See the response to Specific Comment 47.17.

**50.29 COMMENT:** Wilderness designation will protect important cultural resources in the WSA. [Sierra Club, Cache Group; and Stephen Gilsdorf]

a. This entire WSA has important Anasazi ruins. Wilderness designation as proposed by the Utah Wilderness Coalition will better protect these important scientific resources.

b. Archaeological resources are worth protecting in this area.

**50.29 RESPONSE:** See the response to Specific Comment 47.35.

**50.30 COMMENT:** There's wildlife base there, including White Canyon-Red Canyon desert bighorn sheep herd. There are outstanding opportunities for solitude in this WSA. There are outstanding opportunities for primitive and unconfined recreation. Another thing that I think is a benefit is that there's very easy access from Utah 95, the highway right there. And the area is close to Natural Bridges and the Dark Canyon WSA. Also White Canyon has been considered for inclusion in the National Wild and Scenic River System. And not as a rafting river, but as a good example of an intermittent stream. [Stephen Gilsdorf]

**50.30 RESPONSE:** BLM has determined that about 60 percent of the WSA has outstanding opportunities for solitude and primitive recreation. The recreation text of the EIS identifies that White Canyon is on the inventory list for potential consideration under the Wild and Scenic Rivers Act.

**50.31 COMMENT:** The topography of the Cheesebox Canyon and adjacent wild lands provide a rich diversity of opportunities for primitive and unconfined recreation, including but not limited to: hiking, backpacking, rock climbing, sightseeing, geologic study, photography, and natural desert riparian habitat study. Contrary to the agency's judgment that only 9,310 acres offer outstanding recreational opportunities, virtually the entire 15,410 acres provide such opportunities for at least three forms of recreation. It is curious that BLM's judgment apparently contains

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

complete overlap of acreages offering outstanding solitude and recreational opportunities. Such complete meshing of values raises questions about the agency's ability to distinguish between wilderness characteristics. [Utah Wilderness Association]

**50.31 RESPONSE:** Common recreation opportunities in the WSA are noted in the EIS. Also, see the response to Specific Comment 26.52.

**50.32 COMMENT:** In the Draft EIS, BLM states that opportunities for recreation are outstanding but incorrectly concludes that these are limited only to the canyon bottoms. Even if the incorrect BLM conclusions are accepted, this area still qualifies for designation. BLM correctly concludes that there are no management problems with wilderness. BLM's only argument for nonwilderness of the unit is the claims that wilderness quality recreation and solitude are not enough. [Utah Wilderness Association]

**50.32 RESPONSE:** See the response to Specific Comments 50.7 and 50.13.

**50.33 COMMENT:** It was recommended by BLM as a primitive area back in the days prior to now when some of the other areas in this county were primitive areas. [Stephen Gilsdorf]

**50.33 RESPONSE:** Previous management considerations are not significant in the wilderness study process, except where special management areas had actually been established (such as Dark Canyon and Grand Gulch).

**50.34 COMMENT:** BLM's assessment of opportunities for solitude is not accurate. [Utah Wilderness Coalition]

a. BLM deviates from the study policy in assessing solitude in two areas. The first deviation incorrectly limits areas having wilderness-grade solitude to those with vegetation and rock confinement. The IBLA has ruled this limited assessment not correct. Secondly, BLM relies on intrusions outside the area to assess the opportunities for solitude. The intrusions cited include airplane flights, vehicle traffic on the boundary road, and 20-year-old mining activities which occurred outside the WSA. Congress laid this argument to rest when it stated, "The 'sights and sounds' of nearby Albuquerque, formerly considered a bar to wilderness designation by the Forest, should, on the contrary, heighten the public's awareness and

appreciation of the area's outstanding wilderness values" (House Report No. 95-330). This also applies here and BLM has not offered adequate evidence refuting this. To drop an area solely on the basis of "outside sights and sounds" would violate the intent of Congress. The inconsistencies in BLM arguments, the lack of objective evidence supported by the Wilderness Study Policy, and ignoring documented supplemental wilderness values and other outstanding wilderness activities makes BLM proposal conflict the Wilderness Study Policy.

b. BLM consistently underestimates wilderness values and recommends against wilderness for many WSAs because of what it calls a "lack of opportunities for solitude." For example, the Draft EIS claims that much of the Cheesebox Canyon WSA lacks solitude because of outside sights and sounds on the boundary road. Such intrusions are minimal; moreover, the Congress has repeatedly declared that outside sights and sounds do not argue against wilderness designation. The 28,000 people who drive annually up Little Cottonwood Canyon from Salt Lake City do not substantially interfere with the wilderness experience of visitors to Utah's Lone Peak wilderness. Neither did the impressive view from the top of the peak to the urban area in the valley below disqualify it for wilderness designation.

**50.34 RESPONSE:** See the response to Specific Comment 47.13. Distance and effect (soft or harsh) are factors which relate to the differing impacts from outside developments or conditions.

**50.35 COMMENT:** We raised concerns regarding wilderness designation for the Cheesebox WSA as a wilderness area during the previous scoping sessions and prior written comment period. This WSA has sustained substantial impacts from manmade disturbances, active mining, hauling on the nearby highway, traffic to and from Glen Canyon recreation area, development of valid existing mining claims, and grazing. If Cheesebox is designated wilderness, UP&L's chargeable costs to its uranium claims, mines, and investment on nearby Deer Flat will increase because of requirements to protect a new, nearby wilderness area. The threat of buffer zone protection is substantial. Its marginal acceptance as a WSA demonstrates that its 6,100 acres do not offer outstanding opportunities for solitude. [Utah Power and Light]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

**50.35 RESPONSE:** The adjacent mining is described in the EIS. Also, see the responses to Specific Comments 50.7, 50.19, and 50.20.

**50.36 COMMENT:** The affect of U-95 on opportunities for solitude has been overstated. [Sierra Club, Cache Group; Charles Bagley; and Stephen Gilsdorf]

a. It is twice stated that 6,100 acres of the WSA do not offer outstanding opportunities for solitude. However, because of the depths of the canyons, actually a large part of this 6,100 acres would, in fact, offer excellent solitude. The only areas lacking visual solitude would be the tops of cliff walls and the highland plateaus at eastern margins of the WSA, from which one might possibly look across at the mining activities to the south side of White Canyon Road. However, it is unlikely that people seeking solitude would go to such areas. Thus, it is erroneous to claim that 6,100 acres of the WSA do not offer outstanding solitude opportunities. The true figure may be only 2,000 acres or so, and totally intermingled with the outstanding solitude areas.

b. We disagree that the area has low quality solitude and few opportunities for primitive recreation. Several of our members found, during a March, 1986 trip, that Cheesebox Canyon provided unique opportunities for primitive recreation in a very natural setting with high quality solitude. We also disagree with BLM's findings that this WSA has significant human impacts. We think that these claims have been exaggerated.

c. Solitude is not impaired by Highway 95. Based on my knowledge of that area, once you drop off the rim there into White Canyon, you don't hear anything from Highway 95. White Canyon must be 500 or 600 feet deep, and when you get down into the bottom of that canyon, the noise from the highway is way up above somewhere and you simply don't notice it.

**50.36 RESPONSE:** The 6,100 acres lacking solitude do not include the canyons. The EIS states that the canyons offer outstanding solitude. The mesas do not offer outstanding opportunities for solitude.

**50.37 COMMENT:** In addition to the special features mentioned in the Draft EIS, there is potential for several special vegetative features. These being the rare and potentially endangered: Erigeron kachinensis, Astragalus cottomi, Astragalus monumentalis, and Zygadenus vaginatus. Both E. kachinensis and Z.

vaginatus are late season bloomers (rare for both species in an otherwise arid environment) dependent on sandy seeps as prime habitat. Such isolated habitats are a rare occurrence of interest in this canyon environment and represent a special feature of particular scientific interest. [Marvin Poulson]

**50.37 RESPONSE:** Erigeron kachinensis is a Category 2 candidate species. This information has been added to the Final EIS.

**50.38 COMMENT:** Compared to other WSAs in the region, Cheesebox Canyon WSA has moderate wilderness-quality values and moderate to low conflicts. The same recommendation is made for this WSA as for the Grand Gulch ISA Complex, Road Canyon WSA, Fish Creek WSA, and Mule Canyon WSA to protect the outstanding cultural values which may require special management attention. [State of Utah]

**50.38 RESPONSE:** No surface disturbance due to mineral exploration or development activity is projected for the Cheesebox Canyon WSA. Only 2 acres of disturbance due to construction of one livestock reservoir and 0.5 mile of fence is anticipated. Also see the responses to Specific Comments 46.33, 47.35, 47.39, and 48.32.

**50.39 COMMENT:** Comment is made that San Juan County has development plans that are inconsistent with wilderness designation here. However, it is stated that San Juan County has a blanket objection to any more wilderness designation in the entire county and this does not imply any specific objection that they have to this site. [Charles Bagley]

**50.39 RESPONSE:** See the response to General Comment 23.8.

**50.40 COMMENT:** The National Park Service wants to protect this area for Natural Bridges National Monument. NPS is even interested in trading land for it. [Sierra Club, Cache Group]

**50.40 RESPONSE:** There are no plans to transfer the Cheesebox area to the National Park Service. See General Comment Response 3.24.

**50.41 COMMENT:** Under both alternative sections, "socioeconomic," the figure is raised of \$19,230 per year, additional revenue being available from this WSA, and this figure is added to the \$27,220 per year currently being paid by leaseholders. However,



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

that \$19,230 figure could only be achieved if all of the remaining leasable land were leased and in the relatively near future. In fact, given the low mineral potential and the lack of any developments of any leases over the past many years, it would be totally hypothetical and extremely unlikely that any further leases will be made in the area. Thus, the figure of \$19,230, as well as the figure \$46,230 and all references to these, should be omitted from both the Summary Table 1 and also, in the text, should be designated as totally speculative and highly unlikely to be realizable. [Charles Bagley]

**50.41 RESPONSE:** Many locations on public land are leased because of the interest of prospective lease holders to further investigate mineral potential, even through available information suggests a low potential. It is possible that future leasing could occur in the WSA with the No Action/No Wilderness Alternative.

**50.42 COMMENT:** Page 20, Cultural Resources, Paragraph 2: as written, the sentence does not make sense. [State of Utah]

**50.42 RESPONSE:** The sentence in question has been revised.

**SECTION 51**  
**DARK CANYON ISA COMPLEX**

**51.1 COMMENT:** The BLM wilderness inventory for this area is erroneous. [Sierra Club, Cache Group; and Utah Wilderness Coalition]

a. The upper part of Dark Canyon begins in the Abajo Mountains in a roadless area recommended for wilderness designation by the Forest Service. BLM's portion of Dark Canyon ends and joins the lower canyon area against another wilderness proposal by the NPS in the Glen Canyon NRA. The multiple unique wilderness found in this complex makes this joint recommendation for wilderness designation the only rational choice. While BLM labels this an "all wilderness" recommendation, this is not true. In both the initial and intensive inventories, BLM dropped more than 62,000 acres. BLM violated the Inventory Policy, describing boundaries and intrusions to fragment this large area into more than 10 separate areas.

b. Inconsistent with Instant Study Areas (ISAs) in other BLM Districts in Utah, the Moab District divided one BLM roadless area into 13 different areas. This created many small areas bounded by roads, the existing primitive area boundary, and non-BLM lands. The Inventory Policy prohibited using BLM administrative boundaries to divide units and explicitly stated that subdivision of areas less than 5,000 acres was not allowed.

c. There are additional neighboring lands that should be included in BLM's final report to Congress. These lands are included in the Utah Wilderness Coalition's 119,300-acre Dark Canyon proposal.

d. Some of these areas contain special wilderness values, especially archaeological resources, and should have been included in the wilderness study. The single archaeological sample area possessing the largest number of sites in the Beef Basin Planning Unit was found in Bull Valley. This is a site BLM claimed lacked natural character because of a vehicle way in dense sagebrush. BLM exaggerated the significance of human impacts in the subdivided units surrounding Dark Canyon. In the inventory, BLM described the presence of chainings in some areas (Youngs Canyon, Fable Valley, and Black Steer Corridor). Recent field investigations have proven that these occurred so long ago that there is no significant evidence of impacts. In one area, seedings were claimed to impact the area (Lower House Flats). Those impacts are not now evident. Several of the areas were incorrectly described by BLM to contain roads (Lower Horse Flats, Sweet Alice Canyon, Bull Valley, Middle Point, and Bowdie Canyon Plateau). BLM has no record of any construction, periodic maintenance, and regular use for vehicle ways within any of these areas. Field evidence shows that these vehicle ways do not offer significant impacts to these areas. In a few cases, minor boundary changes and cherry-stemming would remove the few significant intrusions. We request BLM to reinventory these areas and produce information supporting the inventory. The end result is that BLM deleted more than 62,000 acres by illegally fragmenting this area into many small units and then incorrectly assessing the impacts of those areas. In view of the inaccuracies of the inventory in this area, these natural areas adjoining the primitive area need to be studied for wilderness with the ISA. Analysis of this alternative is requested.

**51.1 RESPONSE:** The Dark-Woodenshoe Canyon Wilderness Area of 45,000 acres in the National Forest

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 50: CHEESEBOX CANYON WSA (CONTINUED)**

was designated by Congress in 1984. BLM's inventory, which established the boundaries for the WSAs in the Dark Canyon Complex, has been completed and will not be redone. See the response to General Comment 3.1.

**51.2 COMMENT:** The statement regarding remoteness and lack of defined access to Gypsum Canyon is incorrect. An excellent trail, following old vehicle ways in part, leads from the easy jeep road in Beef Basin to the upper part of Gypsum Canyon. [John Veranth]

**51.2 RESPONSE:** The trail stays on a bench above Gypsum Canyon and goes into Fable Valley. The statement in the EIS relative to lack of access into Gypsum Canyon is correct.

**51.3 COMMENT:** Access to this area, even foot traffic through Grand Gulch, is having a significant impact. We suggest that BLM consider controlling access to this area to minimize these impacts. [Wasatch Mountain Club]

**51.3 RESPONSE:** See the response to Specific Comment 47.12.

**51.4 COMMENT:** There are inconsistencies in the discussion of State lands. [State of Utah and Owen Severance]

a. For the All Wilderness Alternative, why is the acquisition of the adjacent State sections not likely? They were identified for exchange in Volume I.

b. The maps in the text should indicate which State land is proposed for exchange. I had to transfer the information from Appendix 3 to each map - a long (but informative) process. There are several inconsistencies in this list. For example, in the Grand Gulch ISA Complex, Section 32, Range 18 East, Township 38 South, is proposed for exchange, but Section 16, Range 18 East, Township 40 South, is not. Why? Also, most of the split-estate land in the WSAs is to be exchanged; however, none of the split-estate land in the Dark Canyon ISA Complex is proposed for exchange. Again, why?

c. The three State sections total 1,920 acres.

**51.4 RESPONSE:** No State lands now are proposed for exchange. See the response to General Comment 6.3 and revised information in Chapter 1 of Volume I.

The three split-estate sections in the Dark Canyon WSA were shown in error on Map 1. The State mineral leases were relinquished in 1984, consequently, both surface and subsurface now are Federal land. There are no State lands within the ISA and the map has been revised for the Final EIS.

**51.5 COMMENT:** BLM should propose the All Wilderness Alternative. [Utah Wilderness Coalition and Anthony Williams]

a. BLM's recommendation of the No Action/No Wilderness Alternative is a terrible mistake. As the EIS makes clear, the Dark Canyon ISA "contains class A scenery," "provides . . . outstanding opportunities for backpacking and camping, . . . offers outstanding opportunities for solitude," includes "a miniature Grand Canyon." Surely this qualifies the Dark Canyon ISA Complex for wilderness designation. There are no reasons not to so designate it. The EIS makes clear that the "oil and gas favorability" and "locatable mineral potential" are considered very low. Hence wilderness designation would not be likely to limit future mineral development, nor would it limit grazing activity.

b. No significant nonwilderness developments can be found. Even if found, the extraordinary wilderness values would far outweigh any mineral found.

**51.5 RESPONSE:** BLM's Proposed Action in both the Draft and Final EIS is the All Wilderness Alternative, designating the entire 68,030 acres.

**51.6 COMMENT:** The section on Geology has a good geologic description. [State of Utah]

**51.6 RESPONSE:** The comment is noted.

**51.7 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 51: DARK CANYON ISA COMPLEX (CONTINUED)**

**51.7 RESPONSE:** See the response to Specific Comment 39.16.

**51.8 COMMENT:** The statement on proprietary oil and gas industry information indicating a high potential is totally inconsistent with the lack of leases. The Middle Point area has been open to leasing and the main portion of Dark Canyon was open to leasing prior to withdrawal in 1970. Per the EIS, only one well was drilled in the 1970s on leases which were unexpired at that time. That does not indicate that the industry really thought the potential was high. Also, the EIS reports that a total of 15 test wells have been drilled in or near the WSA since 1956. Claims of high oil and gas potential which are not supported by active interest in leasing and exploration should not be considered. [John Veranth]

**51.8 RESPONSE:** The EIS identifies the oil and gas potential as low (f2).

**51.9 COMMENT:** Hunting of bighorn sheep in this ISA is nationally well known. BLM needs to add more about mountain lion and deer hunting which has historically been known as excellent in Dark Canyon. [Utah Wilderness Coalition]

**51.9 RESPONSE:** The presence of bighorn sheep is reported in the EIS. Neither deer hunting or mountain lion (cougar) hunting are known to be "excellent" in Dark Canyon. Most deer hunting occurs in Beef Basin, outside of the WSA. In the past, deer hunting in Herd Unit 31B (which includes Dark Canyon) was closed in the early 1980s due to low deer populations. It is now part of a limited entry buck-only area for which only 440 permits were issued in 1988.

**51.10 COMMENT:** Wilderness values on the mesa tops outside the canyons is not adequately considered in this wilderness study. These mesa tops form the critical forage areas for a majority of the game found in Dark Canyon. All other wildlife in this combined ecosystem are dependent on maintaining the natural habitat on these mesas. BLM recognizes these areas as critical habitat but did not include a majority of them within the wilderness recommendation. [Utah Wilderness Coalition]

**51.10 RESPONSE:** BLM's Proposed Action is for wilderness designation of all lands, including mesa tops, within the Dark Canyon ISA Complex.

**51.11 COMMENT:** Designated a primitive area by BLM, one of the few in Utah, this area had to be overwhelmingly special to attract special management. The seven major canyons have almost every special canyon wilderness value possible. Black bear and bighorn sheep are rarely found in other areas BLM is recommending for wilderness. The diversity of habitats in this one continuous wilderness area supports one of the most complete natural ecosystems in the State. [Utah Wilderness Coalition]

**51.11 RESPONSE:** The Dark Canyon ISA does have a wide range of wilderness and ecological values. It has very high wilderness qualities, along with several other WSAs in Utah which also have a wide range of values.

**51.12 COMMENT:** Many organizations plan trips each year (BLM's estimate of 4,308 visitor days is probably low), bringing a significant continuous source of income to the county. A majority of the trips, especially those of the Sierra Club, start in the Forest Service part of the canyon and are apparently not counted in this total. The estimates for \$20,000 of local income a year from this one area from backpackers appears a little low (less than \$5 per visitor day) but is still substantial. [Utah Wilderness Coalition]

**51.12 RESPONSE:** The number of visitor days are based on BLM records. The income figures are considered to be correct, as explained in the response to General Comment 24.8 and in the additional references cited in that response.

**51.13 COMMENT:** Since 1970, BLM has managed this area in basically the same manner that a wilderness area would be managed. Mining claims are not present within the ISA and all present leases carry the necessary wilderness protection stipulations. The real issue is what management problems in protecting wilderness values would occur in a nonwilderness recommendation. This issue is not addressed. [Utah Wilderness Coalition]

**51.13 RESPONSE:** The EIS information for the No Action/No Wilderness Alternative addresses the management expectations and impacts which would occur if Dark Canyon is not designated as wilderness.

**51.14 COMMENT:** Impact claims are exaggerated as reported by BLM. From March 24 to March 28, 1986, we explored the area and found no significant

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 51: DARK CANYON ISA COMPLEX (CONTINUED)**

human impacts. Areas checked in detail included: (1) Beef Basin, (2) Fable Valley, and (3) Young's Canyon. We also found that wilderness values in Sweet Alice Canyon were very understated, especially since it abuts the Forest Service's Ruin Canyon roadless area. [Sierra Club, Cache Group]

**51.14 RESPONSE:** The areas in question are outside of the Dark Canyon complex; and since they are no longer under consideration by BLM in the wilderness study, they are not analyzed in the EIS. See the response to General Comment 3.1.

**51.15 COMMENT:** The EIS should address the relationship and values of the ISA Complex and adjacent NPS and FS lands. [National Park Service; Sierra Club, Cache Group; and Jean Soko]

a. The Dark Canyon complex rivals any National Park land. What a wonderful opportunity now exists for the traveler from the aspen/spruce forests of the Abajo Mountains to the slickrock desert at the edge of Lake Powell!

b. The All Wilderness Alternative would complement proposed NPS wilderness areas in contiguous Canyonlands National Park. Desert bighorn sheep and cultural resources abound in the Dark Canyon ISA. These resources, as well as recreational opportunities, would benefit from wilderness designation.

c. Wilderness designation for Dark Canyon coincides with Natural Zone and recommended wilderness in the Glen Canyon General Management Plan.

d. This area has been very popular with backpackers for many years, especially since it was established as a primitive area. The entire Dark Canyon area should be established as a wilderness to complement recently designated National Forest wilderness in the upper canyons, and recommended National Park Service wilderness in the lower canyons. Wilderness designation as proposed by the Utah Wilderness Coalition will preserve the ecological diversity and continuity of the Dark Canyon area.

**51.15 RESPONSE:** The EIS explains the interrelationship of the National Forest wilderness area, BLM Dark Canyon complex, and the proposed NPS wilderness in Glen Canyon NRA.

**51.16 COMMENT:** Dark Canyon WSA is considered to have the highest wilderness-quality values for this

region. It appears to have very few significant conflicts. In fact, most of this area has been managed as a primitive area since 1970 and little or no conflicting uses have been allowed within the designated area. The only conflict is with future wildlife habitat treatment potential on 80 acres. Livestock would benefit if the wilderness boundary excluded the mesa tops. [State of Utah]

**51.16 RESPONSE:** There are no wildlife habitat treatments proposed. A seeding for livestock has been proposed. BLM believes that the wilderness values outweigh the limited conflicts with potential nonwilderness activities.

**51.17 COMMENT:** There are errors in the boundary maps that must be corrected. [Owen Severance and John Veranth]

a. The Pocket Map 1 is not correct in showing BLM's wilderness proposal. So far I have found seven WSAs that have the wilderness proposal shown incorrectly (3, 19, 20, 40, 42, 66, 72). However, that is a fairly minor problem compared to the maps in the text of Volumes II through VI. Two of the three WSAs that I have checked so far have the boundaries shown wrong on the map in the text; I visited the San Juan Resource Area Office to see the correct maps. In Volume V, the Grand Gulch map leaves out two cherry-stemmed "ways" in the Polly's Island area and the Dark Canyon map incorrectly shows the WSA boundary running down the bottom of Fable Valley instead of along the rim. At the San Juan Resource Area Office I was told that the "official" maps are located in each District Office. This creates a major problem for me: how can I find out the correct WSA boundary proposals without driving all over the State? I need accurate maps in order to be able to make intelligent comments on the EIS. Most of the maps in the SSAs were unreadable, so they aren't any help. How are you going to help me (and other interested people) get accurate maps? I would appreciate a reply as soon as possible since I have a lot of work ahead of me.

b. The WSA boundary in Fable Valley, Section 18, drops from the canyon rim to the floor and back. The boundary should follow terrain features. This should be corrected in the final agency recommendation.

**51.17 RESPONSE:** See the response to Specific Comment 46.38. The Dark Canyon map has been corrected to show the boundary on the canyon rim.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 51: DARK CANYON ISA COMPLEX (CONTINUED)**

**51.18 COMMENT:** Map 1: The lands shown as split-estate are Federal lands. The State mineral leases were relinquished on 11/26/84 (Patent 18648). [State of Utah]

**51.18 RESPONSE:** The map in the Final EIS has been corrected.

**SECTION 52**  
**BUTLER WASH WSA**

**52.1 COMMENT:** In the inventory, BLM incorrectly deleted the northern portion of Salt Creek from wilderness study. The naturalness of the area qualified this area for study as a wilderness area. The limited BLM resources available in the inventories has led to inaccurate information and then incorrect decisions on wilderness boundaries. In Butler Wash, BLM corrected one of these inventory mistakes. BLM also correctly assessed outstanding wilderness opportunities in this added portion on the southern part of this area. [Utah Wilderness Coalition]

**52.1 RESPONSE:** See the response to General Comment 3.1.

**52.2 COMMENT:** BLM excluded parts of Horse Park, Ruin Park, and Pappys Pasture from the WSA. These areas were dropped during the intensive inventory. BLM admits that 25,520 acres still appear generally natural, in spite of a short way in the northeast. The agency falsely established the wilderness study area excluding natural lands from study. This clearly violates the Inventory Policy. There is no evidence of any chaining or mechanical action in this area. The area has no evidence of human activities. BLM has not provided any rationale for the exclusion of these areas from the WSA. BLM needs to produce factual evidence validating their conclusion. Field work by our volunteers shows that BLM should include these areas in the study area and recommendation. We wish this new information to be considered in the wilderness analysis and that BLM add this area to the WSA. The boundaries involved are clearly shown on the maps provided with our proposal. [Utah Wilderness Coalition]

**52.2 RESPONSE:** The WSA boundary excluded a section of State land in the Ruin Park-Pappys Pasture area. This is consistent with inventory procedures to avoid including State sections which are along the

edges of the units which qualify for WSA status. Also, it is consistent with Department of the Interior policy. See the response to Specific Comment 26.2.

**52.3 COMMENT:** We thank BLM for recommending 24,190 acres in this area which is above the WSA size of 22,030 acres. This demonstrates that BLM can include lands in a wilderness proposal that are not in a WSA. We suggest that another 590 acres (total size 25,780 acres) be included as recommended by the Utah Wilderness Coalition in its Butler Wash proposal. The scenic qualities of this area match those found in nearby Canyonlands National Park. Wilderness designation will protect these qualities. BLM should remember that this area has received strong support in the past from citizens. [Sierra Club, Cache Group]

**52.3 RESPONSE:** BLM's Proposed Action in the Final EIS has not been changed. The inventory phase has been completed and it is not subject to further changes.

**52.4 COMMENT:** The addendum UT-060-169A page 24 has a discrepancy between the description and the acreage. The S1/2 of the NE1/4 of a section is 80 acres but the parcel is identified as 160.15 acres. Regardless, this isolated parcel plus the potential exchanged State land are an integral part of the area and should be included in the wilderness. [John Veranth]

**52.4 RESPONSE:** The description in the Draft was correct. The 160.15 acres is comprised of Lots 1 and 2, plus the S1/2 of the NE 1/4. Also, the area has been shown on Maps 1 and 2. The Final EIS analysis, the South Needles WSA as a separate unit, included as map reference area J in Volume V.

**52.5 COMMENT:** Geology in this area offers special opportunities not found in areas having more rain and plant cover. The erosion forming the multitude of fantastic stone forms in the Butler Wash area exposes for examination a long history of the earth. For the geologist, the story of the forming of the earth here is unique and for the new visitor the spectacular geologic scenery is unique. [Utah Wilderness Coalition]

**52.5 RESPONSE:** The EIS summarizes the geologic setting of the WSA.

**52.6 COMMENT:** Analysis of the effects of man's actions on plants will require a stable base for

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 52: BUTLER WASH WSA (CONTINUED)

measuring changes. Larger natural ecosystems form that base. Future range management, mining reclamation, intensive agriculture, and plant husbandry will benefit from scientific knowledge gained from these stable plant communities used as a base for analysis. Future genetic plant changes will need a pool of plants to draw from. Maintaining the diversity of this genetic pool is critical to maintain a library of resources for the future. Since no inventory of threatened or endangered plant species has been performed in this area, additional wilderness values may be discovered when these inventories are performed. Wilderness designations mandate the protection of a diverse natural plant community. [Utah Wilderness Coalition]

**52.6 RESPONSE:** The EIS describes the vegetation types found in the WSA. No threatened or endangered plant species are known to occur in the WSA. However, one Category 2 candidate species, Erigeron pachinensi, may occur in the WSA. The vegetation types are similar to other areas in the San Juan region.

**52.7 COMMENT:** The presence of mining claims either pre- or post-FLMPA are correctly assessed by BLM to not cause wilderness management problems in this area. Recent court decisions reinforce the management of leases (including those issued prior to 1976) in such areas to protect wilderness values. The stipulations placed upon leases and additional legal requirements necessary to protect wilderness values (such as archaeological sites, water resources, and endangered species for example) cause no management problem even on pre-FLMPA leases. [Utah Wilderness Coalition]

**52.7 RESPONSE:** There are no mining claims in the Butler Wash WSA. Consequently, any inherent management problems would not occur under the existing situation.

**52.8 COMMENT:** Mining of minerals and production of oil and gas requires the presence of deposits of commercial quantity. The DOE mineral resource evaluation began the first step in evaluation of nonwilderness development conflicts. That evaluation made estimates on the presence of those resources. The finding of that evaluation, which is supported by many other sources, was that no sizable deposit is likely to be present. If a deposit is found, the next step is to determine if it is of size, quality, and accessibility to be commercially extracted. Since the first hurdle

was not passed (mineral presence), the second hurdle could also not be passed. [Utah Wilderness Coalition]

**52.8 RESPONSE:** The information on minerals has been revised for the Final EIS, with lower potential than shown in the Draft EIS. There is little likelihood that mineral deposits exist or would be extracted from the WSA.

**52.9 COMMENT:** Oil and gas potential may indeed be low due to deep erosion in the area but there may be some undiscovered potential for tar sand deposits in the area; perhaps in the sandstones of the Cedar Mesa Formation. [State of Utah]

**52.9 RESPONSE:** The Cedar Mesa sandstone is the surface formation exposed in the Butler Wash WSA. No indications of tar sand accumulations have been recorded from within the WSA or to the west where the Cedar Mesa sandstone is highly faulted and exposed.

**52.10 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**52.10 RESPONSE:** See the response to Specific Comment 39.16.

**52.11 COMMENT:** This area is part of an ecosystem remote from most of man's intrusions. Butler Wash forms part of a larger area which supports bighorn sheep, deer, and perhaps other especially sensitive species. Wildlife in this area forms additional reasons for wilderness designation. Hunting, not mentioned by BLM, is also outstanding because of this area. This area contains critical deer habitat and hunting outside this area and within in the WSA benefits from wilderness management. Areas large enough to support large predators and sensitive large game animals such as Butler Wash and Canyonlands National Park are quite rare. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 52: BUTLER WASH WSA (CONTINUED)**

**52.11 RESPONSE:** Hunting is discussed in the EIS. Very little hunting use occurs in the WSA, and in some years the area is closed to hunting. There are no acres classified as crucial or as Federally designated critical habitat in the WSA.

**52.12 COMMENT:** While I agree with the evaluation of wilderness values, I disagree with the visual resource inventory. Classifying 43 percent of the WSA as Class C scenic quality and 52 percent of the WSA as VRM Class IV is ridiculous. The claim that the area with Class C scenic quality "is typified by low rolling land-forms with little relief" is not correct. The area in question has elevation differences of over 1,200 feet, including canyons that are 800 feet deep. Because of the "high buttes and sandstone domes" that provide the backdrop for the "relatively flat, open parks," there is no Class C scenic quality area and the lowest VRM classification should be Class III. The addition of the acreage in the Upper East Fork of Salt Creek adds outstanding wilderness area to the proposal. [Owen Severance]

**52.12 RESPONSE:** The visual resource information in the EIS is based on BLM guidelines using the criteria set forth in the BLM Visual Resource Management System. Scenic Class C and VRM Class IV do not necessarily mean that scenic attributes do not exist. However, in 1986, BLM reevaluated the VRM inventory as part of the preparation of the San Juan RMP. Subsequently, the sensitivity rating for the Beef Basin area has been upgraded from low to high. This in turn has resulted in a revision of the VRM Class from IV to III. The acreages for the WSA have been revised in the Final EIS as follows: Class II - 57 percent, Class III - 43 percent.

**52.13 COMMENT:** Archaeology may be the biggest value of this area. More than any area in the United States, this area stores prehistory in a large number of archaeological sites. "No significant archaeological work has been conducted in Butler Wash area," states the SSA. In the past the area has been sampled for archaeological sites. If the finding from those sites are a representative indication of the density of archaeological sites in this area, Butler Wash may have approximately 30 sites. Physical geography indicates that this area forms a border between pre-history hunting areas and Indian agricultural areas. Sites are not often evenly distributed and because of the transition character of this region, predictions are not now well established. [Utah Wilderness Coalition]

**52.13 RESPONSE:** The EIS estimates that up to 860 sites could be discovered in the WSA. Site densities are expected to be lower here than in other portions of the San Juan region.

**52.14 COMMENT:** We request the following information concerning Butler Wash: endangered and threatened species inventory, archaeological inventory, and analysis of status of intrusions nearby Bobby's Hole and Salt Creek. [Utah Wilderness Coalition]

**52.14 RESPONSE:** Current information on endangered and threatened species, archaeological inventory, and intrusions are summarized in the Final EIS. See the responses to General Comments 9.6, 13.8, 16.3, and 20.2.

**52.15 COMMENT:** Recreation is correctly assessed by BLM as outstanding in this area. Hiking and camping in the rugged washes and mazes of slickrock canyons are among some of the best. Beyond recreation, other wilderness activities are equally important and their importance not well identified. Scientific study of wildlife, archaeology, and botany are especially important in this area. [Utah Wilderness Coalition]

**52.15 RESPONSE:** Opportunities for recreation and scientific study are noted in the EIS.

**52.16 COMMENT:** Management of grazing, hunting, and recreation activities offers no conflicts since adequate access for any required vehicles is limited to present routes or allowed by wilderness management in emergencies. [Utah Wilderness Coalition]

**52.16 RESPONSE:** The EIS does not identify these items as conflicts.

**52.17 COMMENT:** This area qualifies for wilderness designation because it possesses wilderness character, there are no significant nonwilderness development conflicts, and there are no management restraints precluding wilderness designation. [Utah Wilderness Coalition]

**52.17 RESPONSE:** BLM's Proposed Action is the All Wilderness Alternative, as modified with the Salt Creek variation. This results in a Proposed Action of 24,190 acres.

**52.18 COMMENT:** There was at one point a portion of a section which was to be proposed as a wilderness

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 52: BUTLER WASH WSA (CONTINUED)

addendum to the Butler Wash package. Eventually, with State land exchange, the full section could be included as wilderness, thus, preventing a small parcel of nonwilderness surrounded by BLM/NPS wilderness. For proper management, we believe it is important that the Butler Wash boundary be contiguous with the Canyonlands National Park boundary for the full distance.

A variation to add upper East Fork and Salt Creek (2,160 acres) to the WSA is desirable. The NPS expressed support of this addition in correspondence to BLM in 1980 during the intensive inventory phase. The addition follows natural boundaries and combined with the proposed variation would enhance recreation and facilitate management of visitors and cultural resources protection. [National Park Service]

**52.18 RESPONSE:** BLM has included the 160.15 acres (South Needles WSA) described in the Draft EIS addendum and the Salt Creek variation in the Proposed Action, as listed in Volume I.

**52.19 COMMENT:** We question whether the estimated increase to 4,939 visitor days per year is realistic. Upper Salt, already publicized as part of Canyonlands National Park, in 1985 had only 1,598 people who stayed an average of 2.6 nights in the area. The absence of water in the Butler Wash unit would limit human use and causes us to question the EIS's predictions. [National Park Service]

**52.19 RESPONSE:** The narrative states that the visitor use could be as much as 4,838 visitor days per year. This is a long-term projection, which may or may not be met by actual use. BLM considers it to be realistic, although uncertain.

**52.20 COMMENT:** BLM correctly correlated the wilderness values and those of the adjacent National Park wilderness recommendation together in making this recommendation. [Utah Wilderness Coalition]

**52.20 RESPONSE:** The EIS notes where BLM wilderness alternatives would complement similar management objectives on adjacent lands administered by the National Park Service.

**52.21 COMMENT:** Compared to other units in the region, Butler Wash WSA has high wilderness-quality values and low conflicts. There are low mineral and energy conflicts. High wilderness values would complement similar values in the adjacent Canyonlands

National Park. The proposed 24190-acre All Wilderness Alternative could impact management of the critical or high-priority winter deer range. If Beef Basin and Ruin Park are outside the WSA boundary, there will be minor impacts to livestock. There is also a potential conflict with the development of groundwater in the deep bedrock aquifer. [State of Utah]

**52.21 RESPONSE:** Wilderness designation would have little, if any, effect on livestock and wildlife because only a small portion of the sagebrush parks in Beef Basin would be within the wilderness area. There are no acres classified as crucial or as Federally designated critical habitat in the WSA. Likewise, there would be not conflict with water resources since no groundwater development proposals are anticipated.

## SECTION 53

### BRIDGER JACK MESA WSA

**53.1 COMMENT:** BLM should correct errors made during the wilderness inventory. [Utah Wilderness Coalition]

a. In the intensive inventory BLM dropped Six Shooter Peak. BLM admitted the area was of adequate size and naturalness. BLM concluded the solitude and recreation potential was inadequate. BLM limited determination of solitude to the confinement criteria ruled invalid by IBLA decisions. Other factors including the vastness of the area, its relationship to the whole roadless area of more than 100,000 acres, and importance of vistas in assessing wilderness were not considered as required. BLM confused recreation and solitude. They applied the screening criterion for recreation which is not a valid tool. BLM failed to consider the wilderness activities associated with the supplemental values. Those values include some of the regions more important archaeological sites, photography, and these values as associated to the abutting national park. BLM also used the presence of natural State lands to assess solitude. IBLA ruled this method invalid and remanded areas where they used this criterion.

b. Bridger Jack Mesa is separated from lands in Canyonlands National Park recommended for wilderness at the one point by one-fourth mile. Between Bridger Jack Mesa and the park lies Lavender Canyon.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 53: BRIDGER JACK MESA WSA (CONTINUED)**

In the initial inventory BLM incorrectly used a rugged jeep path in the bottom of Lavender Canyon to divide Bridger Jack from a larger wilderness area including Lavender Canyon. BLM wilderness inventory units are required to be bounded by roads or non-BLM lands. Field work by volunteers coupled with BLM's record verify that no road exists as indicated by BLM in the initial inventory. In the initial inventory BLM further reduced the size of Bridger Jack by removing all of the scenic cliffs (about 2,600 acres) alleging that mining activity impacted this area. Field investigation has established that only a small fraction of that area dropped has any intrusions within it.

c. The middle area, Little Bridger Jack Mesa, was dropped in the initial inventory, supposedly due to new intrusions identified in public comments. The impacts described in the public comments had all been listed in the inventory document. The impacts listed in the public comments were not new. BLM failed to field check the impact described in the comments to determine if they were significant as required in the procedure. The air strip occupies less than 20 acres on the very northern boundary. The road described is impassable, reclaimed, and not a significant impact. That impact covers less than 13 acres. BLM failed to consider a boundary change to exclude the impacts. This is one more violation of the inventory process.

d. In the initial inventory, BLM moved the boundary from the boundary road on Bridger Jack Mesa to the top of the mesa. Their argument was that public comments against the original proposal identified intrusions such as an active mine, drilling exploration, roads, and seeding. Those comments gave no information on their location within the unit and the degree that they impacted the wilderness character of the unit. BLM failed to field check those comments as required in the inventory process. Our field checking found that BLM did not learn any new information on these impacts; they were already known and considered. BLM had determined that they were excluded from the wilderness proposal already. The mesa sides are without significant impacts and should be included in the study area.

**53.1 RESPONSE:** See the response to Specific Comment 3.1.

**53.2 COMMENT:** In the earlier part of the wilderness study, BLM recommended nonwilderness for Bridger Jack Mesa, the only remaining part of a larger roadless area still in the wilderness review. BLM

has reversed this recommendation supporting wilderness. This simply argues for wilderness in the entire area. Missing is analysis for opportunities for scientific study (the main reason for designation as an outstanding natural area), for photographs of scenic vistas, and for day hikes. Each of these is outstanding. [Utah Wilderness Coalition]

**53.2 RESPONSE:** Bridger Jack Mesa is proposed for wilderness designation. The EIS notes the opportunities for scientific study, photography, and hiking.

**53.3 COMMENT:** Davis and Lavender Canyons should be added to the Bridger Jack Mesa WSA. [Utah Wilderness Coalition and Richard Christie]

a. Between Little Bridger Jack Mesa and Six Shooter Peak, is a vehicle way which travels solely in the bottom of a sandy wash. This is sometimes used by ORV users. There is no evidence of any construction or maintenance. It is not shown on the maintained road system for the county for BLM roads. This clearly is a way which is not a significant impact.

b. The alleged "roads," e.g., that which supposedly separates Bridger Jack Mesa from the top of Lavender Canyon, have eroded into impassability to my four-wheel ATV and are revegetating to the point that I could not follow them on foot for significant segments. Areas adjacent to the WSA clearly meet wilderness criteria. I surmise that the Davis and Lavender Canyon areas were not studied for wilderness qualities because Davis Canyon was, at the time, an active candidate for the site of a nuclear waste repository and wilderness study status of areas behind the repository would have intensified dispute over the suitability of the site. At any rate, a valid reason for excluding these areas from study, or from wilderness designation, is not evident from inspection on site.

**53.3 RESPONSE:** During the inventory, BLM determined that the vehicle route was a significant intrusion which adversely impacted the suitability for WSA status. The inventory phase has been completed. See the responses to General Comments 3.1 and 4.1.

**53.4 COMMENT:** Since the Department of Energy has for all practical purposes abandoned its plans for an atomic waste repository in this region (apparently one of BLM's main contentions in eliminating these canyons from further study), and one of our Utah

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 53: BRIDGER JACK MESA WSA (CONTINUED)**

congressmen introduced legislation to add lower Davis and Lavender Canyons to Canyonlands National Park, it would seem a logical progression for BLM to reinstate these areas for wilderness designation. This would make Bridger Jack WSA contiguous with Canyonlands National Park as it should be. As presently proposed, what kind of logical land management would result with a narrow finger of BLM land poking in between Canyonlands National Park and Bridger Jack wilderness, i.e., Dry Fork Canyon? [Michael Salamanca]

**53.4 RESPONSE:** The potential repository was not a factor in the wilderness inventory or in the subsequent wilderness study. Also, see the response to General Comment 3.1 concerning BLM's policy on reinventing public lands.

**53.5 COMMENT:** The mesa's vegetative communities are being monitored as ungrazed ecosystems. For this and other reasons, BLM recommends this area be designated an outstanding natural area (ONA). After proclaiming the natural values of this area, BLM claims that nonwilderness management is adequate to protect these values. The ONA management was not discussed in the SSA. The document stated that this discussion was "not applicable." Present mineral management policy in nonwilderness lands gives dominant priority to mineral development. No management policy other than the wilderness management policy offers the multiple use benefits wilderness designation offers. BLM needs to address this issue in the EIS. [Utah Wilderness Coalition]

**53.5 RESPONSE:** BLM's Proposed Action in the EIS is for wilderness designation of Bridger Jack Mesa. However, the mesa is designated as an ACEC in the San Juan Resource Management Plan. ACEC management would protect natural vegetative values regardless of wilderness designation or nondesignation.

**53.6 COMMENT:** We agree that mineral potential is low. Recent drilling further validates the minimal possibility for oil in this area. Uranium exploration, most of it not disturbing the area, has been fairly extensive. The Chinle Formation is exposed along the area's cliff faces and this led to uranium speculation in this area. Uranium in this formation is of commercial value only when concentrated. Because of the nature of the Chinle Formation in this area (inadequate permeation prevented concentration) and extensive exploration, commercial grade uranium is highly unlikely to

be found in the Bridger Jack Mesa area. [Utah Wilderness Coalition]

**53.6 RESPONSE:** BLM's data does not agree with the comment. There are small uranium mines just outside the boundaries of the WSA in the Indian Creek mining district. The WSA has favorability for small deposits of uranium (f2) with a moderate degree of certainty (c3) and exploration for and/or development of uranium is projected for the WSA.

**53.7 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**53.7 RESPONSE:** See the response to Specific Comment 39.16.

**53.8 COMMENT:** The No Action/No Wilderness Alternative narrative states that there are 20 mining claims in the WSA occupying 60 acres. Is the 60 acres just the portion of the mining claims that overlap the WSA boundary? Twenty mining claims would normally include more than 60 acres. Including the location of the mining claims on the maps used in the narrative, would better illustrate the impacts and make the narrative clearer. [Mining interests]

**53.8 RESPONSE:** The mining claims overlap the WSA boundary, therefore only parts of the claims are included in the acreage. Generally, the claims are along the cliff edges on both sides of the WSA. A map would add little to the usefulness or significance of the information. The Final EIS has the updated figure of 68 claims on 1,360 acres in the WSA.

**53.9 COMMENT:** The section on Uranium and Associated Minerals confuses uranium host sands and ore deposits. Also the significance of no uranium production within the WSA while uranium production has occurred adjacent to the WSA is exaggerated. Activity at outcrops prior to subsurface investigation is to be expected. Since the same formation that is productive

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 53: BRIDGER JACK MESA WSA (CONTINUED)**

on the flanks of Bridger Jack Mesa underlie the WSA, it must be assumed that the lack of known deposits in the WSA may simply reflect a lack of adequate exploration. [State of Utah]

**53.9 RESPONSE:** The text on uranium has been revised for the Final EIS and exploration for and/or development of uranium is projected.

**53.10 COMMENT:** This WSA has greater value as a Research Natural Area (RNA) as proposed in the Draft RMP for the San Juan Resource Area than as a wilderness area. If it is designated as wilderness, the number of visitors will greatly increase, creating severe negative impacts on the vegetative communities that the RNA designation is recognizing and trying to protect. [Owen Severance]

**53.10 RESPONSE:** Visitor use currently is less than 100 visitor days per year. Due to the site characteristics and steep access, the WSA is not expected to receive significant increases in visitor use after wilderness designation! In addition, impacts would be monitored and visitation limited if vegetation were affected. Consequently, severe negative impacts to vegetation would not occur.

**53.11 COMMENT:** Further inventories for endangered and threatened species are needed. [Sierra Club, Cache Group, and Utah Wilderness Coalition]

a. This WSA should be included as a part of the Utah Wilderness Coalition's Six Shooter Peak wilderness proposal of 32,640 acres so that the entire ecosystem can be best protected. The WSA has a very important relic plant community. Important raptor nesting sites are found here. BLM should complete a detailed inventory for threatened and endangered species found here.

b. The prominence this mesa plays in the area gives high probability for the occurrence of raptor nesting sites. No inventory for threatened and endangered species has been conducted.

**53.11 RESPONSE:** Special inventories for threatened and endangered species are not required for the EIS. See the responses to General Comments 9.6 and 16.3.

Coordination with the Fish and Wildlife Service has been carried out, consistent with the Endangered Species Act. That agency has not identified any threat-

ened or endangered species in the WSA. On-site inventory and clearances would be done prior to surface disturbance in the area. The EIS analysis assumption scenario indicates that up to 17 acres in the WSA may be disturbed by locatable mineral activities under the No Action/No Wilderness Alternative.

**53.12 COMMENT:** Under visual resources, Bridger Jack is assigned in its entirety a VRM Class IV rating. Why? This is the maximum modification criteria; the WSA area itself should be Class II at the least. [Michael Salamacha]

**53.12 RESPONSE:** Based on the three visual resource inventory factors of scenic quality, visual sensitivity, and distance zone, Bridger Jack Mesa was evaluated in 1980 as VRM Class IV. This is primarily due to the latter two factors. Since the original VRM determinations, BLM has reviewed the management objectives for the area and intends to apply the VRM Class I standards under the San Juan RMP (currently under protest).

**53.13 COMMENT:** Because of the unusually high density of archaeological sites here (it may rank among the highest in the United States), surveys, if conducted, will find additional sites beyond the three that are now recorded. Some of the finest rock art in the country is found in Lavender Canyon, a natural part of this area. [Utah Wilderness Coalition]

**53.13 RESPONSE:** The EIS indicates that up to 125 sites could be found in the WSA. Site densities are expected to be lower here than in other portions of the San Juan region.

**53.14 COMMENT:** BLM's assessment of opportunities for solitude and primitive recreation is not correct. [Sierra Club, Cache Group, and Utah Wilderness Coalition]

a. BLM incorrectly assessed the opportunity for solitude. Their criteria is incorrectly limited to areas possessing vegetative and topographic screening. Other values need to be considered. Even the limited criteria are misapplied. As BLM's photographic file on this area shows, the top of the mesa is covered by a dense juniper forest and undulating terrain. BLM offers no documented methods describing required sighting distances and user density to support their conclusion. Even so, many could visit this area without being aware of others. BLM's conclusion of minimal

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 53: BRIDGER JACK MESA WSA (CONTINUED)**

wilderness values is not supported by their record and evidence gathered by our volunteers.

b. We disagree with BLM's assessment that the area has no wilderness grade-solitude and outdoor primitive recreational opportunities. Bridger Jack Mesa has outstanding wilderness opportunities for recreation, solitude, and naturalness. This area has been proposed as an addition to Canyonlands National Park on several occasions. Any area that is proposed to be National Park land must surely have outstanding qualities that far outweigh any potential development. BLM should remember that in its SSA, it recommended this area as a candidate Outstanding Natural Area. This alone should help qualify the complete area as a wilderness candidate.

**53.14 RESPONSE:** Configuration, vegetative and topographic screening, and the number of visitors were considered in the evaluation of solitude. The EIS states that all 5,290 acres of the WSA meet the criteria for outstanding solitude. The EIS does not contain the conclusion of minimal wilderness values, as it states just the opposite with all 5,290 meeting the naturalness and primitive recreation criteria in addition to solitude. This information is in both Draft and Final EIS documents.

**53.15 COMMENT:** Bridger Jack Mesa offers outstanding opportunities for solitude. It is also an exceptional natural area representing pinyon juniper woodland as Van Pelt (1978) has documented. Roads are visible only from the very edge of the mesa, and noise from passing cars does not carry to the top. Magnificent views into Lavender Canyon provide a reason to reconsider wilderness designation for this canyon. Management of wilderness values would be simplified if the following sections were included in the WSA: T. 32 S., R. 2 E., secs. 7, 18, and 19; and T. 32 S., R. 20 E., secs. 24 and 25. These sections possess outstanding scenic quality and wilderness values. There are absolutely no developments or ways in these additional sections. They would form a continuous wilderness unit with compatible management objectives between Bridger Jack and Canyonlands National Park. This would eliminate the nonwilderness area between two proposed wilderness units which could potentially be developed and thereby degrade the wilderness resources and values in both. [National Park Service]

**53.15 RESPONSE:** See the responses to General Comment 3.1 and Specific Comments 53.3 and 53.14.

**53.16 COMMENT:** Bridger Jack Mesa WSA has moderate wilderness values and the lowest degree of conflict in the region. There are no conflicts of major significance with the recommended 5,290-acre All Wilderness Alternative. A potential conflict is possible with future habitat management for wildlife. [State of Utah]

**53.16 RESPONSE:** Potential conflicts with locatable minerals could occur on existing mining claims, if valid, on up to 1,360 acres. No conflict with wildlife management would occur, since no wildlife habitat developments are proposed within the WSA.

**SECTION 54**  
**INDIAN CREEK WSA**

**54.1 COMMENT:** The wilderness inventory for the Indian Creek WSA eliminated lands that qualify for wilderness. [Owen Severance, National Park Service, and Utah Wilderness Coalition]

a. The Indian Creek WSA has a very strange history as a WSA. The Initial Wilderness Inventory proposal in April 1979 recommended 30,580 acres for intensive inventory. Five comments were received from the public, two in favor of the proposal and three against. As a result of these comments, in August 1979, the entire area was dropped "because of loss of natural quality." This decision was protested to the State Director by three persons. In October 1979, the State Director reinstated 7,300 acres of the Inventory unit. These 7,300 acres have survived the intensive inventory and have become the WSA (with the acreage recalculated at 6,870 acres). No reasons or explanations have been given for proposing just 6,870 acres and giving that area a completely unmanageable boundary (following section lines). The proposal leaves out more area that meets the wilderness criteria than it includes. There are few conflicts in my proposal. Oil and gas favorability is low; potash has a moderate favorability; and uranium and vanadium have a moderate favorability. It is doubtful if any deposits of potash or uranium and vanadium could be mined economically. The proposed wilderness area is composed of highly eroded canyon systems with unusual rock formations and rich color contrasts. The area remains in a natural condition due to its inaccessibility. The opportunities for solitude are outstanding because the area is isolated from off-site intrusions and influences. The steep-walled,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 54: INDIAN CREEK WSA (CONTINUED)**

narrow canyon provides outstanding opportunities for backpacking and associated activities. All of my proposal meets all of the requirements for wilderness designation and it should become the Proposed Action. It provides a very manageable boundary and also includes more of the spectacular Indian Creek drainage.

b. In the initial inventory, the BLM proposed the whole 30,500 acres be placed in the intensive inventory for further wilderness consideration. The final decision on the initial inventory reversed this recommendation and the BLM concluded that this area clearly and obviously lacked wilderness character. Part of the unit was placed into the intensive inventory (7,300 acres). The difference in acreage from the present 6,870 acres is not explained in the Draft EIS. We request an explanation for the acreage difference. The record and the physical evidence fail to support the deletion of large natural areas in this roadless area. BLM now has the opportunity to recognize these inventory errors and correct them by studying all of the natural part of Indian Creek for designation as wilderness.

c. The Indian Creek unit could be much larger. Horse Thief Canyon and the upper portions of the Indian Creek drainage meet the criteria for wilderness and should be included to complement adjacent NPS wilderness. More than 10,000 acres in an untrammeled condition should be added to the proposed Indian Creek WSA. These additional acres are Secs. 28, 29, 32, 33, and the E1/2 of Sec. 21, T. 28 S., R. 20 E.; Secs. 4, 5, 8, 9, 17, 32, 33, and the N1/2 of Sec. 20, NW 1/4, E 1/2 Sec. 21, and NE 1/4 S 1/2 Sec. 28, T. 29 S., R. 20 E.; in T. 29 1/2 S., R. 20 E., Secs. 32, 33, 34, 35; and a portion of Secs. 4, 5, and 6 in T. 30 S., R. 20 E.

**54.1 RESPONSE:** See the response to General Comment 3.1.

**54.2 COMMENT:** BLM should redraw the boundary lines. [Owen Severance, Rodney Greeno, and John B. Norton]

a. The best way to define WSA boundaries would be to use topographic features where possible and use section lines only where there aren't any clearly defined topographic features. In the EIS, topographic boundaries are mainly used to reduce the area of WSAs from their sizes in the initial inventory. Examples are: the Spencer Flats area in the North Escalante Canyons/The Gulch ISA Partial Wilderness Alter-

native and the Road Canyon WSA Partial Wilderness Alternative. Examples of WSAs where topographic boundaries could have been used to enlarge the WSAs but weren't are: North Stansbury Mountains WSA, the Deep Creek Mountains WSA, and the Indian Creek WSA.

b. BLM's all wilderness recommendation protects part of this area, but needs to be expanded to the edge of naturalness. The current straight-line boundary is indefensible--bearing no relationship to wilderness values on the ground.

c. I urge BLM to draw its boundaries along natural geographic lines, not existing mineral claim lines.

**54.2 RESPONSE:** See the response to General Comment 3.43.

**54.3 COMMENT:** The WSA is much too small and should be extended to include the country upstream along Indian Creek, as well as to the north along Butler and Horse Thief Canyons. Especially when seen from the canyon rim viewpoints administered by BLM, this entire area is perceived as being a part of Canyonlands National Park, and forms a vital foreground and middleground view. [Henry Wright]

**54.3 RESPONSE:** The area between the Indian Creek WSA and the Needles Overlook has several intrusions (roads and airstrip) which disqualified it from becoming part of the WSA.

**54.4 COMMENT:** BLM's proposal is unmanageable. The boundaries should be taken to the nearest roads. The proposed Draft EIS boundaries cut across canyons in very unnatural and illogical locations. There is no rationale unless BLM is trying to preserve a few mining claims. When one looks across these straight lines, it is hard to tell what BLM calls wilderness and what is not wilderness. If the proposed Draft EIS lines are accepted for Indian Creek, then there will be significant management problems from illegal ORV abuse. It will be difficult for the ORV users to distinguish the actual boundaries. This WSA and the surrounding lands in the UWC's proposal are identical in all respects to land in adjacent Canyonlands National Park. [Sierra Club, Cache Group]

**54.4 RESPONSE:** BLM has determined that the WSA would be manageable as wilderness. See the responses to General Comments 3.43 and 9.14.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 54: INDIAN CREEK WSA (CONTINUED)**

**54.5 COMMENT:** The boundaries of the Indian Creek WSA are illogical. [Sierra Club, Cache Group; Scott Delong; and Louise Noyes]

a. We hiked in the Indian Creek WSA. What an awesome wild place. We had 1 day to spend there but felt that it could have taken weeks to adequately explore all the convolutions of the area. What a challenge. We were incredulous when we learned that the BLM had only recommended a mere 6,870 of those magnificent acres for wilderness protection. BLM's MFP for this area found an area over three times this size to be "free of the evidence of man." We feel the Indian Creek wilderness area boundaries should include the natural extent of the area - using the existing roads and including the tributary drainages. This acreage is the same as the adjacent proposed wilderness within the National Park. The proposed boundaries of this wilderness area are awkward, arbitrary, unnatural and suspicious. They just don't make sense. All of this special remote unit deserves the full protection that only wilderness designation offers, and we endorse the Utah Wilderness Coalition's proposal for a 26,920-acre wilderness area at Indian Creek.

b. BLM's Draft EIS recommendation for a 6,870 acre Indian Creek wilderness area is very poor. It appears to involve many arbitrary straight boundary lines which will only create major management problems. To complete this area's natural integrity and preserve its wilderness qualities, BLM should endorse the Utah Wilderness Coalition's 26,920-acre proposal.

c. Your proposal severs many of the most spectacular canyon systems. Any Indian Creek wilderness should include all of the natural extent of Indian Creek and its tributary drainages, as well as Rustler Canyon and Horse Thief Canyon. This area richly deserves to be protected in its natural state. Wilderness designation is perfect because it preserves a semblance of multiple use (recreation, grazing, wildlife protection, etc.), while still preserving the land.

**54.5 RESPONSE:** See the responses to General Comments 3.1 and 3.43.

**54.6 COMMENT:** BLM is correct that management of mining claims within designated wilderness areas is possible. Additional legal authority to protect wilderness values of areas under mining claim is specifi-

cally covered in the Wilderness Act. [Utah Wilderness Coalition]

**54.6 RESPONSE:** Valid mining claims located prior to October 1976 do have pre-existing rights which may degrade wilderness values. See the response to General Comment 1.13.

**54.7 COMMENT:** This area, as well as all the eastern half of the State, possesses potash. Ample supplies of this mineral can be found outside this area. It is possible to extract this mineral within the wilderness area using underground mining techniques, such as solution mining. Uranium deposits occur in small concentrations. Exploration to identify these small deposits just a few feet wide quickly costs more than the limited mineral deposit value. Unless the commercial concentration can be found on the surface, economic development of this mineral in this area is highly unlikely. The decreasing demand for uranium appears to be headed permanently downward for many persistent political and economic reasons. Ample supplies of uranium are available in areas outside this roadless area for the remaining future of the industry it serves. [Utah Wilderness Coalition]

**54.7 RESPONSE:** BLM does not concur that potash mining would be feasible from outside the WSA. Solution mining requires a number of wells be drilled above the ore body for the purpose of injecting fresh water and extracting brine. In addition, potash mining would not be allowed with the All Wilderness Alternative because, under current rules, potash leases would not be issued within wilderness areas. In the Final EIS, the favorability rating of uranium has been adjusted downward (from f3 in the Draft EIS) to f2, based on reconsideration of the information that deposits would be small and isolated.

**54.8 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. Ten of the proposed WSA areas in San Juan County, Utah, numbered 45 through 54 on the Draft EIS pocket map, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic age rocks. These areas are situated along the southwest flank of the Pennsylvania age Paradox sedimentary basin. The areas are relatively unexplored and only a few test wells have penetrated Paleozoic age rocks. [Texaco, Inc.]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 54: INDIAN CREEK WSA (CONTINUED)**

**54.8 RESPONSE:** Even though hydrocarbon exploration around the WSA has been sparse, the overall geologic characteristics of the WSA indicate a low favorability for oil and gas fields. The potential for Pennsylvanian fields is believed to be low because of the WSA's position in the Paradox Basin, which would be in a hypersaline facies. No algal mounds (which is where production is found on the southwestern flank of the basin) formed here, and there appears to be no structural development, which is the key to Pennsylvanian production north of the WSA. The Mississippian potential also is believed to be low due to the lack of structural development.

**54.9 COMMENT:** Successful discovery of large scale, economic sandstone uranium deposits in the Cutler Formation is not very probable based on geologic factors. [State of Utah]

**54.9 RESPONSE:** The EIS indicates that deposits found in the Cutler Formation are localized and small, and that production elsewhere from this formation is limited.

**54.10 COMMENT:** Grazing should be eliminated from this WSA--it certainly would not result in the rancher going broke because of losing 39 AUMs (grazing for 17 cattle) for a couple of months of the year. The land itself is not suited for grazing, there is not enough vegetation available, so why continue, especially when so few cows are involved. [Michael Salamacha]

**54.10 RESPONSE:** See the response to Specific Comment 46.17.

**54.11 COMMENT:** Wilderness designation will best protect cultural resources in the Indian Creek WSA. [Sierra Club, Cache Group, and Utah Wilderness Coalition]

a. It is the origin of that name that gives this area extra special value. Along the sides of the creek are found a high number of Indian sites both within and beyond the present recommendation. Upstream inside the roadless area but outside the wilderness recommendation are found several recorded sites including the important Pinnacle Village site. An interesting historic site just upstream displays a fire kiln and weathered timbers transported into the area by wagon in the early decades of this century. This was an old oil derrick and is of important historic value. Recently, Archaeologist Steve Manning has performed an inven-

tory of cultural values within Indian Creek. Steve indicated that more sites are found just upstream within the roadless area but outside the wilderness recommended area than are found within the recommended area. Some of the finest rock art panels are found in Indian Creek. Protection of these panels is best carried out in wilderness areas. The management of vehicle access plays a significant role in reducing damage to archaeological resources. Wilderness mandates this protection. If the area is not designated wilderness, BLM is most likely to leave this area open for all ORV use.

b. Remarkable Indian ruins are present in this WSA. Wilderness designation will help protect these cultural resources. This includes several fine rock art panels and the important Pinnacle Village site. This WSA also has a historic fire kiln.

**54.11 RESPONSE:** The cultural resources narrative in the Final EIS has been revised to better reflect the important values. The Pinnacle Village site, historic fire kiln, and the oil derrick are all outside of the WSA. Available information indicates that three alcoves located in the WSA may contain rock art panels, as well as other cultural resources. Also, see the response to Specific Comment 47.35.

**54.12 COMMENT:** The WSA is considered to have excellent hiking opportunities, especially where the Hurrah Road crosses Indian Creek. [Sierra Club, Cache Group]

**54.12 RESPONSE:** The location mentioned is not within the WSA.

**54.13 COMMENT:** The history of this area with various Federal agencies shows that Indian Creek does have unique qualities. Note the following events: (1) Indian Creek was proposed for inclusion in Canyonlands National Park in 1962, and (2) It was proposed by BLM as a primitive area with 30,000 acres in 1976. [Sierra Club, Cache Group]

**54.13 RESPONSE:** The qualities of the WSA are described in the EIS. Past management proposals have little relationship to the wilderness criteria and wilderness characteristics of the areas.

**54.14 COMMENT:** The Indian Creek WSA is important to the use of Canyonlands National Park. [National Park Service and Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 54: INDIAN CREEK WSA (CONTINUED)**

a. The precipitation averages do not agree with the most recent data from the Needles district. The questionable data are in paragraph six, page 1 of the Indian Creek WSA section of the EIS. The attached records show that February and June have the least precipitation and July and August have the most. The availability of year-round water makes the area an ideal hiking destination even in summer. Hikers have suggested that the NPS establish a trail from parkland to Indian Creek and are very supportive of establishing a wilderness area around Indian Creek.

b. Indian Creek WSA is an important unit contiguous with Canyonlands National Park and is especially desirable for the protection of Indian Creek features near the park boundary. This is a popular spot for river runners to hike into from the Colorado River.

c. The importance of this area to the adjacent National Park is mentioned. It is believed that this canyon was the route of the first European exploration expedition into this area. Many in the future will also see this area offering access to the National Park for those who seek a fuller experience than can be seen through the windshield of a car.

**54.14 RESPONSE:** The climate data in the EIS have been updated. The EIS notes that boaters on the Colorado River occasionally hike up Indian Creek from the National Park to the WSA. It also notes that several pour-offs and steep canyon terrain make hiking a challenge in those locations.

**54.15 COMMENT:** If BLM does not designate these areas, there are many people in this country who will see to it that it is removed from your jurisdiction and added to Canyonlands National Park. I sincerely hope that your agency has the vision and foresight needed to protect this area from the selfish political and business interests that would despoil it. I formally request that this letter be included in the official record. [Scott Delong]

**54.15 RESPONSE:** BLM does not designate wilderness areas. As explained in the EIS, only Congress can designate wilderness areas as part of the National Wilderness Preservation System. The letter is included as part of the EIS file record.

**54.16 COMMENT:** BLM's wilderness proposal is not consistent with previous BLM planning. [Terry

Martin, NPCA; Sierra Club, Cache Group; Scott Delong; and Wayne Ranney]

a. In 1976, your own agency's regional land use plan recommended that this entire area be set aside as a "primitive area." Intense political pressure was then applied to change this recommendation. BLM folded under this pressure. When the bureau finished the wilderness scoping process you claimed that this area "clearly and obviously" lacked wilderness characteristics! Only after you lost a formal wilderness appeal did you include a remnant of this area as a WSA. I realize the pressures that are put upon you to minimize wilderness acreage but I wish that you would just stick to doing your jobs as the law dictates. How can you claim that the area lacks wilderness values when you earlier recommended the area as a primitive area and when your own Indian Creek-Dry Valley Management Framework Plan found more than 22,000 acres surrounding Indian Creek to be natural and "free of the evidence of man"?

b. Indian Creek near Canyonlands National Park should be protected as a 26,920-acre complement to the NPS proposal. Your own Indian Creek-Dry Valley MFP found 22,000 acres to be free of evidence of man. Please take wilderness boundaries to the nearest road, not along arbitrary section lines! This area is critical as bighorn sheep habitat. What a wonderful opportunity for BLM to get into the "crown jewel" management of our public lands.

c. BLM's Indian Creek-Dry Valley Management Framework Plan found more than 22,000 acres surrounding Indian Creek to be natural and "free of the evidence of man." We ask that BLM supplement their Draft EIS to include the 26,920 acres: the length of Indian Creek and its tributaries, as well as Rustler and Horse Thief Canyons.

d. Most of the WSA's area east of the Colorado River is considered equivalent to Canyonland's Maze in terms of solitude, and naturalness, and allows for exceptional opportunities for primitive outdoor recreation. When BLM wrote its Indian Creek-Dry Valley MFP several years ago, it found 22,000 acres to be very natural and free from man's impacts. Has BLM so poorly managed this area that in just a few years, that over 20,000 acres have become unnatural and impacted?

**54.16 RESPONSE:** All of the WSA meets the criteria for naturalness, outstanding solitude, and



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 54: INDIAN CREEK WSA (CONTINUED)**

outstanding primitive recreation. BLM's Proposed Action for the Indian Creek WSA is the All Wilderness Alternative. Also, see the responses to Specific Comment 54.13 and General Comment 3.1.

**54.17 COMMENT:** Desert bighorn sheep have been observed in the Indian Creek drainage and in the Lockhart Basin area both inside and outside of Canyonlands National Park. Designating the Indian Creek unit as wilderness would benefit the sheep, as dramatic disturbance and habitat change would not be permitted to occur under wilderness management mandates. [National Park Service]

**54.17 RESPONSE:** The EIS states that bighorn sheep are present in the area and that the WSA is crucial bighorn sheep habitat.

**54.18 COMMENT:** BLM is correct in finding wilderness designation consistent with the local land use plans. The county plan asks that this area be placed in multiple use, which wilderness lands are managed under. [Utah Wilderness Coalition]

**54.18 RESPONSE:** The EIS states that the All Wilderness Alternative would conflict with the county's multiple use concept. The county plan emphasizes multiple use and zones this area for open range and forest. Wilderness uses such as livestock grazing, wildlife, and hiking would be consistent with the plan. Preventing uses such as mining, wood cutting, and vehicle access would not be consistent with the plan.

**54.19 COMMENT:** Compared to other WSAs in the region, Indian Creek Canyon WSA has moderate wilderness-quality values and moderate conflicts. There is some potential for potash and uranium/vanadium in the unit. There is also a potential conflict with development of groundwater in the deep bedrock aquifer. [State of Utah]

**54.19 RESPONSE:** BLM believes that there is a small likelihood of potash extraction, uranium mining, or groundwater development. For the BLM Proposed Action, it has been determined that wilderness values outweigh the other potential uses.

**SECTION 55**  
**BEHIND THE ROCKS WSA**

**55.1 COMMENT:** BLM's inventory of the Behind The Rocks WSA violated the wilderness inventory guidelines. [Utah Wilderness Coalition]

a. We have raised issues concerning the boundary of this study area several times in the past. We have presented new information which was not considered in the inventory. This information shows BLM failed to follow agency policy in determining which lands become WSAs. BLM has the responsibility to consider this new information and correct the boundary. In other cases, BLM has amended the inventory decisions to delete and add lands to wilderness study. In the initial inventory, BLM divided this unit into A and B subunits. No acreage figures were given. The B subunit was dropped. Where is all the published documentation on B? It violates the inventory policy to divide units, causing a subunit that clearly will not qualify for wilderness study. In this case BLM divided a unit along a completely natural cliff face and created a subunit with less than 5,000 acres. By creating an area less than 5,000 acres, BLM argued that the size of the unit disqualified it for wilderness study. In the northern part of the unit, a deletion was made to accommodate ORV activities over solid sandstone formations. This deletion also violated the inventory policy by using insignificant intrusions as justification for deleting lands from wilderness study. In the west the boundary follows a road so difficult to travel that four-wheel drive vehicles only drive the way in one direction. The western part of that area, Hunter Canyon Roadless Area, possesses some of the finest canyons and sandstone fins. We recognize the need to compromise and agree to deletion of the Prichett Canyon ORV route. Hunter Canyon still qualifies and should also be considered for wilderness designation. In the intensive inventory, BLM recommended that Moab Jeep Trail and other ORV areas (6,370 acres) meeting the naturalness criteria be dropped. This area is so dangerous for ORVs, the local club has dropped this route from its organized trips. BLM needs to

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)

reconsider this area for wilderness designation. Within the original roadless area covering 32,500 acres, 10,600 acres are contested. In the initial inventory, BLM in-correctly split Hunter Canyon from the rest of the unit and dropped it. The vehicle way which splits these requires vehicles to be winched to allow passage. BLM further used the natural cliff top to divide Behind the Rocks into two units, one of which was less than 5,000 acres and was then disqualified. In the intensive inventory, BLM deleted two mostly natural areas favored for increased off-road vehicle use by the local Red Rock 4-Wheeler Club.

b. Behind the Rocks, UT-060-140, abuts the west side of Moab. The cliff face seen from Moab was separated from the rest of this unit by using a boundary that follows the completely natural cliff top. BLM dropped the cliff face by dividing the unit. This violates the inventory policy which states that division of units must not compromise the wilderness integrity of the area. Clearly creating a subunit which fails to meet the size requirement compromised that subunits wilderness integrity.

**55.1 RESPONSE:** See the response to General Comment 3.1.

**55.2 COMMENT:** The southern part of the deleted area follows a cliff face approximately 1 mile from the nearest impact found in this area, a portion of the "Behind the Rocks 4x4 Route." All the significant impacts occur south of the WSA in an area BLM is promoting for open off-road vehicle use. The proposed Grand Resource Management Plan designates this area as an "ORV use area." The "Behind the Rocks 4x4 Route" forms a loop in this portion of the unit and covers rugged bench and canyon lands. The deletion includes not only the area containing this vehicle way but also large natural areas abutting this. In appeals on other units, the IBLA decided that BLM was in error for eliminating natural areas based on a few isolated human impacts. [Utah Wilderness Coalition]

**55.2 RESPONSE:** See the response to General Comment 3.1. The Grand RMP designated most of the Behind the Rocks WSA as closed to ORV use and the surrounding lands as open to ORV use.

**55.3 COMMENT:** Other lands which surround BLM's recommendation are deserving of wilderness designation also and should be considered. We support and encourage BLM to review in detail the Utah Wilderness Coalition's 20,000-acre proposal. This proposal will

best protect the area's outstanding scenic and natural features along with its outstanding opportunities for primitive recreation and solitude. BLM's final recommendation for wilderness should include: (1) Hunter Canyon and (2) northern tip along the Colorado River. Hunter Canyon should not be excluded because of State lands. An exchange should be included with the other proposed State lands proposal. Please note that Prichett Canyon is not in the UWC's proposal so that ORV and mountain bike interests can be met. [Sierra Club, Cache Group]

**55.3 RESPONSE:** BLM determined that 12,635 acres qualified as a WSA. Hunter Canyon, the northern tip along the Colorado, and Prichett Canyon are no longer part of the wilderness review process. See the response to General Comment 3.1.

**55.4 COMMENT:** For the Behind the Rocks WSA, why is vehicular use approved for livestock maintenance but not for research? [David Johnson]

**55.4 RESPONSE:** Continued grazing of livestock is specifically provided for in the Wilderness Act with certain accommodations, inasmuch as that use was occurring historically. Research generally would be considered to be a new use which would be subject to more stringent requirements.

**55.5 COMMENT:** How can the distant car lights of U-95 be considered an intrusion for the Cheesebox WSA, but in Behind the Rocks the lights of an entire city only a mile away are a dwarfed impact? [Kathryn Kokke Wood]

**55.5 RESPONSE:** See the responses to Specific Comments 47.14 and 50.34.

**55.6 COMMENT:** The WSA presents no management problems. The in-held State lands are not seen as a management problem. The State policy is to consider exchange of these lands on a case-by-case basis. BLM stated, "Only a few mining claims appear to possibly be valid, so that management of existing mineral uses would not be a major problem." [Utah Wilderness Coalition]

**55.6 RESPONSE:** BLM concurs that the WSA would be manageable as wilderness.

**55.7 COMMENT:** Analysis is inadequately limited. BLM states that wilderness values would be "protected in areas where management restrictions occur."

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)

This misrepresents BLM's willingness and ability to protect areas where new mineral exploration has built roads. BLM needs to explain how they will do this. Based upon the history of the past, BLM loses the ability to protect natural resources when new roads are built. BLM needs to cite the management resources available. BLM also needs to recount history of protection in this area: the number of ORV users, the number of trespass incidents, the amount of natural resource destruction, and the numbers of citations BLM has issued to protect natural resources. Our experience indicates that BLM cannot adequately protect areas where they introduce new vehicle access. [Utah Wilderness Coalition]

**55.7 RESPONSE:** BLM does not propose to introduce new vehicle access in the Behind the Rocks WSA. BLM's Proposed Action is the All Wilderness Alternative. Even with the No Action/No Wilderness Alternative, vehicle access is controlled, as follows:

In the BLM Grand RMP, 12,345 acres of the Behind the Rocks area has been placed in a no leasing or no surface occupancy category for oil and gas leasing. While the area remains open to mining claim location, no mining is expected due to low favorability and difficult terrain. Under the 3802 and 3809 regulations, extensive reclamation would be required should any mining activity occur.

In the Grand RMP, most of the lands within the Behind the Rocks WSA are closed to ORV use. This closure was implemented in 1988, with an ORV brochure, which describes in detail the closure actions. ORV access which previously occurred over the slick-rock fin to the overlook area above the Colorado River is prohibited.

**55.8 COMMENT:** No comprehensive rare and endangered species inventory has been performed. "Three rare species may occur (Asclepias cutleri, Astragalus iselyi, and Zygadenus vaginatus)." [Utah Wilderness Coalition]

**55.8 RESPONSE:** See the responses to Specific Comments 46.12, 47.17, and General Comment 13.1.

**55.9 COMMENT:** BLM vastly overestimates the mineral potential of this area. Eighteen exploration wells have been drilled in a loop around the WSA. "Numerous wells drilled in the immediate vicinity of the WSA have been dry holes." The high amount of direct evidence does not support BLM's conclusion for a "fairly

high" potential for oil and gas development within the WSA. BLM's rating the area moderate for oil and gas potential needs to be validated. None of the evidence presented in the Draft EIS reports objective data and analysis that supports that conclusion. BLM's conclusion is arbitrary. [Utah Wilderness Coalition]

**55.9 RESPONSE:** The minerals data has been re-assessed, and the ratings for oil and gas and uranium have been modified in the Final EIS. Data from 10 wells surrounding the WSA were reviewed. These wells were drilled within 2 miles of the WSA boundaries, and were drilled to sufficient depths to adequately test for oil and gas. Results indicate that seven of the wells had good shows for oil and gas. This includes one well, directionally drilled by Cities Service, underneath the WSA which encountered natural gas in the Mississippian Formation at a rate of 214,000 cubic feet per day. The well was abandoned as noncommercial due to extreme difficulties in the hole as a result of drilling across a fault zone and through a thick section of Pennsylvanian salts. This evidence indicates that BLM conclusion of "fairly high" potential for oil and/or gas is justified, and is not arbitrary.

**55.10 COMMENT:** The first paragraph refers to 12 dry holes. The last paragraph says all but one of 12 wells were dry holes. Which reference is correct? If latter reference is correct, what is the production history of the lone producing well? [Brian Wood]

**55.10 RESPONSE:** BLM re-analyzed data from oil and gas wells drilled in the vicinity of the WSA. It was found that 10 holes were drilled successfully within 2 miles of the WSA boundary. Two additional wells were spudded, but never actually drilled to depths sufficient to provide meaningful data. Of the 10 holes drilled to depth, seven had shows of oil and gas. None of the holes had any sustained production. The text of the EIS has been modified accordingly.

**55.11 COMMENT:** We examined drilling records in the vicinity of three representative WSAs to determine whether the SAI ratings themselves were reasonable. The utter lack of significant discoveries strongly suggests that the favorability ratings for these areas are too high, and hence are suspect for other areas as well.

Our assessment focused on the Negro Bill Canyon, Mill Creek, and Behind the Rocks WSAs near Moab. The EIS states that "the potential for oil and gas within the Behind the Rocks WSA is believed to be

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)

moderate (f3) for Mississippian-aged rocks and lower for Pennsylvanian-aged rocks." Similar statements are made for Mill Creek and Negro Bill. The Draft EIS further states that the best potential is in Mississippian-aged strata. This potential is based partially on the structural similarity of the WSAs to the Lisbon Valley area and partially on the proximity of past producing reservoirs in the Big Flat area. However, the Big Flat field was rapidly depleted and most authors agree that the Lisbon field is one of a kind; generalizations from these fields are not appropriate. Over 70 wells have been drilled between and around the three WSAs within a radius of about 15 miles of the center of the three areas (see figure). Nearly half of the wells (35) tested Mississippian or older strata. Nine wells produced some oil, but only two are producing today. None of the 70+ wells had significant shows in or produced from Mississippian-aged rock. The nearest wells with good shows or production are all 5 miles or more west or southwest of the Behind the Rocks WSA. Each of these wells produced from or had shows in Pennsylvanian-aged strata.

The three WSAs were rated f3 based on the potential of the Mississippian limestones; however, none of the 70+ wells had shows, much less production, from the Mississippian. Therefore, based on actual drilling, the ratings appear to be high for these WSAs. To the extent that other WSAs are subject to similar discrepancies between the SAI ratings and actual drilling records, they should be revised as well. [Utah Wilderness Coalition]

**55.11 RESPONSE:** See the responses to Specific Comments 55.9 and 55.10.

**55.12 COMMENT:** Uranium deposits are overestimated. The supporting geologic information used in preparing the SSA indicates that a much smaller quantity of uranium is present than concluded by BLM. BLM appears to have ignored uranium exploration results along the boundary area. The depth of the favorable formations coupled with the lack of significant deposits, indicate that uranium deposits of economic grade and quantity are highly unlikely. BLM needs to address the feasibility of uranium development and use only feasible mineral development when resolving conflicts with wilderness designation. [Utah Wilderness Coalition]

**55.12 RESPONSE:** BLM's re-analysis of uranium potential has indicated that the potential for this mineral was rated too high in the Draft EIS. Consequent-

ly, the rating has been changed from f3 to f2 in the Final EIS. In addition, the Final EIS presents data from past uranium exploration along the boundaries of the WSA.

**55.13 COMMENT:** The information on potash and potential for potash development should be updated. [Utah Wilderness Coalition and State of Utah]

a. Potash deposits of commercial grade are found 2,400 and lower throughout the Moab area. Hite (USGS Professional Paper 424-D) indicates that the potash minerals are abundant and can be traced continuously through a subsurface area of more than 3,000 square miles. Salt flowage in the formation containing potash may reduce the estimates BLM uses. Economic access to the deposit is favored outside the WSA which would not conflict with wilderness values. These constraints and other economic factors are not adequately considered, and estimates used by BLM rely on data at the limit of the most optimistic estimate. This information on potash was presented to BLM during the study process prior to the EIS. BLM did not respond to these comments in developing this EIS. BLM failed to investigate the amount of potash that could be removed from solution mining with portals outside the WSA. BLM falsely concludes that potash could not be removed and the surface area protected as a wilderness area.

b. The discussion on potash could be expanded. The WSA is on the west flank of the Moab valley Salt anticline, an area where the salt should be significantly thicker than in the Paradox Basin in general. The main problem with these deposits is the contorted nature of the salt, a problem which should be less severe on the limbs of the anticline. Besides this high potential for potash, the WSA has potential for regular salt (halite) which is produced by the Moab Brine Co., 2 miles east of the WSA.

**55.13 RESPONSE:** The SAI ratings of favorability and certainty of resource occurrence give a range for tonnage estimates. The f3 rating for potash in the WSA implies an estimate of 1 to 10 million tons present. This range takes into account the thickness variations caused by subsurface flowage. Wording has been added to the Final EIS to address the constraints imposed by depth to the potash, market availability, and topographic considerations. BLM has considered all useful information provided by others. BLM believes that potash cannot be successfully extracted by solution mining from outside of the WSA. Mines

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)**

would require ventilation, injection wells, and removal wells. Some, if not all, of these would require surface activities directly above the mine. Nevertheless, potash extraction from the WSA is not anticipated in the foreseeable future because the deposits are deeper than 4,000 feet and potash is available from other parts of the United States.

**55.14 COMMENT:** Incorrectly BLM fails to consider scenic vistas as a special feature in areas they wish to drop. Here BLM does consider "panoramic views of Southeastern Utah from vantage points in the WSA." [Utah Wilderness Coalition]

**55.14 RESPONSE:** In the EIS, scenic vistas are noted for those areas where they are a significant value.

**55.15 COMMENT:** The Moab Rim Trail has been used in every Easter Jeep Safari from 1968 on, and the loop trail portion has been included since 1971. At the 1986 Jeep Safari, 578 vehicles paid a \$20 registration fee. Of these, 45 vehicles traveled the Moab Rim Trail, and 15 or more unregistered vehicles were seen on the trail that day. Another 14 vehicles participated in a pre-run of the trail just before the safari. The safari trail leader has run the trail eight times in the first half of 1986, each time with other vehicles. Other Red Rock 4-Wheeler members have guided groups on the trail during that period, and have given verbal advice to a few "jeep" clubs and small groups who have found the trail on their own. Furthermore, on all of our trips, we find tire tracks that give evidence of other visitors. A conservative estimate, considering just the trips we have been involved with, might be that more than 100 vehicles--at least 300 people--have traveled the trail from January through July of 1986. A 24-page tabloid newspaper, prepared for publicizing the 1986 Jeep Safari, featured a front-page photo, taken from Poison Spider Mesa, showing several vehicles on the river-overlook fin amid the grandeur of Behind the Rocks and the LaSal Mountains. In April 1985, Four Wheeler Magazine (Ref. 2) had four pages of text and photos on the 1984 Jeep Safari on the Moab Rim Trail. In March 1986, the same magazine (Ref. 3) had a long article on testing six vehicles for their "4-wheeler of the year" award, and a considerable part of their testing, their most dramatic photos, and much tough-trail bragging came from the Moab Rim Trail. The article was filled with photos of canyon country trails, including the Moab Rim. The July 1986 issue of 4 WD ACTION magazine has four pages of "Journey into

Moab," including Moab Rim Trail (the large photos on pages 68 and 70 show the "death row" descent). The searchers, a company based in Cortez, Colorado, makes and sells video tapes to exemplify the best off-road-vehicle trails, and the Moab Rim Trail was one of the first tapes they made. [Red Rock 4-Wheelers]

**55.15 RESPONSE:** Several comments were received concerning a portion of the present Moab Rim Trail which was included inside the WSA. The earliest permit on file for the Moab Jeep Safari was issued in March 1973 by BLM to the Moab Chamber of Commerce. The portion of the trail in question is not shown on the official route map for the Moab Rim Trail attached to the permit. A March 1978 article in the Moab newspaper describes accurately the route used, which is the same as the permit map. No mention is made in the article of an additional route on the fins to a point overlooking the Colorado River. A map of "Canyon Country Off-Road Vehicle Trails" (copyrighted by F.A. Barnes in 1978) shows the trail as depicted on the official 1973 permit map. File photographs dated 1978 show vehicles apparently traveling out on the fin near the overlook. A detailed ORV inventory conducted in 1979 by several persons did not reveal the route over the slickrock fins to the overlook. An article in March 1984 in an issue of Grand Sun Circle printed a map of the Moab Rim Trail as depicted in the original permit; however, the text of the article mentions that "another trail peeling off the rock mountain loop goes over to a spectacular down-river view from a dangerous narrow fin trail out on the rim rock." Nowhere in the file is there any reference made to altering the originally approved jeep safari route map.

An interview with the man credited with establishing the Moab Rim Trail indicated that in the early 1970s he pioneered the fin route to the overlook to improve the variety and challenge, and that it had been used every year since then. He indicated that the description and maps of the trail were not updated because so few people actually knew the location on the ground.

BLM has concluded that the route is a pre-FLPMA vehicle way, and it is reflected as an "intrusion" in the wilderness inventory file.

**55.16 COMMENT:** The loop spur of the Moab Rim Trail should not be included in the WSA. [Red Rock 4-Wheelers]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)

a. The particular concern of these comments is a well-established off-road trail, called the Moab Rim Trail, that borders on, and encroaches upon, the Behind the Rocks Wilderness Study Area. This trail has been used for the past 19 years in the annual Easter Jeep Safari, and it has been the main subject of national magazine articles in addition to its description in trail guides. The trail's reputation draws four-wheel drive enthusiasts to the area throughout the year. The encroaching portion of the trail had been used several years prior to the inventory of roads (1978) in the WSA, but apparently escaped notice because much of it is on slickrock or sandy soil where tracks disappear quickly.

b. Specifically, what I'd like to talk about is the Moab Rim area, which happens to be my trail and safari. Apparently, after the 1978 inventory which was overlooked, there are roads up there. Some people don't call them roads, but I've been over it seven times, and I haven't scratched my vehicle once. They are rough roads, but they are roads. And this is an area that is known nationwide, and it is something that people come to see. It is primarily on slickrock. You can drive over this area. I have taken 40 to 50 vehicles over it. The next day you can't see where we've been, except the sand between the ridges. So I would hope that we do allow our beautiful area to be enjoyed by all and not just hikers.

c. The short loop trail and spur include some of the most spectacular and exciting four-wheeling to be found anywhere. It is as demanding on vehicle and driver as the river-to-rim portion of the trail, and is far more thrilling. The small area enclosed by the loop trail would seem to have little wilderness merit in comparison to the rugged fin country to the south. Indeed, the enclosed area could remain in the WSA, if desired, but the trail portion is important to the image of this area as a "jeeper's paradise."

d. The fact that the loop trail portion described here was included in the Behind the Rocks WSA appears to be a sort of oversight. The inventory of roads affecting the WSA boundaries acknowledged the Moab Rim Trail, but the loop trail extension had been made deliberately so unobtrusive that it escaped notice. The loop trail portion now within the WSA is small in size and does not include the type of spectacular terrain that makes Behind the Rocks so attractive for wilderness status. Its loss to the wilderness area would be insignificant, but its importance to the

tourist and recreational industry in the area is considerable.

**55.16 RESPONSE:** The main stem of the Moab Rim Trail forms portions of the north and northeastern boundary of the WSA. The branch trail that goes to the overlook above the Egg Ranch and then rejoins the main trail close to Indian Fort is entirely within the WSA. The branch trail does not meet the wilderness inventory definition of a road as there is no evidence of construction or maintenance. The branch trail also is located within an area closed to ORV use in the Grand RMP. See the response to Specific Comment 55.7.

**55.17 COMMENT:** We would like to make a brief comment on other trails proposed for closure in the Behind the Rocks WSA. Well-established spur trails exist just south of the "Indian Fortress," in a side canyon of Pritchett Canyon, and branching east from the Pritchett Canyon trail just south of the pass dividing Hunter from Pritchett drainages. Other less well developed trails appear in the south end of the region. All of these trails are short and come to dead ends for vehicle travel. None has features that are of interest for recreational four-wheeling, and their loss would be insignificant from that standpoint. Nevertheless, it happens that almost all of these trails have been used by members of our club for hiking access; it seems a shame to make it more difficult for individuals to enjoy day hikes into this fascinating country. [Red Rock 4-Wheelers]

**55.17 RESPONSE:** Hikers may use all of the trails in the WSA. Vehicle access to trailheads is possible in several locations, but vehicles must remain outside of the area closed to ORV use. This situation is the same for both the No Action/No Wilderness Alternative and the All Wilderness Alternative, as the area currently is closed to ORV use, as noted in the response to Specific Comment 55.7.

**55.18 COMMENT:** The Behind the Rocks wilderness study area contains portions of well known jeep trails but has other trails which are popular for mountain bike use. In a close proximity to Moab, it encourages those who like to stay in hotels and use the town for basing their activities. This close proximity to trails like Behind the Rocks promotes the economic benefit. I feel personally that the Behind the Rocks WSA is one area that should be possibly transferred to the State for a State park. If it were a State park, then all of the needs, whether backpacking type of hiking,

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)**

mountain biking, or four wheeling, and the preservation criteria could all still be met. [Dave Jarvis]

**55.18 RESPONSE:** Mountain bikes are considered to be vehicles and are not allowed in the portion of the WSA closed to ORVS. See the response to Specific Comment 55.17.

**55.19 COMMENT:** The Behind the Rocks WSA is almost inexhaustible in its variety and interest. I am working with a group in town which is attempting economic revitalization of the area through promotion of the tourist and outdoor recreation industries. Among other measures, we are planning to build trails starting in town that go into Behind the Rocks. Market analysis shows that wilderness designation is a major "sales feature" for an area in terms of its interest to visitors. The ability to hike from town directly into a designated wilderness area with outstanding features like the numerous arches, fins, hanging gardens, etc., in Behind the Rocks would be very beneficial to local economic efforts. The boundaries used by BLM leave out natural areas which should be part of the total preserve. [Richard Christie]

**55.19 RESPONSE:** Hiking trails need not be limited to designated wilderness areas. Regardless of wilderness designation for the Behind the Rocks WSA, trails may be provided from Moab to various points of interest, both inside and outside of the WSA. Trails may not be constructed on public land by other agencies, groups, or individuals without permission granted by BLM.

**55.20 COMMENT:** BLM has correctly recognized the diversity of Behind The Rocks. [Utah Wilderness Coalition]

a. Although the area has not received full inventory of wilderness values, what is known justifies wilderness designation. BLM is correct in considering a wide range of values in considering the diversity of the National Wilderness Preservation System.

b. In areas BLM recommends to drop, only the diversity of plant communities is considered in the diversity criterion. Here BLM correctly considers the diversity of landform and states that this landform would contribute to that diversity.

**55.20 RESPONSE:** BLM's Proposed Action is the All Wilderness Alternative, based on the quality and diversity of wilderness values. This WSA is consid-

ered to have landforms which would be a unique addition to the National Wilderness Preservation System. Also, see the response to General Comment 8.22.

**55.21 COMMENT:** This delightful, modest area is handy to the busy urbanite as well as the Grand County locals who have enjoyed it for decades. It is modest and moderate throughout much of its area, and while not saying it doesn't have its magnificent topographic relief, it is still ideally enjoyed by young children, the old, and the infirmed who can easily enjoy the pristine respite from the hustle and bustle of civilization, including the nearby tourist town of Moab. For scenery, wildflowers, geology in action, photography, and the enjoyment of wildlife, this area is ideally situated to introduce any novice to wilderness, and to refresh easily the most jaded adventurer. Only a misguided, uninformed person could fail to see how the community will benefit economically from having such a handy attraction in its backyard. The county has much to gain from marketing itself as being surrounded by such wonders as Westwater Canyon, Behind the Rocks, and Negro Bill Canyon, and will surely enjoy benefits already reaped by other communities situated near equally popular wilderness areas. Wilderness designation increases visitation and tourists. Unlike uranium, these are a renewable resource. [Linelle Wagner]

**55.21 RESPONSE:** BLM has estimated that recreation visitation would increase with or without wilderness designation.

**55.22 COMMENT:** Behind the Rocks WSA has both moderate wilderness-quality values and conflicts as compared to other WSAs within the region. Conflicts include a moderate potential for potash, uranium/vanadium, and petroleum, and water development. Adjacent private lands may pose management problems. [State of Utah]

**55.22 RESPONSE:** See the responses to Specific Comments 55.9, 55.10, 55.11, 55.12, and 55.13 relative to potential for potash, uranium, and petroleum. No proposals or conflicts with potential water development have been identified, other than an old powersite withdrawal on 340 acres of the WSA as noted in the EIS. Private lands are not expected to adversely affect wilderness management, as there are no private in-holdings and there is considerable terrain separation between the WSA and the private development in the valley.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)**

**55.23 COMMENT:** How will it affect our utility & pipeline right-of-way in Secs. 10 and 21, T. 26 S., R. 21 E., SLB&M for our spring water rights. Also, the present roads that exist which we still have need of, will they be closed to us and ORVs, etc.? [Lucy Nelson]

**55.23 RESPONSE:** The right-of-way referenced in the comment was authorized prior to 1976 and would remain unaffected by wilderness designation of the WSA. The right-of-way holders would continue to have the right of reasonable access for maintenance needs.

**55.24 COMMENT:** There is a 345 KV transmission line and utility corridor just east of this area and a 69 KV transmission line along a portion of the north border. As the name implies, this wilderness area should be designated behind the rocks. UP&L recommends withdrawing the north boundary to the top of the cliffs, as the easterly boundary has been. [Utah Power and Light]

**55.24 RESPONSE:** The 345 KV powerline is outside of the WSA. The 69 KV line is within the boundary of the WSA, but the existing right-of-way is of sufficient size to allow for upgrading on the line, if needed.

**55.25 COMMENT:** BLM indicates that wilderness designation would have no significant adverse or beneficial effect on the local or regional economy, although it is inconsistent with local plans. No explanation is given. As with many WSAs, BLM does not clearly explain what local planning is and how it affects this area. BLM has reprinted without clarification local government's definition of "multiple use." BLM needs to describe how this differs with the legal description. BLM needs to quote from the plan. The Draft EIS should not use the word "multiple use" where it can be confused with the legal description BLM follows. We suggest using "local government prescribed use." BLM needs to explain that this prescribed use conflicts with the mandate of the agency. The local plan should be explained further. Does it support protection of any public lands? What uses outside wilderness areas does the plan propose? [Utah Wilderness Coalition]

**55.25 RESPONSE:** See the responses to General Comments 24.5 and 24.14 regarding economic effects. Consistency, or lack thereof, has little to do with economic effects. While the objective of local

plans may be to encourage economic gains, there is no assurance that it would occur. Regional and national market factors generally would have a much larger influence on economic effects than land use plans. Multiple use is defined in the EIS Glossary. The definition is sufficiently broad to fit both BLM's concept and the local concept of multiple use. Also, see the response to General Comment 1.2 concerning the definition of multiple use.

**55.26 COMMENT:** BLM's Proposed Action for the Behind the Rocks WSA allows continued development of existing valid mining claims and continued livestock grazing. In this particular WSA, the adverse impact of mining and grazing activities on the wilderness attributes is potentially far greater, and their economic value probably far less, than that of keeping the Moab Rim Trail open in its entirety. [Red Rock 4-Wheelers]

**55.26 RESPONSE:** Regarding mining claims, see the response to Specific Comment 55.7. Livestock use of the WSA is rather limited (60 AUMs and no developments) and this limited use is expected to continue with no change in existing impacts. The jeep safari use would be allowed to continue on the originally approved Moab Rim Trail route, with or without wilderness designation.

**55.27 COMMENT:** We recently had a story on the area in Three-Wheeler Magazine. Sounds like a very interesting area, and I would like to gather as much information as I can, with the prospect of planning a week's vacation in Moab. My interest is in camping, photography, and exploring the outdoors. My friends and I have four-wheel drive trucks and four-wheel ATVs. We are not coming out here to go backpacking. Not all tourists are backpackers, and these ATV people do come into the area and bring much needed revenue to businesses and stores. I know that during the jeep safari many of the businesses in town registered their largest sales volume for that day. City Market, for instance, the grocery store, was printed in the paper to that fact. [Red Rock 4-Wheelers]

**55.27 RESPONSE:** The popularity of ORV use on the Moab Rim Trail is described in the EIS.

**55.28 COMMENT:** On Map 1, note that the WSA boundary excludes the split estate mentioned on page 1 and page 18. [State of Utah]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 55: BEHIND THE ROCKS WSA (CONTINUED)**

**55.28 RESPONSE:** The WSA boundary bisects the split-estate Sec. 2, T. 27 S., R. 22 E. About 135 acres in the southwest corner are within the WSA, as explained in the EIS. The map has been revised accordingly.

**55.29 COMMENT:** Page 11, Oil and Gas, Paragraph 7: The third sentence "About 6,274 acres . . ." is confusing. [State of Utah]

**55.29 RESPONSE:** The sentence has been rewritten.

**55.30 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work and perhaps, exploratory drilling to determine if such deposits do exist, and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which led us to this recommendation. [Exxon Corporation]

**55.30 RESPONSE:** See the responses to General Comments 15.1, 15.3 and 15.13.

**SECTION 56**  
**MILL CREEK CANYON WSA**

**56.1 COMMENT:** BLM made many errors in defining the boundary of this candidate wilderness area. The inventory policy requires that BLM use significant human impacts to define boundaries. In this case, BLM defined the boundary to exclude large natural areas from inclusion in the candidate area. In the north on the rim above Mill Creek, BLM used a boundary that follows section lines up to 2 miles from the nearest human impact. Under the inventory policy, BLM was not allowed to delete natural areas from study. We request that this boundary move to the edge of human impacts. BLM is requested to produce an impact map which justifies the boundaries used. In the south, BLM deleted most of South Mesa. A long stem is deleted

too near the Mill Creek. This area does not contain significant human impacts. We have produced information and provided this to BLM on the location of impacts and their significance. There is not a vehicle way that is evident to a visitor in that area. We request information from BLM that shows the data and description of the construction of such a way, its use, and the current character of this impact. BLM's boundary clearly violates the inventory policy in this area by deleting a large area because of an insignificant impact. In the west BLM cherry-stems the stream from the WSA. BLM can only cherry-stem routes that qualify as roads. There is no evidence of regular use for a stated purpose, construction, and regular maintenance. The western boundary follows a topographic feature on the southwest side excluding most of the natural bench area. To comply with the inventory policy, BLM must include this area in the wilderness study. [Utah Wilderness Coalition]

**56.1 RESPONSE:** The inventory phase has been completed. See the responses to General Comments 3.1 and 3.43.

**56.2 COMMENT:** BLM's map in the analysis shows a cherry-stem 1.25 miles up from the mouth of the North Fork. This is ridiculous and shows BLM's lack of on-the-ground knowledge of wilderness values even in an area that is virtually on the doorstep of the District Office. No ORV can possibly make it above the first waterfall--there are no vehicle tracks let alone a constructed and maintained road or substantially noticeable way. Why is this cherry-stem shown? It seems to be a blatant attempt at denigrating the WSA's natural values. There has never been a vehicle on the upper mile of the 1.25-mile cherry-stem. This concern is amplified by BLM's statement that only 2,800 acres of the WSA ("the canyon and fin areas") have outstanding opportunities. The whole WSA is canyons and fins. Where are these 2,800 acres? [Rodney Greeno]

**56.2 RESPONSE:** The map in the Draft EIS was in error. The actual cherry-stem is shown in the Final EIS. It goes to the first waterfall. The west end of the WSA comprises the 2,800 acres that have outstanding solitude.

**56.3 COMMENT:** The impact of perimeter roads is often overstated in the Draft EIS. The analysis of many of the WSAs overestimates the impact from perimeter roads and, as a result, incorrectly concludes

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

that certain large areas are not suitable for wilderness designation. [John Veranth]

**56.3 RESPONSE:** Perimeter roads are not a factor in the determination of BLM's Proposed Action for this WSA.

**56.4 COMMENT:** BLM should acquire State in-holdings and should not use in-holdings as rationale for not recommending wilderness. [Utah Wilderness Coalition]

a. There is also a State in-holding which has been excluded from the area. I would hope that a land trade could be pursued to permit this to become part of the wilderness area. The State in-holding includes some magnificent terrain which should logically be part of the wilderness area.

b. BLM claims that adequate management of mining leases on State lands would not be possible in a wilderness area. In this case, the agency's recommendation is based on a law not yet passed by Congress--the proposed Project BOLD trade of State and Federal lands. BLM continues to apply legal interpretations that have been proven wrong. Pre-FLPMA claims and leases give the permittee the authority to conduct the same activities in the same manner and degree that existed prior to 1976. BLM quotes no legal authority that supports its nonwilderness recommendations. To base recommendations on invalid citation of law violates the wilderness study process. Again BLM exaggerates the conflict between wilderness designation and mineral development. BLM ignores recent and historic oil and gas exploration in this area, and incorrectly concludes that there is a "moderate favorability for oil." By ignoring current information, BLM attempts to hide evidence that would invalidate their favorable resource assessment.

**56.4 RESPONSE:** There are no State lands or State leases within the Mill Creek Canyon WSA. There are State lands adjacent to the WSA. Also, see the response to Specific Comment 50.3.

**56.5 COMMENT:** No rationale is given, but BLM does draw conclusions on the alleged conflicts and wilderness qualities. BLM used every angle to drop this area from wilderness study. The conflict of interest between the wilderness coordinator and the leader of the local off-road user club was part of the reason for continued opposition. The other key factor was

local government's opposition to the designation of this area. Grand County's opposition is philosophical; they are against all wilderness everywhere. No resource or project conflicts are given for their opposition. With BLM fully aware, the county used their maintenance equipment to stage a protest within the WSA. It was a protest parade on the 4th of July. On that day, they misjudged where the boundary was. In violation of the inventory, BLM had moved the boundary 2 miles from the nearest impact. Later the county came back to cut a short (100 yard) blade path in the rolling sand dunes and grass on the bench north of Mill Creek. BLM never took legal action on this trespass. This, of course, violates the Inventory Policy and FLPMA. BLM does not have the authority to use areas as political bargaining chips. We ask for a recount of BLM's version of this story in response to our comments in the Draft EIS. What legal action did BLM take against the county and what reclamation did BLM require on the impact? As with all areas, we request that BLM produce a record of actions that have occurred in the roadless area since the passage of FLPMA. For public analysis, this requires a map of the action's location, a history of the action, and the significance of the impact on the wilderness values. BLM is required to keep this information by regulation, so information does exist. [Utah Wilderness Coalition]

**56.5 RESPONSE:** BLM's Proposed Action in the Final EIS is the All Wilderness Alternative. The rationale is given in Appendix 11 in Volume I. There was no conflict of interest between BLM personnel and others. After the blading incident, BLM consulted with legal counsel and with the county, and such actions by the county were stopped. Damage to wilderness values resulting from the County action was minimal, since the road bladed previously was an existing trail. Restoration activities were undertaken by BLM YACC members using hand tools. A map is not needed. The matter currently has no bearing on BLM's Proposed Action. Also, see the response to General Comment 5.1 concerning IMP actions.

**56.6 COMMENT:** Consistently throughout the Draft EIS on this area there is a bias against wilderness. The Draft EIS reports the incredible diversity of the wildlife, scenery, recreation activities, cultural resources, and solitude. Yet when BLM proposes the area nonwilderness, the destruction of this under their worst-case analysis is hollow and unfinished. BLM fails to determine if the worst-case development analysis would have a significant effect on wilderness

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

values and offer a quantified amount of damage that could occur. BLM indicates that only 8 acres would be impacted due to what is likely to be infeasible mineral development. We request a map showing the location and kind of impacts BLM uses to make this claim. [Utah Wilderness Coalition]

**56.6 RESPONSE:** The EIS provides adequate information in narrative form, and a map is not needed. The Final EIS projects 40 acres of disturbance with the No Action/No Wilderness Alternative and 0 acres of disturbance with the All Wilderness Alternative. A worst-case analysis is not used in the Final EIS. See the response to General Comment 9.12. BLM's Proposed Action in the Final EIS is the All Wilderness Alternative.

**56.7 COMMENT:** The actual reason for BLM's opposition to wilderness designation for Mill Creek Canyon does not appear in the Draft EIS. BLM has concluded that the Behind the Rocks WSA will be enough wilderness in the region, Mill Creek would be too much. Of course, that is not what the Draft EIS says. Instead, the Draft EIS invents arguments to support its untenable position. [Utah Wilderness Coalition]

**56.7 RESPONSE:** The comment is incorrect. BLM's Proposed Action is the All Wilderness Alternative.

**56.8 COMMENT:** The burden is on BLM to produce a professional and consistent study. Through distortions, invalid legal references, exaggerations of resource conflicts, and depreciation of wilderness values, BLM has destroyed the professional integrity of the wilderness study of this WSA. By twisting each argument in order to support its decision preconceived outside the process, BLM weakens the credibility of its recommendations for this and other WSAs. [Utah Wilderness Coalition]

**56.8 RESPONSE:** The EIS presents factual data, reasonable estimates, and information based on professional judgments. The wilderness review process has been carried out by professional specialists and managers. Given the subjective nature of the wilderness criteria, individual judgments are involved. See the responses to Specific Comment 26.51 and General Comment 8.6.

**56.9 COMMENT:** BLM should be reminded that this area was once before removed from wilderness consideration but then the Interior Board of Land Appeals reinstated it. This area has received tremendous wil-

derness support in the past. [Sierra Club, Cache Group]

**56.9 RESPONSE:** BLM is aware of the history and interest in the Mill Creek Canyon WSA.

**56.10 COMMENT:** It is difficult to tell why this area does not qualify as wilderness. The Draft EIS points out:

(1) There are no significant resource conflicts.

(2) Only "moderate probability for development."

(3) The "area has yielded few, if any, valuable mineral materials."

We note that the outside sights and sounds from nearby Moab, Utah, do not diminish the wilderness qualities of Mill Creek. These peripheral conflicts are minimal compared to those found in already established Forest Service wilderness areas outside of Salt Lake City and in the Wellsville Mountains Wilderness Area between Logan and Brigham City, Utah. [Sierra Club, Cache Group]

**56.10 RESPONSE:** BLM's Proposed Action in the Final EIS is the All Wilderness Alternative. The rationale is given in Appendix 11. See the responses to General Comment 8.24 and Specific Comments 47.14 and 50.34 concerning outside influences.

**56.11 COMMENT:** The Draft EIS claims that: "The area does not give the visitor a feeling of vastness." There you go again, speaking out of both sides of your mouths! Many areas throughout the State have been dropped from further consideration because they were vast and wide open and "lacked topographic screening." Mill Creek has deep winding canyons and plenty of topographic and vegetative screening so you drop it because it is not vast and wide open!!!! The only aspect of the entire Draft Environmental Impact Statement that is consistent is its totally unjustified anti-wilderness bias. I ask the question again: Why is Mill Creek Canyon not recommended for wilderness designation? Your agency "discovered" a previously unknown "road" in the WSA that "pinched off" the roadless area and "diminished" the opportunities for solitude and primitive recreation. I have been all through the WSA and can assure you that no such road exists! This ludicrous situation leads me to suspect that the bureau is once again caving in to political

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

pressures from both the kneejerk anti-wilderness forces and from ORV enthusiasts. [Scott DeLong]

**56.11 RESPONSE:** The description of the wilderness qualities and other aspects of the WSA is accurate. The All Wilderness Alternative is proposed for wilderness designation in the Final EIS.

**56.12 COMMENT:** The only anti-wilderness statement is the "hint" that commercial outfitting would benefit from vehicular access to the area. The consideration of benefiting local jeep tour companies does not justify denying wilderness protection to this natural area. ORV "play" activities in this area would be harmful to the riparian ecosystem, and seriously degrade the solitude and naturalness. The same argument applies to Negro Bill Canyon WSA. There are no resource conflicts present, and the WSA is an outstanding natural recreation area. Allowing ORVs into this area is also harmful to the very qualities which make the WSA attractive as a natural recreation area: quietness, naturalness, and the riparian ecosystem. Both of these areas should be recommended for wilderness designation; especially since it is possible to travel up into one canyon and exit from the other. It is widely known among the wilderness cognoscenti, that in the past, county officials drove bulldozers into both of these WSAs (with impunity) to demonstrate their disapproval of wilderness. The insular attitudes of a few who believe they will benefit economically by nonwilderness should not take precedence over national and Statewide interests to preserve these areas. BLM should stand firm on the issue of wilderness and impartially follow the legal guidelines of the 1964 Wilderness Act. Under these guidelines, Negro Bill and Mill Creek Canyons would both certainly become wilderness areas. [Martha Berth]

**56.12 RESPONSE:** BLM's Proposed Action in the Final EIS is the All Wilderness Alternative for both the Mill Creek Canyon and Negro Bill WSAs.

**56.13 COMMENT:** The wilderness values in this area outweigh possible mineral conflicts. The EIS acknowledges that the probability of development is only moderate. Existing claims and leases will ensure continued access to the most significant resource locations provided that the economics of extraction are sufficiently favorable to justify retaining these rights. Why is the oil potential a factor in the analysis when the EIS admits that the WSA has not experienced any serious oil and gas exploration? [John Veranth]

**56.13 RESPONSE:** Leasing information has been updated in the Final EIS. The potential for oil and gas discovery in the WSA is rated moderate (f3) based on the geologic situation and records of exploratory drilling in the vicinity.

**56.14 COMMENT:** Failure to designate this Mill Creek Canyon as wilderness will allow the area's unique values to be eroded away by ORV use, drilling, and other potential developments. It is far too important in its natural state to allow that to happen. BLM should reverse its recommendation and support the All Wilderness Alternative. [Utah Wilderness Association]

**56.14 RESPONSE:** BLM's Proposed Action is the All Wilderness Alternative.

**56.15 COMMENT:** Mill Creek Canyon is a superb example of an unimpaired desert riparian area. The winding slickrock canyons, punctuated with sandstone fins and hoodoos, make a breathtaking contrast with the more than 20-mile-long perennial stream and its lush green vegetation. The riparian habitat allows for a wide variety of wildlife to call this area home. I cannot think of more than a handful of similar desert riparian areas in the State--and most of these have already been impacted by man. The Mill Creek Canyon WSA poses a unique wilderness opportunity in the region. I truly do not understand why the bureau opposes wilderness designation for this enchanting area. With the exception of a few local anti-wilderness kneejerks, everyone I know sings the praises of Mill Creek. The Draft EIS acknowledges that there are no significant resource conflicts within the WSA. You do mention that "outside sights and sounds" emanating from Moab are detrimental to the quality of the wilderness experience. What a bunch of hogwash! The proximity of Moab to this wilderness gem makes the first rate quality of the wilderness experience even more amazing. Ask anyone who has ever used the Mount Olympus, Lone Peak, or Twin Peaks Forest Service wildernesses whether looking down on a city 100 times more populous than Moab affected the quality of their wilderness experience. They will all tell you that it did not. In addition, these wildernesses (and others) actually look down on the cities whereas the Mill Creek WSA is very effectively screened from the small town of Moab by its deep sinuous canyons! Sure, there are some spots in the WSA, mainly on the canyon rims, where you can see Moab off in the distance. So what?! [Scott DeLong]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

**56.15 RESPONSE:** See the responses to Specific Comments 56.10 and 56.12.

**56.16 COMMENT:** Mill Creek has important perennial streams (about 20 miles) and associated watersheds that are very unique for this part of Utah. They will receive required protection only through wilderness designation as proposed by the Utah Wilderness Coalition. This will protect important and outstanding riparian habitats also. [Sierra Club, Cache Group]

**56.16 RESPONSE:** The presence of significant riparian habitat is noted in the EIS. Wilderness designation is not the only way to manage and protect such riparian values. They are protected by Executive Order and other laws and regulations as well.

**56.17 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work and perhaps, exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which led us to this recommendation. [Exxon Corporation]

**56.17 RESPONSE:** See the responses to General Comments 15.1, 15.3, and 15.13.

**56.18 COMMENT:** BLM ignores exploration within the nearby area. There has been a high number of wells drilled surrounding this WSA, some of them recently. The exploration has consistently established that the possibility for oil production is low in this area. We request that BLM produce the information that supports these claims. The report BLM uses is the SAI mineral analysis which fails to use current information and makes assumptions which need explanation. There is no data or methodology that describes or validates the BLM estimates of oil or gas with the WSA. BLM's mineral assessment for oil and gas is biased and inconsistent with existing data. BLM fails to address the feasibility of mineral develop-

ment. In the case of potash, BLM states that the resource is 7,000 feet underground and of marginal quality and quantity. BLM needs to assess the need for this mineral (its market; the sources in the region, USA and worldwide; the relative costs of producing the deposit within the WSA relative to other sources; and the environmental and engineering limitations that would affect the mining of potash). Without this kind of analysis, it is impossible for BLM to determine if this is a significant conflict with wilderness designation. [Utah Wilderness Coalition]

**56.18 RESPONSE:** All of the data for surrounding exploration has been considered and carefully analyzed. These data indicate several wells were productive, and many had substantial shows in numerous geologic horizons. Due to the complex geologic conditions found throughout the region, many additional holes would need to be drilled before it can be "consistently established" that little or no production would be possible. Oil and gas reservoirs may cover only several hundred acres; therefore, one could be missed with widely spaced drill sites. Some of the mineral data is summarized in the Final EIS. Other data is found in BLM files and in proprietary company files. The SAI report and appendices in the EIS adequately explain the SAI methodology and assumptions, which are based on sound geologic study principles. The Final EIS addresses the development potential of the mineral commodities present.

**56.19 COMMENT:** We examined drilling records in the vicinity of three representative WSAs to determine whether the SAI ratings themselves were reasonable. The utter lack of significant discoveries strongly suggests that the favorability ratings for these areas are too high, and hence are suspect for other areas as well.

Our assessment focused on the Negro Bill Canyon, Mill Creek, and Behind the Rocks WSAs near Moab. The EIS states that "the potential for oil and gas within the Behind the Rocks WSA is believed to be moderate (f3) for Mississippian-aged rocks and lower for Pennsylvanian-aged rocks." Similar statements are made for Mill Creek and Negro Bill. The Draft EIS further states that the best potential is in Mississippian-aged strata. This potential is based partially on the structural similarity of the WSAs to the Lisbon Valley area and partially on the proximity of past producing reservoirs in the Big Flat area. However, the Big Flat field was rapidly depleted and most authors agree that the Lisbon field is one of a kind; generalizations

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

from these fields are not appropriate. Over 70 wells have been drilled between and around the three WSAs within a radius of about 15 miles of the center of the three areas (see figure). Nearly half of the wells (35) tested Mississippian or older strata. Nine wells produced some oil, but only two are producing today. None of the 70+ wells had significant shows in or produced from Mississippian-aged rock. The nearest wells with good shows or production are all 5 miles or more west or southwest of the Behind the Rocks WSA. Each of these wells produced from or had shows in Pennsylvanian-aged strata. The three WSAs were rated f3 based on the potential of the Mississippian limestones; however, none of the 70+ wells had shows, much less production, from the Mississippian. Therefore, based on actual drilling, the ratings appear to be high for these WSAs. To the extent that other WSAs are subject to similar discrepancies between the SAI ratings and actual drilling records, they should be revised as well. [Utah Wilderness Coalition]

**56.19 RESPONSE:** The BLM analysis indicates that the favorability for oil and gas is based on a reasonable interpretation of existing data and the favorability rating remains unchanged. See the responses to Specific Comments 55.9 and 55.10.

**56.20 COMMENT:** Utah WSAs are unlikely to be significant producers of potash because of much larger known deposits closer to transportation and markets. Statements regarding potash resources in Table 17 of Volume I should be qualified to account for the low likelihood of development. The Mill Creek WSA illustrates the difficulties of extrapolating geological inferences to statements of the significance of a resource. Potash is assigned a moderately favorable rating by SAI for both size of deposit and likelihood of occurrence. But the ratings do not take into account the depth of the potassium-bearing strata, at least 7,000 feet. Moreover, the deposit is likely to be relatively small, 1 to 10 tons of in-place resource. This may be why none of the WSA is currently under lease for potash. As the Draft EIS states, "The likelihood of the area being explored or developed is remote due to more favorable areas elsewhere." (Volume 5, page 22 of Mill Creek analysis). Despite a favorable geologic rating, an economic analysis would suggest that no resources of significance are present. The summary totals in the Draft EIS (Table 17 and elsewhere) would be revised to exclude potash resources that are unlikely to be developed in the foreseeable future. [Utah Wilderness Coalition]

**56.20 RESPONSE:** In the Final EIS, it is predicted that potash would not be mined or marketed from the WSA with either the wilderness or nonwilderness alternative.

**56.21 COMMENT:** The presence of a halite resource should also be discussed. [State of Utah]

**56.21 RESPONSE:** It is acknowledged that halite is found in association with the potash. Of these two salts, the potash is the resource of importance. If potash were to be extracted, halite would be a by-product for which the market currently is supplied by many other sources. Any current or future extraction and commercial development of salts in the Paradox Basin will be based on the potash market, not halite; therefore, halite is not of importance to this WSA.

**56.22 COMMENT:** Negro Bill is assigned an "Overall Importance Rating" of 3 by SAI. This is based upon ratings for uranium (f3/c2), oil and gas (f3/c2), oil and gas (f3/c2), and potash (f3/c3). No historic production has ever come from Negro Bill for any of these three resources. The OIR rating of 3 assigned by SAI to Negro Bill should be adjusted downward for all three "resources" based on the problems of access, steep topography, depth to potential deposits, current and likely future market conditions, and the existence of other more abundant, higher quality resources elsewhere. With 11 existing leases, no oil and gas has ever been shown or produced from the WSA. SAI's analysis is admittedly highly speculative and based upon the extrapolation of trends, no field work. Given the costs of exploration and the existence of much more promising localities it is unlikely that oil and gas development will ever occur. The potash deposits below 7,000' will never be developed with high-grade near surface deposits elsewhere. Uranium shows only slight favorability at depth and does not exist as a potential resource in any event.

A copy is attached of a BLM action sheet which lists the major reason Negro Bill and Mill Creek Canyon have been dropped from the "tentative Proposed Action" is "mineral potential." The sole basis for this appears to be the SAI OIR rating. This conclusion on the part of BLM prior to USGS fieldwork is unsupported and should be rescinded. The SAI conclusion is based upon a cursory literature search and is unsupported by any real geologic data. In any case USGS, not BLM, is the agency with the competence to make this decision. [Roy Young]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

**56.22 RESPONSE:** See the responses to Specific Comments 56.18, 56.19, and 56.20 and General Comments 15.7 and 15.65.

**56.23 COMMENT:** I object to BLM's assertion that the WSA is 80 percent Class B scenery and 20 percent class C scenery. The perennial stream adds a whole new flavor to the scenery. Splendid slickrock walls predominate along much of the course of the main canyon. The side canyons contain numerous seeping springs and pools, as well as lush vegetation and soaring slickrock. Burkholder Canyon contains an area know as Valley of the Gnomes, which includes at least three arches and innumerable hoodoos. [Henry Wright]

**56.23 RESPONSE:** It is true that high scenic values in most of the WSA. According to an independent visual resources inventory, prepared by Meiji Resource Consultants (and following BLM VRM methods as explained in Appendix 7 of Volume I), about 80 percent of the WSA is Class B and 20 percent is Class C scenic quality.

**56.24 COMMENT:** The primary human use for this area has always involved nonmotorized recreational activities. This use should be protected. This can only occur through complete wilderness designation. [Sierra Club, Cache Group]

**56.24 RESPONSE:** Wilderness designation is not the only technique for suitable management of non-motorized recreation. Currently, in the BLM land use plan, the WSA is an ORV limited use area and new access routes are not allowed. About 250 visitor days of ORV use now occurs on existing trails in the WSA.

**56.25 COMMENT:** Various people in Moab are developing tourism and outdoor recreation opportunities as a means of economic revitalization for the area. One element in our activity is building trails into Mill Creek which start from town. Wilderness designation has marked attraction to visitors, which market analysis shows. Wilderness designation for Mill Creek WSA would be a boon to our economic revitalization efforts. The local political leadership is evolving away from its historical romance with extractive industry, and approaching an understanding that wilderness designation can have economic benefits instead of simply viewing wilderness designation as hostile obstructionism towards local economic well being. [Richard Christie]

**56.25 RESPONSE:** See the response to Specific Comment 55.19.

**56.26 COMMENT:** We disagree with BLM on its assessment of which acres in this WSA have wilderness values that outweigh nonwilderness development. The configuration of the unit does not present the difficulties claimed in the Draft EIS, not even remotely. Far more than 5,000 acres exist at Mill Creek Canyon which would qualify for wilderness designation. [Utah Wilderness Coalition]

**56.26 RESPONSE:** See the response to Specific Comment 56.12.

**56.27 COMMENT:** This delightful, modest area is handy to the busy urbanite as well as the Grand County locals who have enjoyed it for decades. It is modest and moderate throughout much of its area, and while not saying it doesn't have its magnificent topographic relief, it is still ideally enjoyed by young children, the old, and the infirmed who can easily enjoy the pristine respite from the hustle and bustle of civilization, including the nearby tourist town of Moab. For scenery, wildflowers, geology in action, photography, and the enjoyment of wildlife, this area is ideally situated to introduce any novice to wilderness, and to refresh easily the most jaded adventurer. Only a misguided, uninformed person could fail to see how the community will benefit economically from having such a handy attraction in its back yard. The county has much to gain from marketing itself as being surrounded by such wonders as Westwater Canyon, Behind the Rocks, and Negro Bill Canyon, and will surely enjoy benefits already reaped by other communities situated near equally popular wilderness areas. Wilderness designation increases visitation and tourists. Unlike uranium, these are a renewable resource. [Linelle Wagner]

**56.27 RESPONSE:** BLM has estimated that future recreational visitation would not be significantly different with any of the alternatives.

**56.28 COMMENT:** BLM's assessment of opportunities for solitude and primitive recreation are not accurate. [Sierra Club, Cache Group; Owen Severance; John Veranth; and Henry Wright]

a. We disagree with BLM's conclusions that parts of this WSA contain no solitude or primitive outdoor recreation opportunities. The entire area has outstanding opportunities for primitive outdoor recreation and

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

solitude within a natural setting that clearly outweigh any potential development plans and values.

b. I disagree with the statements on solitude and primitive recreation. All of the WSA provides outstanding opportunities for both solitude and primitive recreation. The analysis of this WSA was not done by impartial BLM personnel. Also, the WSA does contain Class A scenic quality areas even though the Draft EIS denies it. An impartial review of this WSA by BLM would change the Proposed Action to All Wilderness.

c. I object to BLM's statements upon solitude. In fact, when one is at the bottom of the canyon, the sights and sounds of man-made intrusions are almost entirely invisible and inaudible, and it is here where the majority of recreational use is likely to be concentrated. The lush vegetation and slickrock provides screening throughout a greater proportion of the WSA than is credited by BLM. Whatever intrusions may exist are very minimal when contrasted with the wide range of natural sights and sounds. If an audible test of "distant sounds of trucks" is to be imposed upon a WSA, it is hard to see how any WSA could ever be selected in this day of numerous highflying (and lowflying) aircraft. I would submit that BLM is imposing an overly strict test in its attempt to disqualify this WSA. Finally, not only is BLM applying an incorrect test, it also is leaving the casual reader with the misunderstanding that this WSA is surrounded by noisy industrial and commercial development, whereas, in fact, firsthand study of the area reveals an almost entirely untouched canyon in a natural setting.

d. I strongly disagree with the statement in the "Solitude" section that the area does not give the visitor a feeling of vastness. Also, in this area the feeling of solitude is created by the remarkably low level of visitor use considering how close the area is to Moab. The summary statement that 6,980 acres do not meet the standard for outstanding primitive and unconfined recreation is a value judgment and I believe the analysis is incorrect. All the upper arms and much of the included mesa do, in fact, meet the standard. Outstanding opportunities are affected by the relatively accessible nature of the area.

**56.28 RESPONSE:** See the responses to Specific Comments 26.51, 56.12, and 56.23 and General Comment 2.12.

**56.29 COMMENT:** Mill Creek Canyon WSA has moderate wilderness-quality values and high conflicts compared with the other WSAs in the region. Conflicts include a moderate potential for potash, uranium/vanadium, and petroleum; grazing; and future vegetation manipulation for wildlife. It is suggested that some management designation be studied to protect the unique perennial stream in the WSA. [State of Utah]

**56.29 RESPONSE:** See the response to General Comment 3.16.

**56.30 COMMENT:** For Mill Creek, the EIS states that "overall there would be no significant changes in current trends of population, employment, and local income distribution" with wilderness designation. It also states that the "Potential for mineral production is only moderate", and there would be "an undetermined increase in primitive recreational use . . . 291 percent over the area's current estimated" use. It is also stated that since there are other ORV play areas in the vicinity of the WSA, ORV use would not be adversely affected. What reasons could possibly be left to exclude this area from wilderness?!! The political clout of several county commissioners seems to be the only stumbling block to designating both areas as wilderness. The statement that "commercial outfitting would not benefit from wilderness designation" is false. As admitted for the Negro Bill EIS, "designation could lead to more commercial recreational use in the WSA." Why wouldn't the same be true of the Mill Creek area? Outfitters would definitely benefit from being able to advertise that they take people into a "wilderness area" rather than just another area crisscrossed with roads and drill pads. This is not to mention all the free advertising Moab will receive from having wilderness areas so close by. As the masses of U.S. citizens grow tired of cities, they will flock in ever-increasing numbers to nonindustrialized areas. Moab can be one of these areas if we protect the land now. If, in the future, we REALLY need the low-to-moderate minerals from Mill Creek and Negro Bill, they will still be there and available. Minerals in scenically spectacular areas should be developed last, as a last resort only. [Tim Graham]

**56.30 RESPONSE:** See the response to Specific Comment 56.12. The text on commercial outfitting for the Mill Creek WSA has been revised.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 56: MILL CREEK CANYON WSA (CONTINUED)**

**56.31 COMMENT:** In the Draft EIS, page 11, paragraph 7, the third sentence "About 6,274 acres . . ." is confusing. [State of Utah]

**56.31 RESPONSE:** The sentence referred to in the Draft EIS contained a typographical error and should have been "About . . . but are open . . ." The Final EIS does not include this sentence.

**56.32 COMMENT:** Even though Millcreek Canyon (WSA #56) is only 9,780 acres and only has a small deer herd population, the "No Action" Alternative may represent Utah BLM position on particularly controversial development areas. In Millcreek Canyon, 5,580 acres was identified as crucial deer winter habitat (p.13). Within this 5,580 acres, 815 acres or 628 acres of riparian habitat was projected as potentially adversely impacted by surface disturbing activities. Even though the total area represented an implied minor impact of 13 percent (p.19), crucial habitat is involved. In this case, the impact of potential development would result in total annihilation of the small deer herd on the range. With a Category 1 (standard stipulation) within this area, it is clear the total disruption of wildlife population levels, even on critical range, is acceptable to most development objectives. At a minimum, special stipulations protecting winter wildlife habitat use integrity should have been stipulated. [Utah Wildlife Federation]

**56.32 RESPONSE:** The Final EIS notes that 1,750 acres of the WSA would be in leasing Category 3 (no surface occupancy). This would protect wildlife in the WSA.

**SECTION 57**  
**NEGRO BILL CANYON WSA**

**57.1 COMMENT:** Ignoring the IBLA decision on the inventory of this area, BLM misinterprets the unit configuration to assess solitude. The configuration is the result of violations in the inventory. BLM incorrectly eliminated large natural areas from wilderness study. Even with the present unit configuration, wilderness-grade solitude can be found. BLM incorrectly requires a width of no less than 0.5 mile throughout the area to have wilderness-grade solitude. BLM mentions that in one case the unit is 0.25 mile wide. At the end of the second inventory, BLM cherry-stemmed a vehicle way (that is incorrect in itself) down into the area. This left the width of the area

almost 0.75 of a mile at this point. BLM has changed the boundary without any authorization. We request that BLM correct this violation of the process of modifying boundaries without public comment and justification. [Utah Wilderness Coalition]

**57.1 RESPONSE:** See the responses to General Comments 2.3 and 3.1.

**57.2 COMMENT:** One of the issues needing attention is consideration of wilderness designation of a larger area outside the present WSA. This larger area, including the upper part of the mesa north of Negro Bill Canyon is bounded by the paved highway on the northwest and north and by the bottom of the Porcupine Rim to the northeast. This area also includes the sandstone fins containing the slickrock trail just to the west of the mouth of Negro Bill Canyon. [Utah Wilderness Coalition]

**57.2 RESPONSE:** The inventory process has been completed. See the response to General Comment 3.1.

**57.3 COMMENT:** A Partial Wilderness Alternative should have been analyzed for Negro Bill Canyon. I believe that portions of this area deserve wilderness protection but acknowledge that there are a few perimeter areas where potential conflicts exist. I have hiked this canyon and consider the upper portions to offer outstanding wilderness values. [John Veranth]

**57.3 RESPONSE:** The concept of a Partial Wilderness Alternative was considered during the analysis of public comments on the Draft EIS. Such an alternative was not formulated because of the change in BLM's Proposed Action to the All Wilderness Alternative in the Final EIS.

**57.4 COMMENT:** State lands found within other WSAs recommended for wilderness designation are not found to be a management problem. These lands, as with the State lands within Negro Bill Canyon WSA, are now proposed to be exchanged. Access to State lands is required but not limited to destructive road access. Access under law can be managed to protect wilderness values. The legality of access to State lands while still protecting wilderness values was strongly decided in the Cotter Corporation vs. Interior Department suit concerning mineral exploration to State lands in the Dirty Devil Canyon. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

**57.4 RESPONSE:** There are no State lands within the WSA; however four State in-holdings border the unit on the north and south. In addition, the State has changed its position on exchange of State sections (see Chapter 1 in Volume I), consequently, it now is assumed in the Final EIS that no acquisition of State lands would occur for any WSA. The comment is correct in that access to in-held State sections legally would be required if needed; however, BLM would limit that access to minimize impairment to natural values.

**57.5 COMMENT:** Many people have supported this area in the past. This has occurred despite Grand County's attempts to destroy this area. BLM should remember that Grand County's actions were very unpopular and eventually forced them to stop. The UWC's proposal would protect the scenic confluence of Negro Bill Canyon Creek and the Colorado River. This location is an outstanding area for natural beauty. Additional areas in this WSA and the immediate surrounding BLM lands possess spectacular deep canyon scenery which excites visitors year after year. [Sierra Club, Cache Group]

**57.5 RESPONSE:** The EIS describes the scenic attributes of the WSA. The UWC proposal includes areas outside of the WSA that are no longer under consideration as part of BLM's wilderness study. See the response to General Comment 3.1.

**57.6 COMMENT:** This is another WSA where a "no wilderness" decision was made before the area was even studied for wilderness values; therefore, the wilderness values had to be downgraded to meet the "no action" decision. The area on the north side of the canyon is virtually inaccessible, yet it is claimed to lack solitude. I've driven the jeep trail that provides access to that area and it is rarely used because it is extremely rough. It does not detract from the solitude of the WSA. The Special Features section should include the spectacular panoramic views of southeastern Utah. The All Wilderness Alternative should be the preferred alternative. [Owen Severance]

**57.6 RESPONSE:** BLM's Proposed Action in the Final EIS is the All Wilderness Alternative.

**57.7 COMMENT:** The only anti-wilderness statement is the "hint" that commercial outfitting would benefit from vehicular access to the area. The consideration of benefiting local jeep tour companies does not justify denying wilderness protection to this nat-

ural area. ORV "play" activities in this area would be harmful to the riparian ecosystem, and seriously degrade the solitude and naturalness. The same argument applies to Negro Bill Canyon WSA. There are no resource conflicts present, and the WSA is an outstanding natural recreation area. Allowing ORVs into this area is also harmful to the very qualities which make the WSA attractive as a natural recreation area: quietness, naturalness, and the riparian ecosystem. Both of these areas should be recommended for wilderness designation; especially since it is possible to travel up into one canyon and exit from the other. It is widely known among the wilderness cognoscenti, that in the past, county officials drove bulldozers into both of these WSAs (with impunity) to demonstrate their disapproval of wilderness. The insular attitudes of a few who believe they will benefit economically by nonwilderness, should not take precedence over national and Statewide interests to preserve these areas. BLM should stand firm on the issue of wilderness and impartially follow the legal guidelines of the 1964 Wilderness Act. Under these guidelines, Negro Bill and Mill Creek Canyons would both certainly become wilderness areas. [Martin Barth]

**57.7 RESPONSE:** BLM's Proposed Action for both WSAs is the All Wilderness Alternative.

**57.8 COMMENT:** I am disturbed that BLM proposed no action for Mill Creek and Negro Bill Canyons. The Draft EIS offers no convincing reasons for excluding these areas. No significant resource conflicts exist. (Mill Creek: gas and oil and mining potential are low; there would be little effect on grazing. Negro Bill: moderate probability of mineral development; mineral resources are not known to have been recovered.) Yet both areas are described as riparian habitats with a diversity of wildlife and outstanding opportunities for recreation and solitude. Both are currently used primarily for recreation. It seems that the no action proposal is simply a recreation to local political pressure. [Thea Nordling]

**57.8 RESPONSE:** See the response to Specific Comment 57.6.

**57.9 COMMENT:** Definition of the unit boundary is not an insoluble problem. The present boundary follows State section and township lines distant from the nearest outside human impact. If these boundaries were expanded to include all the natural area surrounding Negro Bill Canyon as required by the inventory policy, the boundary definition would be more

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

easily determined on the ground. BLM presents no documented procedure to establish the wilderness boundary definition. BLM argues that 13 miles of boundary will need to be marked. In other wilderness proposals, this has not been an issue. BLM appears to be generating unrealistic requirements not found necessary in other wilderness designation recommendations. Lastly, BLM's analysis guidelines assume that they will have the resources to accomplish this. The area needs to be managed to protect the wilderness values and boundary markers or barriers are needed to meet specific situations affecting wilderness management. [Utah Wilderness Coalition]

**57.9 RESPONSE:** See the responses to General Comments 3.1 and 3.43.

**57.10 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work and perhaps, exploratory drilling to determine if such deposits do exist, and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which led us to this recommendation. [Exxon Corporation]

**57.10 RESPONSE:** See the responses to General Comments 15.1, 15.3, and 15.13.

**57.11 COMMENT:** This popular area is deleted from wilderness recommendation because of oil/gas potential. The problem is that Grand Country's Master Plan wants mineral development and a continuation of present uses. Unconstrained development will, by its nature, impair the scenic, wildlife, and recreation values of this resource. I am afraid that the Grand County Commission will only learn this lesson the hard way -- after the damage has been done. BLM should not give into this pressure. This is a fine area near Moab, popular with local people as well as tourists. The leasers should look to attempting to develop their wells outside this study area. [Jean Soko]

**57.11 RESPONSE:** See the response to Specific Comment 57.6.

**57.12 COMMENT:** We examined drilling records in the vicinity of three representative WSAs to determine whether the SAI ratings themselves were reasonable. The utter lack of significant discoveries strongly suggests that the favorability ratings for these areas are too high, and hence are suspect for other areas as well. Our assessment focused on the Negro Bill Canyon, Mill Creek, and Behind the Rocks WSAs near Moab. The EIS states that "the potential for oil and gas within the Behind the Rocks WSA is believed to be moderate (f3) for Mississippian-aged rocks and lower for Pennsylvanian-aged rocks." Similar statements are made for Mill Creek and Negro Bill. The Draft EIS further states that the best potential is in Mississippian-aged strata. This potential is based partially on the structural similarity of the WSAs to the Lisbon Valley area and partially on the proximity of past producing reservoirs in the Big Flat area. However, the Big Flat field was rapidly depleted and most authors agree that the Lisbon field is one of a kind; generalizations from these fields are not appropriate. Over 70 wells have been drilled between and around the three WSAs within a radius of about 15 miles of the center of the three areas (see figure). Nearly half of the wells (35) tested Mississippian or older strata. Nine wells produced some oil, but only two are producing today. None of the 70+ wells had significant shows in or produced from Mississippian-aged rock. The nearest wells with good shows or production are all 5 miles or more west or southwest of the Behind the Rocks WSA. Each of these wells produced from or had shows in Pennsylvanian-aged strata. The three WSAs were rated f3 based on the potential of the Mississippian limestones; however, none of the 70+ wells had shows, much less production, from the Mississippian. Therefore, based on actual drilling, the ratings appear to be high for these WSAs. To the extent that other WSAs are subject to similar discrepancies between the SAI ratings and actual drilling records, they should be revised as well. [Utah Wilderness Coalition]

**57.12 RESPONSE:** See the responses to Specific Comments 55.9, 55.10, and 56.17.

**57.13 COMMENT:** Approximately 45 percent of the WSA is covered by 185 pre-FLPMA mining claims holding the right of access and development. Sixty-two percent (of the oil and gas leases) are pre-

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

FLPMA leases carrying valid existing rights of access, exploration, and production. BLM says that these claims and leases would create wilderness manageability problems. FLPMA states that mining and oil and gas actions can continue in the same manner and degree that occurred prior to 1976. Those actions have not significantly disturbed the wilderness character of this area. The wilderness management policy clearly makes management of these claims and leases possible within wilderness areas preventing degradation of wilderness values. BLM was asked to raise legal authority refuting FLPMA and the wilderness management policy. No information supporting BLM's claim of management problems or pre-FLPMA claims has been provided. [Utah Wilderness Coalition]

**57.13 RESPONSE:** See the responses to Specific Comments 56.13, 56.18, and 56.19. The Final EIS does not identify any significant manageability problems with the Mill Creek Canyon and the Negro Bill WSAs. Also, see the responses to General Comments 1.13 and 3.11. Grandfathered uses and valid rights may be developed in wilderness areas under unnecessary and undue degradation guidelines, and wilderness values may be impaired.

**57.14 COMMENT:** The Draft EIS states that the WSA is moderately favorable for the development of oil and gas, potash, and uranium. Here BLM grossly distorts existing evidence. None of these mineral resources presents a serious conflict preventing wilderness designation. The limitations of the mineral rating system can be seen in this WSA. The mineral ratings only begin to assess mineral value. The ratings are limited to estimating the presence, and these ratings do not represent estimates of the commercial development potential. The availability of other areas for potash production to meet future needs is not discussed. The ability to extract the potash by solution mining outside the WSA (as under Dead Horse Point State Park) without disturbing wilderness values should be considered. Lastly, the depth of salt invasions into the possible potash beds makes commercial development within Negro Bill Canyon unlikely. Uranium deposits are even less likely to be important. Deposits of uranium and vanadium are limited to small, deep concentrations within sediment variations (such as organic material concentrations). Commercial development of these small pockets of ore requires surface access to the ore body. This is not possible with this formation. BLM ignored the recent illegal post-FLPMA uranium exploration and past exploration in assessing this mineral potential. BLM has overrated the poten-

tial for uranium deposits and has ignored development considerations in assessing the magnitude of the conflict uranium mining would pose. Oil and gas are also overrated. The evidence from more than 15 wells drilled near the unit, including two recently completed, show no evidence of commercial quantities of either oil or gas. To arrive at BLM's rating of f3, the area would need to have the likelihood of producing between 10 and 50 million barrels of recoverable oil or gas equivalent. The extensive exploration is definite evidence that a deposit this size is unlikely to occur in this area. The DOE report maintains that this estimate based upon the Lisbon field is "a one-of-a-kind" and is unlikely to be found again. [Utah Wilderness Coalition]

**57.14 RESPONSE:** In the Final EIS, it is predicted that potash would not be mined or marketed from the WSA with either the wilderness or nonwilderness alternative. With no wilderness, there is potential for oil and gas exploration to occur; but commercial production is not predicted in the foreseeable future. Nevertheless, BLM geologic analysis of favorability (f3) is based on reasonable interpretation of existing data and the favorability rating remains unchanged. See the responses to Specific Comments 55.9, 55.10, 56.18, and 56.19 and General Comments 9.10, 15.11, and 15.20.

**57.15 COMMENT:** If "the structural and stratigraphic setting is similar to Lisbon Valley," the potential for uranium may be even greater than the f3 rating would indicate. More study of the area is needed. [State of Utah]

**57.15 RESPONSE:** Sufficient data is available to support the EIS rating of f3 for uranium.

**57.16 COMMENT:** Negro Bill is assigned an "Overall Importance Rating" of 3 by SAI. This is based upon ratings for uranium (f3/c2), oil and gas (f3/c2), and potash (f3/c3). No historic production has ever come from Negro Bill for any of these three resources. The OIR rating of 3 assigned by SAI to Negro Bill should be adjusted downward for all three "resources" based on the problems of access, steep topography, depth to potential deposits, current and likely future market conditions, and the existence of other more abundant, higher quality resources elsewhere. With 11 existing leases, no oil and gas has ever been shown or produced from the WSA. SAI's analysis is admittedly highly speculative and based upon the extrapolation of trends, no fieldwork. Given the costs of exploration

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

and the existence of much more promising localities, it is unlikely that oil and gas development will ever occur. The potash deposits below 7,000 feet will never be developed with high-grade, near surface deposits elsewhere. Uranium shows only slight favorability at depth and does not exist as a potential resource in any event.

The sole basis for BLM's No Wilderness Proposed Action appears to be the SAI OIR rating. This conclusion on the part of BLM prior to USGS field work is unsupported and should be rescinded. The SAI conclusion is based upon a cursory literature search and is unsupported by any real geologic data. In any case, the Geological Survey, not BLM, is the agency with the competence to make this decision. [Roy Young]

**57.16 RESPONSE:** See the response to Specific Comment 56.22.

**57.17 COMMENT:** Riparian habitat is mentioned here but specific impacts are not detailed. They should be described. [Scott Mills]

**57.17 RESPONSE:** The EIS indicates that riparian vegetation occurs in the WSA. Specific impacts are not described because it is not considered to be a significant issue. Riparian values would remain relatively unaffected by either alternative. Also, see the response to Specific Comment 56.16.

**57.18 COMMENT:** A newly established population of desert bighorn sheep in Arches National Park will likely expand to inhabit Negro Bill Canyon WSA. [State of Utah]

**57.18 RESPONSE:** It is possible that if the bighorn sheep population expands, some of the animals may leave the National Park. Most likely, they would move to the north and east from the park. It is unknown if they would migrate across the Colorado River and adjacent road to enter the Negro Bill Canyon WSA.

**57.19 COMMENT:** Criteria 1 (C) and (D) are not discussed at all! 1 (C) Multiple Resource Benefits from wilderness designation should have looked at the preservation of the riparian ecosystem in the lower 1.5 miles of the canyon which is being destroyed by ORV use. It could have discussed the unique laboratory for the observation and study of desert wildlife which this canyon represents. 1(D) could have looked at: (1) the uniqueness of Negro Bill and its addition to the diversity of the wilderness system. No other areas off-

er such outstanding ecosystem and terrain features in such a small area; (2) the need for each access to a quality area less than one day's drive from Denver, Salt Lake, and Grand Junction; and (3) the need for wilderness along the Colorado River on the Utah/Colorado border. The only area before this is Westwater Canyon which offers much harder access. [Roy Young]

**57.19 RESPONSE:** The function of the EIS is to provide environmental data and impact analysis; it is not intended to specifically address the wilderness study criteria. Those criteria will be specifically addressed in the separate wilderness study reports, prepared subsequent to the EIS.

**57.20 COMMENT:** One thing in the EIS that is in error is where it says that the Little Creek has been used as an area for cattle. Now, we had to do almost some mountain climbing to get into it. We did find one area -- one place where we could do it just by a few scrambles, but no cattle could have gotten into there. And no cattle can certainly come from Mill Creek into it, because it's a big boulder field at the bottom of it. And Little Creek is a tiny little microcosm. [Wasatch Mountain Club]

**57.20 RESPONSE:** The EIS does not specifically mention cattle in Little Creek. The EIS states that the lower 2.5 miles of Negro Bill Canyon are excluded from grazing and that cattle do not make extensive use of the WSA because of inaccessibility, lack of water, and poor quality forage.

**57.21 COMMENT:** This delightful, modest area is handy to the busy urbanite as well as the Grand County locals who have enjoyed it for decades. It is modest and moderate throughout much of its area, and while not saying it doesn't have its magnificent topographic relief, it is still ideally enjoyed by young children, the old, and the infirmed who can easily enjoy the pristine respite from the hustle and bustle of civilization, including the nearby tourist town of Moab. For scenery, wildflowers, geology in action, photography, and enjoyment of wildlife, this area is ideally situated to introduce any novice to wilderness, and to refresh easily the most jaded adventurer. Only a misguided, uninformed person could fail to see how the community will benefit economically from having such a handy attraction in its back yard. The county has much to gain from marketing itself as being surrounded by such wonders as Westwater Canyon, Behind the Rocks, and Negro Bill Canyon, and will

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

surely enjoy benefits already reaped by other communities situated near equally popular wilderness areas. Wilderness designation increases visitation and tourists. Unlike uranium, these are a renewable resource. [Linelle Wagner]

**57.21 RESPONSE:** The Final EIS describes the management and recreational use of the WSA. BLM has estimated that recreational visitation would not be significantly different with any of the alternatives.

**57.22 COMMENT:** The Negro Bill and Mill Creek WSAs should be closed to motorized vehicles. [Bruce Chesler and Marilyn Peterson]

a. As resource degradation proliferates in portions of Negro Bill and Millcreek Canyons on account of vehicle entry, a restriction on motorized vehicles here would be timely. The many people who enjoy a hike or swim in these cool waters must surely agree with me on this point - that these are no places for machines.

b. This is a beautiful canyon with an interesting riparian environment and fascinating cliffs, side canyons, and avian and aquatic creatures. The area is not being adequately protected at the present time. The road that was "built" along the river bottom is disgusting to look at, particularly where it follows the creek bottom. When I was there in early August of this year, there were ugly tire tracks going in and out of the creek. And the vehicle abuse has also spread through the side canyons. In the first large canyon to the south, I found mountain bike and motorized dirt bike tracks all through the cryptogamic soils. And, of course, with ORVs there is noise. I believe that all ORV use in this area should be prohibited.

**57.22 RESPONSE:** ORV use of the canyon has essentially ceased since the installation of a hiking trail, related signs, and barriers. The canyon is recovering rapidly from damage caused by the unauthorized construction of the road on the lower portion of the area. The area is closed to ORV use under the Grand RMP.

**57.23 COMMENT:** Other wilderness activities supporting designation were ignored. Horseback riding and hunting are both outstanding in this area. Opportunities to reintroduce wildlife within a designated wilderness area was also not discussed. [Utah Wilderness Coalition]

**57.23 RESPONSE:** Horseback riding was mentioned in the Draft EIS. The Final EIS notes both horseback riding and hunting.

**57.24 COMMENT:** BLM's assessment of opportunities for solitude is not accurate. [Utah Wilderness Coalition, Wasatch Mountain Club, Randolph Jorgen, Mark Lennon, Scott Smith, and Henry Wright]

a. I visited Negro Bill Canyon and was very impressed by its opportunities for solitude. I noticed in the Draft EIS that BLM feels that only the canyon floor is suitable for wilderness on the basis of solitude. This is a highly subjective judgment and is simply not true. While the canyon floor does provide exceptional opportunities for solitude, so do the surrounding ridges, even quite close to the Sand Flats Road. I climbed from the canyon in two places, on both the east and west rims. Even though I did this on the weekend of the Moab Jeep Safari, my solitude was not disturbed.

b. We saw only one set of footprints, and they have been -- I'm sure those footprints were more than a month old. I suspect that very, very few people have actually gone down and seen that 3-mile stretch, which comes beyond Burkhalter before you get to Mill Creek. It is an absolute paradise. And we were there the day of the jeep safari. We heard not a single jeep. We were within a mile of one of the jeep roads. We were in the canyon and couldn't hear a thing. There is no reason at all, with respect to the questions of solitude, to exclude that small beautiful area. It is right in our own backyards. I think there's no reason, from the point of view of grazing, because no cattle graze there. In general, we were also in the upper reaches of the Negro Bill Canyon. And a few of us climbed up one of the side canyons that goes up onto Porcupine Rim. We were -- until we got onto the top of the rim, we again, saw no sign of the jeeps in the group. But I knew one group was going to be going on one of their tours with -- along the rim and around back. The all wilderness proposal for Negro Bill has set its boundary right up against the rim, and there's no need to do that. You could just as easily leave a passage for the jeep roads, that's within about 100 yards of the rim, and not at all impede the -- I mean both uses could be done. There's no real need for conflict there.

c. BLM errs in assessing outstanding opportunities for solitude. BLM requires dense stands of brush

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

or trees or canyon walls in order to find wilderness-grade solitude. BLM failed to consider scenic vistas found in large open natural areas, and canyon rims in assessing solitude. Adequate topographic screening outside the canyon can be found. BLM failed to consider this.

d. BLM has failed to properly judge the amount of solitude available. In fact, when one is in the canyon, which is where the overwhelming bulk of use is located, the sights and sounds of human activity are either invisible or inaudible. The vegetation and slickrock walls are such that human intrusions from surrounding areas are almost entirely absent, or such a minimal factor as to be totally irrelevant. BLM is establishing an unrealistically harsh standard to disqualify the canyon from wilderness consideration. BLM has further exaggerated the seismograph line, fence, and the infamous mountain road. Both the line and road could easily be reclaimed, and the fence could easily be removed so that the entire area would meet the naturalness criterion. The fact that the road is considered a negative impact is especially outrageous considering the method of its placement and its open intent of disqualifying a proposed wilderness area.

e. I disagree with the assertions that opportunities for solitude and for outstanding primitive and unconfined recreation are lacking in most of the unit. Opportunities for unconfined hiking, backpacking, and horseback riding exist not only in the canyon itself but also on the benchlands above. The experience of traveling up this narrow, scenic, and often verdant canyon, and then emerging onto the open benchlands above with views of surrounding mountains and down into the canyons, is most impressive.

f. Imagine my surprise after spending 3 days in Negro Bill Canyon without seeing anyone when I read that I had been experiencing both outstanding and primitive recreational opportunities and regular primitive recreational opportunities in a rather checkerboard pattern. Not having a solitude meter at the time, I was unaware of these fluctuating qualities. If anyone at BLM can tell me where I can purchase one of these I would be much obliged.

**57.24 RESPONSE:** BLM has determined that only part of the Negro Bill WSA has outstanding opportunities for solitude. The term "outstanding" indicates that there are different levels in opportunities for solitude within a geographic region; the emphasis in solitude determinations is on the opportunities a per-

son has to avoid the sights, sounds, and evidence of other people within the WSA. Although some subjectivity is involved, objective features of the WSA were considered in rating the opportunities for solitude. These features include size and configuration of the area, topographic and vegetative screening, and the presence of outside sights and sounds. Had other visitors been in the WSA at the same time as the commentator, the lack of screening would have subjected him to more frequent encounters with sights, sounds, and evidence of other people in these portions of the WSA that lack outstanding opportunities for solitude. Also, see the responses to General Comments 2.13, 22.3, and 22.5.

**57.25 COMMENT:** And what makes these lands more special is their proximity to Moab. One could be moments away from a special wilderness retreat while residing in or visiting Moab. I think this is an important fact not brought forth in the Draft EIS. The ease of access into these canyons. [Mark Chesler]

**57.25 RESPONSE:** The short travel distance and access from Moab to the WSA are described in the EIS. Local school groups frequently come to the canyon for environmental awareness studies.

**57.26 COMMENT:** Neither FLPMA or the Wilderness Study Policy requires that there be more than 5,000 acres of outstanding opportunities for wilderness activities or solitude. In using this argument to drop this area from designation, BLM violates the Wilderness Study Policy. BLM uses conflicting arguments which demonstrate their bias against wilderness in this area. In this area's description, BLM claims that the narrowness of the canyon can detract from the solitude when many people are in the area by limiting their opportunity to avoid each other. BLM incorrectly downrates this area even though it has rugged narrow canyons that BLM requires to meet its solitude standard. BLM then turns around to say that the numerous sandstone fins on the benches also lack solitude and that while topographic screening is provided, it is less than outstanding. By using an unreported method to determine the adequacy of screening and not documenting its application, BLM has arbitrarily concluded the solitude is less than outstanding. The evidence presented clearly refutes this. Much of the terrain found in Negro Bill Canyon is similar to that in Behind the Rocks, yet the conclusions are radically inconsistent. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

**57.26 RESPONSE:** BLM's Proposed Action in the Final EIS is the All Wilderness Alternative for both Negro Bill Canyon WSA and Behind the Rocks WSA. Also see General Comment Responses 2.12, 2.13, 22.3 and 22.5.

**57.27 COMMENT:** Under BLM's Wilderness Study Policy criteria: Criteria 1 Wilderness Values A. Mandatory Wilderness Characteristics: Negro Bill qualifies in all areas. I have visited Negro Bill on numerous occasions. During a 5-day period from May 25 to 29, 1985, just prior to Memorial Day, I saw no one in the upper canyon or the high slick rock above the canyon walls. This is despite the gathering of about 100 members and their ORVs of the High Country 4-Wheel Drive Club from Colorado at the mouth of the canyon. This area is superb for solitude and primitive recreation. I sharply disagree with BLM's assertion that 6,245 acres in the WSA (more than 80 percent) "does not meet the outstanding criterion for solitude." The discussion on Primitive and Unconfined Recreation offers 53 words on photography and the popularity of horseback riding, and then concludes in summary that "5,320 acres of the WSA do not meet the standard" for primitive and unconfined recreation! Similarly, the 40 words devoted to Criterion 1 (B.) on "Special Features" devote one sentence each to the easy accessibility of this uniquely wild and beautiful area and to the unique riparian ecosystem it contains. The sheer, high walls with their color and patterns, and Morning Glory Arch, are not mentioned. [Roy Young]

**57.27 RESPONSE:** See the responses to Specific Comments 57.19 and 57.22. Morning Glory Arch, a destination for hikers, is located on State land adjacent to the WSA.

**57.28 COMMENT:** BLM should consider and explain alternate designations for the Negro Bill Canyon WSA. [State of Utah and Utah Wilderness Coalition]

a. Negro Bill Canyon has relatively low wilderness quality values and the highest degree of conflict compared to the other WSAs in the region. There are some special features in the area accessible only through the WSA (e.g., Morning Glory Natural Bridge). Conflicts include a moderate potential for oil and gas, uranium/vanadium, potash, and water resource development. The Grand RMP recommends part of the WSA for Outstanding Natural Area management rather than wilderness. This would allow for protective management of the WSA's unique wilder-

ness resources, while allowing other nonwilderness uses in the parts not designated on ONA.

b. The designation of a portion of the area as an outstanding natural area presents several issues. BLM maintains that they have management problems protecting wilderness values in a designated wilderness area. Yet BLM contends that protecting the same values in the ONA is possible and more discussion is "not applicable" to the wilderness study. The issue of management of nonwilderness lands is significant and needs complete consideration. What legal authority exists? What management is specified? What mitigating measures will be enacted? What resources are available to enforce this management?

**57.28 RESPONSE:** BLM intends to implement the outstanding natural area designation by renaming it (in accordance with policies issued subsequent to the completion of the Grand RMP) as an Area of Critical Environmental Concern (ACEC). A specific ACEC management plan will be prepared to define provisions for special management of natural values. An ACEC is not the same as wilderness designation. This is explained in the EIS. The area would be manageable as an ACEC and as wilderness. Also, see the response to General Comment 3.16.

**57.29 COMMENT:** The fact that there are no State lands within the WSA does not mean that there is no interaction with State plans. Mineral withdrawals may affect adjacent lands. [State of Utah]

**57.29 RESPONSE:** A road currently exists to all four State sections outside the north and south boundaries of the WSA. Access to and mineral use of these State sections would not be affected by wilderness designation of the Negro Bill Canyon WSA.

**57.30 COMMENT:** For Mill Creek, the EIS states that "overall there would be no significant changes in current trends of population, employment, and local income distribution" with wilderness designation. It also states that the "Potential for mineral production is only moderate," and there would be "an undetermined increase in primitive recreational use . . . 291 percent over the area's current estimated" use. It is also stated that since there are other ORV play areas in the vicinity of the WSA, ORV use would not be adversely affected. What reasons could possibly be left to exclude this area from wilderness?!! The political clout of several county commissioners seems to be the only stumbling block to designating both areas as



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 57: NEGRO BILL CANYON WSA (CONTINUED)**

wilderness. The statement (Mill Creek EIS) that "commercial outfitting would not benefit from wilderness designation" is false. As admitted for the Negro Bill EIS, "designation could lead to more commercial recreational use in the WSA." Why wouldn't the same be true of the Mill Creek area? Outfitters would definitely benefit from being able to advertise that they take people into a "wilderness area" rather than just another area criss-crossed with roads and drill pads. This is not to mention all the free advertising Moab will receive from having wilderness areas so close by. As the masses of U.S. citizens grow tired of cities, they will flock in ever-increasing numbers to nonindustrialized areas. Moab can be one of these areas if we protect the land now. If, in the future, we really need the low-to-moderate minerals from Mill Creek and Negro Bill, they will still be there and available. Minerals in scenically spectacular areas should be developed last, as a last resort only. [Tim Graham]

**57.30 RESPONSE:** See the response to Specific Comment 56.30. The text for commercial outfitting has been revised.

**SECTION 58**  
**HORSESHOE CANYON (NORTH) WSA**

**58.1 COMMENT:** We feel that this area should be considered as a part of a larger Labyrinth Canyon wilderness complex as proposed by the Utah Wilderness Coalition. [Sierra Club, Cache Group]

**58.1 RESPONSE:** See the responses to General Comments 3.1 and 3.7.

**58.2 COMMENT:** In Labyrinth Canyon, BLM fragmented the WSA by saying the river divided it, and a river is a road. This justification is pure insanity. The Colorado River through the Grand Canyon carries motorized boats, yet is not legally a road. Neither is Yellowstone Lake in Yellowstone National Park, or Jenny Lake in Grand Teton. [Valerie Cohen]

**58.2 RESPONSE:** See the response to General Comment 4.6.

**58.3 COMMENT:** The area has unique topography that clearly qualifies it for complete wilderness designation. [Sierra Club, Cache Group]

**58.3 RESPONSE:** Unique topography is a special feature that does not necessarily qualify an area for wilderness designation. An area qualifies as wilderness if it contains the mandatory wilderness characteristics.

**58.4 COMMENT:** The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions. Future mineral production could be hindered by regulation of water running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation. [Emery County]

**58.4 RESPONSE:** See the responses to General Comments 10.3 and 14.23.

**58.5 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. Accordingly, I submit to you a copy of our (Emery County) resolution concerning Federal reserve water rights. [Emery County]

**58.5 RESPONSE:** See the responses to General Comments 14.8 and 14.16.

**58.6 COMMENT:** Being that the San Rafael and the tributaries to the San Rafael are major contributors to the Colorado River salinity problem, we are concerned with what measures might be taken if downstream areas are designated wilderness. [Emery County]

**58.6 RESPONSE:** See the response to General Comment 14.14. Drainages in the Horseshoe Canyon (North) WSA are tributary to the Green River rather than the San Rafael River.

**58.7 COMMENT:** The OIR (3) is probably overstated, since it obviously reflects the f4 rating for hydropower which is highly unlikely to ever be developed. [Utah Wilderness Association]

**58.7 RESPONSE:** See the response to General Comment 15.7. The OIR has not been used in the Final EIS. The EIS indicates that potential dams affecting the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 58: HORSESHOE CANYON (NORTH) WSA (CONTINUED)**

Horseshoe Canyon (North) WSA are not expected to be constructed.

**58.8 COMMENT:** Surface-disturbing activities related to locatable mineral development under "undue/unnecessary" guidelines, oil and gas development with Category 1 stipulations, ORV use, and new vehicle roads. The National Park Service has found that these activities would severely impair the many special features found in their portion of Horseshoe Canyon. In implementing the development stipulations, BLM has a long history of requiring resource protection as long as it presents no burden to the operator. If the operator doesn't follow these stipulations, BLM has not forced compliance. Wilderness designation would be action-forcing, leading to BLM requiring compliance with resource protection policy. The EIS needs to specifically detail each resource, the required protection, and the benefits received under the protection of wilderness. [Utah Wilderness Coalition]

**58.8 RESPONSE:** See the response to Specific Comment 39.15.

**58.9 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The northeast portion of Garfield County and the eastern portions of Wayne and Emery Counties, WSAs numbered 38 through 41, 58, 59 and 64, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic and Mesozoic age rocks. [Texaco, Inc.]

**58.9 RESPONSE:** See the response to Specific Comment 39.16.

**58.10 COMMENT:** In the section on Geology, there is not enough geologic information from which to predict economic potential. Again, this is a geomorphic rather than a geological overview. [State of Utah]

**58.10 RESPONSE:** See the response to Specific Comment 36.15.

**58.11 COMMENT:** Regarding the unitized pre-FLPMA leases covering 76 percent of the North WSA: is oil or gas being produced anywhere on the unitized lease? If not, what is the expiration date for the unitized lease? Since the unitized lease will protect existing exploration rights, the oil and gas potential, whether high or low, should not be used as a reason against wilderness designation. [John Veranth]

**58.11 RESPONSE:** There are no leases in the Horseshoe Canyon (North) WSA. BLM's Proposed Action in both the Draft and Final EIS is the All Wilderness Alternative.

**58.12 COMMENT:** Your document on the WSA states that "No cultural sites within the WSA have been formally recorded." I find that statement quite puzzling. A book entitled "The Fremont Culture" by Gunnerson, 1969, contains a report of the Claflin-Emerson expedition of 1927. In that report, on page 163, mention is made of a site designated SR8-1. The site mentioned was found at the mouth of Horseshoe Canyon. The site contained four structures and a pictograph panel. To the south of the structures, a petroglyph panel was found. In my explorations of the WSA, I have found a habitation site with structure approximately four miles upstream of the mouth, and several lithic scatter sites in Horseshoe Canyon. In Keg Spring Canyon I found four habitation sites in caves, a petroglyph panel, and several lithic scatter sites. I fully agree with your assessment that ". . . the potential for finding significant sites is considered high." Clearly the Horseshoe Canyon (North) WSA deserves maximum protection. [Gary Cox]

**58.12 RESPONSE:** The narrative on cultural resources has been revised to include additional information.

**58.13 COMMENT:** This WSA contains numerous archeological and historical sites that should be protected from theft, vandalism, and development through wilderness designation as proposed by the Utah Wilderness Coalition. [Sierra Club, Cache Group]

**58.13 RESPONSE:** See the response to Specific Comment 39.24.

**58.14 COMMENT:** Important fossils of mammoths are found here. These are among the oldest and richest examples of prehistoric mammals to be found in Utah. [Sierra Club, Cache Group]

**58.14 RESPONSE:** See the response to Specific Comment 39.20. The mammoth referred to in the comments are associated with caves in the Horseshoe Canyon (South) rather than Horseshoe Canyon (North) WSA.

**58.15 COMMENT:** The Horseshoe Canyon (North) WSA is one of the most hauntingly beautiful areas. This lovely oasis has an abundant flow of water, thick

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 58: HORSESHOE CANYON (NORTH) WSA (CONTINUED)**

vegetation, huge pools, and is teeming with wildlife including dam building beavers, mule deer, and a huge variety of birds including golden eagles, prairie falcons and possible peregrine falcons. The towering sheer walls, and massive spires and monuments render this section of Horseshoe Canyon overwhelmingly majestic. [Gary Cox]

**58.15 RESPONSE:** BLM has rated the entire WSA as Class A scenery. The EIS summarizes the scenic and wildlife attributes of the WSA.

**58.16 COMMENT:** Establishment of Horseshoe Canyon (North) WSA as wilderness would be compatible with NPS management objectives in the adjacent Horseshoe Canyon unit of Canyonlands National Park. Combining this unit with Horseshoe Canyon (South) and Canyonlands will provide an exceptional canyon hiking experience and opportunity to protect and view numerous archeological resources. There is perennial water available in Horseshoe Canyon (North) which enhances the recreational opportunities, but also supports a great diversity of wildlife and lush riparian vegetation in spots. The Labyrinth Canyon from Green River to Mineral Bottom or through Canyonlands National Park is a popular flat-water river trip for both motorized and nonmotorized water craft. Establishing wilderness along this canyon's banks will enhance recreational opportunities for river users and assure long-term protection of this area. [National Park Service]

**58.16 RESPONSE:** The EIS notes the compatibility of wilderness designation between Horseshoe Canyon (North) WSA and the Horseshoe Canyon unit of Canyonlands National Park.

**58.17 COMMENT:** The WSA is an important component of the Horseshoe Canyon Wilderness Complex (Horse Canyon North and South WSAs and the Canyonlands National Park extension), and has always had broad support for wilderness. It has even had the support of Emery County. [Utah Wilderness Association]

**58.17 RESPONSE:** The Emery County letter of comment on the Draft EIS did not indicate support for the Horseshoe Canyon (North) WSA.

**58.18 COMMENT:** The Recreation section should consider that at least two access points exist from the mesa top into the WSA near the junction of Horseshoe Canyon with the Green River. These routes are not marked and are difficult to find but they provide a

route from the jeep road into the canyon. [John Veranth]

**58.18 RESPONSE:** Mention of the two access points has been added to the EIS narrative.

**58.19 COMMENT:** "Wilderness designation could provide minor benefits to seven other resources." In a consistent pattern used by BLM, multiple use benefits in wilderness areas are underestimated. [Utah Wilderness Coalition]

**58.19 RESPONSE:** See the responses to General Comments 1.2 and 22.1.

**58.20 COMMENT:** Horseshoe Canyon (North) WSA has high wilderness-quality values and high conflicts within the region. There are significant conflicts with minerals (a moderate potential for uranium/vanadium and potash), livestock use in the area, and hydropower development. There are also significant wilderness values in the WSA. Wilderness management would complement recreational use on the Green River and the Horseshoe Canyon detached unit of Canyonlands National Park, which is contiguous with the WSA in the same canyon system. [State of Utah]

**58.20 RESPONSE:** See the response to Specific Comment 58.11. BLM believes that the wilderness values outweigh the other potential resource uses. The rationale is summarized in Appendix 11 of Volume I.

**58.21 COMMENT:** Regarding the unitized pre-FLPMA leases covered 76 percent of the North WSA: is oil or gas being produced anywhere on the unitized lease? If not what is the expiration date for the unitized lease? Since the unitized lease will protect existing exploration rights, the oil and gas potential whether high or low should not be used as a reason against wilderness designation. [John Veranth]

**58.21 RESPONSE:** The Horseshoe unit was terminated in 1981. No oil or gas was produced from any leases within the unit. An assessment of the mineral potential is required by Section 603 of FLPMA. The information concerning mineral potential is required to make an informed decision concerning what resources or possible resource development may be given up should an area be designated wilderness.

# SPECIFIC COMMENTS AND RESPONSES

## SECTION H: LOST SPRING CANYON WSA

### SECTION H LOST SPRING CANYON WSA

**H.1 COMMENT:** During the inventory, BLM incorrectly dropped lands that qualify for inclusion in the WSA. [National Parks Conservation Association, Utah Wilderness Coalition, and Henry W. Ramsey]

a. National park boundaries follow little logical reasoning on the eastern side of Arches National Park. Some of the same arches and canyons which justified designation of a national park also exist in the lands just east of the park, Lost Spring Canyon. Now this area is not under wilderness study because BLM made improper deletions in the inventory that reduced the area's size to less than 5,000 acres. The inventory violations include dividing the unit, conflict of interest between the wilderness coordinator and the local ORV club, and exaggerating the extent of human impacts. BLM justification uses rationale which in other areas the IBLA has found to be in error. BLM was required by the inventory policy to define inventory units to areas bounded by roads, large bodies of water, and non-BLM lands. In the case of Lost Spring Canyon (UT-60-131) and Dome Plateau (UT-060-132), all that separated these two areas abutting Arches National Park was a vehicle way on the grassy Winter Ridge. This vehicle way failed to meet BLM's requirements for classification as a road. The way did not reach the park or completely separate the two units. It stopped 2 miles short and was blocked and closed to use. It had largely revegetated on the sandy bench and was not a regularly and maintained vehicle route. Dome Plateau contains more than 20 miles of the sandstone cliffs bordering the Colorado River just as it passes by Arches National Park. Portions of this unit were initially proposed as part of that park. BLM incorrectly divided this single area and dropped Dome Plateau. BLM cited the presence of "numerous seismograph lines, access roads, mining activities, and drill locations." The entire cliff face along the Colorado and the drainages into the park are still natural. The intrusions are limited to less than 12 percent of the Dome Plateau inventory unit.

b. It is our understanding that most of the qualifying roadless area was dropped during the inventory process due to the impact of a natural gas pipeline running through the unit. This action ignores the fact that the National Park Service has determined that

the existence and maintenance of the same pipeline within Arches National Park creates no conflict with park wilderness. We are not aware of any potential resource conflicts. We ask, therefore, that BLM include a review of a 11,600-acre proposal in a supplemental Draft EIS.

c. The boundary proposed for this WSA is defective in that it excludes a small amount of adjacent and equally qualified for wilderness designation. Although the area involved is not large, it is significant, particularly in view of the small overall size of the WSA. Specifically, the northern boundary of the WSA arbitrarily follows the section lines of the public land survey, rather than a road, utility corridor, or natural feature delineating a change in the characteristics of the landscape which would affect its wilderness qualification. As a result, important connected segments of the Lost Spring Canyon system (in Sections 16 and 17 of Township 23 South, Range 22 East) have been excluded. This reduces the opportunities for solitude and primitive recreation and complicates the wilderness management problems for the remainder of the canyon system within the proposed WSA. Fish Seep Draw, in Section 16, also contains spectacular, nearly vertical slickrock walls, highly scenic and similar to the famed Narrow of the Virgin River in Zion National Park. The outstanding wilderness qualities and special geological features of this adjacent area justify its inclusion within the Lost Spring Canyon WSA, and I urge that the necessary boundary adjustments be considered in the final wilderness report and recommendation.

**H.1 RESPONSE:** See the responses to General Comments 3.1 and 3.43.

**H.2 COMMENT:** Zygadenus vaginatus is found in the WSA. [National Park Service]

**H.2 RESPONSE:** According to the FWS, this species could occur in the WSA. See Appendix 4 in Volume I.

**H.3 COMMENT:** Clover Canyon, Lost Spring Canyon, and Upper Salt Wash all drain into Salt Wash. These drainages are natural extensions of Salt Wash. Natural, unpolluted water flow is important to the ecology of Arches National Park. [National Park Service]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION H: LOST SPRING CANYON WSA (CONTINUED)**

**H.3 RESPONSE:** The relationship described in the comment has been added to the EIS text on water resources.

**H.4 COMMENT:** A newly established population of desert bighorn sheep in Arches National Park will likely expand to inhabit the WSA. [State of Utah]

**H.4 RESPONSE:** See the response to Specific Comment 57.18. The Lost Spring Canyon WSA is east of the National Park and readily could be used by bighorn sheep. This has been noted in the Final EIS.

**H.5 COMMENT:** Threatened and endangered (T&E) species are summarily dismissed. The Draft EIS notes no terrestrial T&E animal species are found in WSAs and the only nonaquatic T&E animals are migrant bald eagles and peregrine falcons. It fails to note bald eagles are not mere migrants to Westwater Canyon WSA (they are permanent residents). Only the North Horseshoe Canyon WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise, the findings on terrestrial T&E species are flawed. The FWS letter (Draft EIS, Appendix 4) indicates the black-footed ferret may inhabit several WSAs (Dirty Devil, Horseshoe Canyon North and South, Behind the Rocks, Desolation Canyon, Floy Canyon, Spruce Canyon, Flume Canyon, Westwater Canyon, Lost Spring Canyon and Daniels Canyon). It also indicates the desert tortoise may inhabit Red Mountain and Cottonwood Canyon WSA. [Utah Wilderness Association]

**H.5 RESPONSE:** The EIS description of wildlife for Lost Spring Canyon notes the potential for black-footed ferret and indicates that none have been sighted there. Also, see the response to General Comment 16.3.

**H.6 COMMENT:** Bobcat have been observed on the east and south border of the WSA. Bobcat dens have been documented in Salt Wash within Arches National Park. Bobcat utilize the WSA for hunting territory. Great horned owl and Coopers hawk nests have been observed in the WSA. [National Park Service]

**H.6 RESPONSE:** The EIS has been revised to add the species mentioned in the comment.

**H.7 COMMENT:** All of the WSA is Class A scenic quality, but BLM claims that 970 acres do not meet the outstanding solitude and primitive recreation requirement. I disagree. All of the WSA meets both re-

quirements. BLM is apparently laying the groundwork to reduce the size of the wilderness recommendation in the Final EIS. All of the WSA deserves wilderness designation because of the adjacent proposed wilderness in Arches National Park. [Owen Severance]

**H.7 RESPONSE:** Class A scenic quality is not one of the criteria for outstanding solitude. BLM field specialists familiar with the area have found that outstanding solitude is not present in all of the WSA. BLM's Proposed Action in both the Draft and Final EIS is the All Wilderness Alternative.

**H.8 COMMENT:** We suggest the EIS recognize that much of the Lost Spring Canyon WSA is visible from the Devil's Garden, an extreme high-use area and is an important viewshed to people touring Arches National Park. [National Park Service]

**H.8 RESPONSE:** The visual relationship has been added to the text of the EIS.

**H.9 COMMENT:** Arches National Park maintains documented overnight backcountry use statistics for the WSA. The area is a destination for backpackers who begin their hikes at the Wolfe Ranch within Arches National Park. [National Park Service]

**H.9 RESPONSE:** The Wolfe Ranch trailhead information has been added to the recreation section of the EIS.

**H.10 COMMENT:** In numerous trips to upper Salt Wash, Clover Canyon, and Lost Spring Canyon, rangers have not heard noise from vehicle traffic in Arches National Park. The statement that "vehicle traffic can be heard" in our experience is not accurate. [National Park Service]

**H.10 RESPONSE:** Apparently, there are times when noise is not heard and there are times when wind or other conditions carry the sound to the WSA.

**H.11 COMMENT:** The EIS should point out that this WSA is an important natural extension of Arches National Park. [National Park Service, Sierra Club, Cache Group and David W. Johnson]

a. From standpoint of visibility, geology, watershed, vegetation and wildlife, this area is a natural extension and similar to the Devils Garden wilderness proposal of Arches National Park.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION H: LOST SPRING CANYON WSA (CONTINUED)**

b. This WSA is naturally a part of Arches National Park. It is our understanding that the NPS wants to see this area protected as wilderness and maybe even added to Arches.

c. The NPS concurs with the All Wilderness proposal for Lost Spring Canyon. This WSA is one of the areas considered for possible transfer of jurisdiction to add the WSA to Arches National Park. The EIS would meet the requirement for further study called for in the Secretary's letter. At present, the Arches GMP is being revised, and the possible addition of the Lost Spring Canyon area is being evaluated as part of this planning process. NPS recommendations on this area will be made in the final Arches GMP.

d. For the Lost Spring Canyon WSA, only potential NPS wilderness is necessary to qualify Lost Spring Canyon for inclusion as wilderness.

**H.11 RESPONSE:** The EIS notes that wilderness designation of the Lost Spring Canyon WSA would complement similar values in the adjacent national park. BLM has no plans to transfer the WSA to the NPS. BLM wilderness review process is separate from any consideration of land transfers or exchanges. See the response to General Comment 3.24.

**H.12 COMMENT:** Lost Spring Canyon WSA has low wilderness-quality values and low to moderate conflicts compared to other WSAs in this region. BLM's proposed 3,880 All Wilderness Alternative would complement the values found in adjacent Arches National Park. There is, however, a potential conflict with oil and gas and potash resources. [State of Utah]

**H.12 RESPONSE:** BLM's Proposed Action is the All Wilderness Alternative. BLM believes that the likelihood of conflict with mineral potential is not significant, considering the size, location, and proximity of the WSA to the national park. In the Final EIS, it is assumed that some mineral exploration would occur in the WSA with the No Action/No Wilderness Alternative, but no commercial production is projected.

**H.13 COMMENT:** On Map 1, Section 36, Township 23 South, Range 21 East, should be identified as adjacent State land. The NPS boundary through Section 32, Township 23 South, Range 22 East is wrong. It should match Map 2. [State of Utah]

**H.13 RESPONSE:** The maps have been revised and Map 1 has been corrected.

**SECTION J**  
**SOUTH NEEDLES WSA**

The South Needles WSA was discussed with the Butler Wash WSA in the Draft EIS. Refer to the Specific Comment Response Section 52 for the Butler Wash WSA, located in proximity to the South Needles WSA.

**SECTION 59**  
**SAN RAFAEL REEF WSA**

**59.1 COMMENT:** A public hearing was held on November 13, 1985, "for the purpose of gathering public input on the wilderness designation of the San Rafael Swell area and possible alternatives to wilderness designation." At this time, I would like to submit the transcript of that hearing, for the public record. At that public hearing, a straw poll was conducted to determine which land use actions the public wished to pursue. Participants were asked to rank seven different options according to their personal preference. Each ranking was given a point value, with the first choice given seven points, and the last choice only one point. The results were as follows: The number one choice, with 584 points, was to "Put all efforts into opposing wilderness designation on the Swell." The option of supporting wilderness designation on the Swell placed sixth, with 140 points. The least preferred alternative was to support a National Park designation on the Swell. In order to represent the public interest as elected officials, the Emery County Commission issued a formal statement in which it was stated, "The Commission has concluded that it cannot support any designation upon the San Rafael Swell by any agency that would result in restrictive and exclusionary management practices beyond those practices currently employed by the Bureau of Land Management." In other words, we cannot support anything other than multiple use management of the Swell. [Emery County]

As public officials, we are obligated to represent the majority will of our county citizens. We feel we have done so in taking the position we have taken.

**59.1 RESPONSE:** The position of local governments relative to wilderness designation is presented in the Land Use Plans sections of the Final EIS.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

**59.2 COMMENT:** BLM's wilderness inventory decisions are erroneous. [Utah Wilderness Coalition]

a. In the western part of this unit, the BLM deleted approximately 30,000 acres moving the study area boundary between three and ten miles from the nearest significant impact. BLM dropped large parts of the unit that did not "include the principal interest to those supporting an intensive inventory." Large natural areas with ridges topped with pinyon forests and multiple drainages were dropped. The vehicle ways shown on the unit map were found in fieldwork to be routes with no evidence of construction and were almost completely reclaimed. BLM did not claim that all the area being dropped contained human impacts. In the initial inventory decision document, the agency did claim that they only retained the "areas of principal interest" and not all of the natural areas. As a result, the intensive inventory unit boundary follows no boundary road or series of intrusions. The boundary crosses large natural areas averaging six miles from the original unit boundary road. Vehicle ways to abandon oil well test holes west of Lone Man Butte have not seen regular use in more than a decade as vegetative evidence indicates. Slow growing scrubs and trees are growing in these vehicle ways.

b. In the intensive inventory BLM exaggerated the extent of a few intrusions to incorrectly delete more than 17,000 acres. BLM's justification uses rationale which in other areas the IBLA has found to be in error and remanded the BLM decision.

c. The area just south of I-70 has two ways that total 5.5 miles. These vehicle ways are on the ridges of canyon ways and are not now usable by vehicles since the construction of I-70 fenced them closed. These vehicle ways are dirt jeep trails less than 7 feet wide and have largely been reclaimed. They occupy a total area less than 6 acres. Yet BLM used these intrusions to drop this area of steep canyons of more than 3,000 acres based in these minor imprints. In the southwest, BLM deleted approximately 4,000 acres north of Temple Mountain. The only impacts in this portion of the unit are along a 4.5-mile way. The impact along this route that is now visible is a jeep trail mostly eroded and reclaimed. This impact occupies less than 5 total acres. BLM used this vehicle way to separate and then drop a larger area from review. In administrative appeals on other areas, this exaggeration of human impacts was found to be a serious error.

d. Along I-70, BLM said the presence of a State section of land "creates an irregular and impacted piece of land not meeting the wilderness criteria." The State section in question possesses the same wilderness characteristics as the adjacent BLM lands. This State section is proposed to be given to BLM in the State land exchange proposal (project BOLD). In other units, BLM used this same argument. In appeals on those other units, the IBLA ruled that BLM erred in using the State sections to assess wilderness values, see IBLA Decision 8. In the southwest, the BLM used a minor imprint to divide the unit with a portion now less than 5,000 acres. BLM then argued that the solitude of that isolated subunit was not adequate and dropped it. The IBLA refuted this division and deletion trick in appeals on other units.

**59.2 RESPONSE:** See the response to General Comment 3.1.

**59.3 COMMENT:** During the intensive inventory, BLM claimed that the unit was now 73,270 acres instead of 63,264 acres. The difference was never explained in a published document. [Utah Wilderness Coalition]

**59.3 RESPONSE:** The difference was due to a recalculation of the acreage in the area. There was no change in the location of the boundary on the map.

**59.4 COMMENT:** The EIS indicates that the entire WSA contains 59,170 acres. According to the Introduction, this figure actually includes lands outside the WSA. The All Wilderness Alternative also refers to the "59,170 acres of the San Rafael Reef WSA," again contradicting the reference on page 1. Size of the WSA versus that of the Proposed Action area should be clarified throughout this analysis. [State of Utah]

**59.4 RESPONSE:** BLM believes that the explanation is sufficiently clear. The EIS explains that the WSA contains 55,540 acres but the analysis includes the addition of a "variation" of 3,630 acres due to an adjustment for ease of field management. The text for the description of the alternatives explains that only the total of 59,170 is used through the analysis, for simplicity in presentation.

**59.5 COMMENT:** The San Rafael Swell should be under wilderness study protection until National Park status can be carefully analyzed. [Wendall B. Anderson and John Lockhart]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

a. I have some knowledge of the San Rafael area and am of the opinion that it merits National Park status. It should be held under wilderness study protection until National Park status can be carefully analyzed. The area should include all of the Sids Mountain and Mexican Mountain WSAs and additional wildlands, and the more developed land around the Wedge, Buckhorn Draw, and along the San Rafael River. This could either be a new park or an addition to the Canyonlands and Capital Reef National Parks.

b. The San Rafael Reef and Swell should be a National Park. Until it becomes so, it should be protected by wilderness status. The small isolated areas proposed by BLM won't do it. It needs large areas to protect the integrity of this special place. To sacrifice this whole area so a few dirt bikers can have fun, doesn't make sense. The All Wilderness Alternative must be adopted in all the WSAs around the San Rafael Reef and Swell.

**59.5 RESPONSE:** See the response to General Comment 3.30.

**59.6 COMMENT:** We would urge BLM to consider expanding the unit boundary to include the North Temple Wash area and water sources in Lone Man Draw. These areas are critical habitat acres for bighorn sheep and including them reduces the likelihood of ORV disturbance to this noise and encounter sensitive species. [Slickrock Outdoor Society]

**59.6 RESPONSE:** BLM field people have determined that the two areas in question do not meet the wilderness study criteria. Therefore, they have not been included within the WSA boundary.

**59.7 COMMENT:** For the past 5 years, we have picnicked in the San Rafael Reef. We have accessed the reef over constructed roads located in T. 13 E., R. 22 S., in approximately section 35. I have driven there in my Buick Century four door sedan and my Chevy van. Vehicle tracks and other signs indicate that others also visit this area. This part of the reef is not roadless and therefore it does not meet the roadless criterion for wilderness purposes. [Bill Howell]

**59.7 RESPONSE:** According to the official definition of a road, BLM has determined that there are no roads in the San Rafael Reef WSA. There are 10 miles of ways and trails which have been created by use. These have not been constructed and/or maintained by mechanical methods.

**59.8 COMMENT:** We believe that there will be a direct negative effect on future mining opportunities at the Emery Mine (especially expanded production through surface mining) by these wilderness designations. BLM efforts to protect proposed high quality Class A scenery (e.g., Sids Mountain) or to protect visibility at the proposed VRM Class I areas will ultimately include attempts by the Federal Government to reduce fugitive dust emissions in Castle Valley and surrounding areas through the coal mining and air quality permitting processes. Requirements for fugitive dust controls above those currently practiced by the Utah coal industry will lead to additional production costs and constraints which would weaken the competitiveness of our Emery County reserves. [Consolidated Coal Company]

**59.8 RESPONSE:** Future mining activities at the Emery Mine would not be affected by wilderness designation for any of the WSAs in the San Rafael Swell. Appendix 7 explains the basis for VRM Class I management. Air quality related visibility is not a normal parameter in determining the VRM Class. The EIS explains that BLM wilderness areas would remain PSD Class II unless that classification is changed by the State of Utah. The State could change that classification, with or without wilderness designation. However, BLM believes that such a change in the San Rafael Swell would be unlikely. See the responses to General Comments 10.3 and 10.5.

**59.9 COMMENT:** BLM's Proposed Action should include acreage outside the WSA. [Sierra Club, Cache Group]

a. We thank BLM for recommending 59,170 acres of this area in its wilderness proposal. We find that this is significant since it goes beyond the WSA size of 55,540 acres. This shows that BLM can extend proposed wilderness boundaries beyond WSA boundaries when the land qualities merit this.

b. We support and recommend to BLM the Utah Wilderness Coalition's 80,000-acre proposal for the San Rafael Reef.

**59.9 RESPONSE:** Subsequent to the variation presented in the EIS, a policy was made that the inventory phase has been completed, that the WSA boundaries are set, and that further boundary changes (beyond those in previous EIS documents) will not be allowed as part of the BLM analysis and/or Proposed



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

Action. The coalition proposal includes lands beyond the boundary of the WSA.

**59.10 COMMENT:** UP&L is very concerned also about the effect of air quality restrictions from wilderness areas in the vicinity of its existing Hunter and Huntington plants located in Emery County. The table below lists the WSAs that are in close proximity to the Hunter and Huntington plants. These WSAs and their future affect on UP&L's operations should be considered for each alternative. [Utah Power and Light]

WSA	Name	Distance	Distance
		From Hunter	From Huntington
62	Devil's Canyon	21 S	32 S
63	Sids Mountain	10 SE	20 SE
64	Mexican Mountain	23 SE	30 SE
61	Muddy Creek	34 S	43 S
60	Crack Canyon	41 SE	52 SE
59	San Rafael Reef	31 SE	42 SE
65	Jack Canyon	58 NE	54 NE
66	Desolation Canyon	39 ENE	41 ENE
67	Turtle Canyon	40 ENE	40 ENE
68	Floy Canyon	54 ESE	56 WSA
29	Phipps-Death Hollow	98 SSW	111 SSW
31	No. Escalante Canyon	86 SSW	97 SSW
30	Steep Creek	89 SSW	100 SSW

**59.10 RESPONSE:** See the responses to General Comments 10.3 and 10.5.

**59.11 COMMENT:** The geologic formation identified as Coconino is probably the White Rim Sandstone. [State of Utah]

**59.11 RESPONSE:** This correction has been made for the Final EIS.

**59.12 COMMENT:** The Draft EIS states that the Chinle Formation does not occur east of the outcrop; in actuality, since the Chinle Formation dips easterly, it should subcrop below the WSA. Also, the overburden increases to the east. [State of Utah]

**59.12 RESPONSE:** The discussion regarding geologic formations has been reworded and clarified for the Final EIS.

**59.13 COMMENT:** The "Eocene Age" would be more precisely termed "Eocene Epoch," the age (millions of years ago) of this movement might be worth including. [State of Utah]

**59.13 RESPONSE:** The term "Eocene Epoch" was used in the Final EIS for the San Rafael Reef WSA. Citing the number of years would not add significantly to the usefulness of the narrative.

**59.14 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**59.14 RESPONSE:** A statement has been included in the Final EIS concerning these resources.

**59.15 COMMENT:** BLM's statement in Volume I (a rationalization for not selecting Vegetation as an Issue) refers to threatened and endangered species by stating, "Because necessary measures would be taken to protect these species, it can be concluded that the viability of populations of threatened, endangered, or sensitive plant species would be preserved with any of the alternatives." This statement is flawed. The Mexican Mountain SSA clearly indicates on page 40 (Vol. VI):

"additional access would become established in the 12,850 acres of the WSA not designated. This could increase the threat to Sclerocactus wrightiae. The area not designated includes the one known site for this species. Also in the undesignated, ORV use could eventually become established into the habitat area for Erigeron maguirei due to its proximity to Buckhorn Draw."

Anything but the All Wilderness Alternative could result in the loss of these species because the area is open to ORVs. Similar situations exist in other WSAs (Moquith Mountain and other San Rafael WSAs) with respect to threatened and endangered plant species. It cannot be automatically concluded these species will survive without wilderness designation especially given the reluctance to close areas to ORVs and the fact the Section 7 consultation and mitigation will only be done on proposed projects which would cause surface disturbance such as mineral activity. Realistically speaking, there is no protection for these species in areas open to ORVs. [Utah Wilderness Association]

**59.15 RESPONSE:** See the responses to General Comments 13.1 and 13.5. It is recognized that individual plants are occasionally lost from public lands as a result of land use activities, including ORV use. This is a continuing concern and BLM recognizes that it has a responsibility to protect special status plant species and to take the proper steps to fulfill that

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

responsibility. Wilderness designation would generally help preserve special status plant species. However, it is not the only management option available to BLM. Other available actions include land use planning which can result in ORV closures, signing, patrolling, etc. BLM encourages and supports scientific studies of special status species to better understand potential threats, habitat requirements, and reintroduction possibilities. BLM actively manages these species and has taken several actions in the past year to ensure their protection. Therefore, it is flawed reasoning to assume that failure to designate an area wilderness automatically ensures the destruction of threatened and endangered and other special status species. With regard to Sclerocactus wrightiae, the cactus is known to occupy several sites in the San Rafael Swell area. Studies are under way to inventory the San Rafael area to determine locations of other sites and document possible threats to the species. With regard to Sclerocactus wrightiae, preliminary data indicated that the species is more widespread than previously thought. The text in the Final EIS has been clarified to better express the correct situation. Erigeron maguirei var. maguirei is located on a steep hillside in an area of the San Rafael Swell where ORV use does not presently occur and on Secret Mesa. Habitat damage by ORV use was not a concern given by FWS when listing species. Further, the majority of the known habitat is located on State-of-Utah land and not available for wilderness designation. Should the area occupied by the species expand on to level benches and washes where the potential for ORV use could occur, BLM would review the situation at that time and take the appropriate actions to continue to preserve the species.

**59.16 COMMENT:** Although BLM did recognize rare and sensitive plant species in the Draft EIS, the analysis was incomplete. The failure to identify vegetation as a major Statewide issue, particularly when three major issues deal with livestock grazing, shows a bias against natural values and an inconsistency in the selection of issues. [Utah Wilderness Association]

**59.16 RESPONSE:** See the response to General Comment 13.1. Impacts on vegetation including special status species is analyzed as an issue for the San Rafael Reef WSA in the Final EIS.

**59.17 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. According-

ly, I submit to you with this statement, a copy of our resolution numbered 4-17-86 concerning Federal reserve water rights. [Emery County]

**59.17 RESPONSE:** The resolution is contained in the Final EIS in Volume VII-A.

**59.18 COMMENT:** The impact of wilderness designation on the salinity of the San Rafael River should be analyzed. [Emery County]

a. Being that the San Rafael and the tributaries to the San Rafael are major contributors to the Colorado River salinity problem, we are concerned with what measures might be taken if down stream areas are designated wilderness.

b. The Draft EIS is remiss in that it does not take into consideration the water salinity problem on the San Rafael, Muddy, and Price Rivers and it further does not indicate how this problem will be dealt with if wilderness is designated on these streams. Because these bodies of water and tributaries to these bodies are major contributors to the Colorado River salinity problem and because the Bureau of Reclamation has been given the charge of solving the salinity problem and because the Sierra Club v. Block decision regarding a Federal reserve water right may have a major impact on what can be done, it is felt that there should be no wilderness recommendation made nor should there be any wilderness designated until these issues are addressed and resolved favorably to Emery County.

**59.18 RESPONSE:** Additional information on salinity is provided in the Final EIS.

**59.19 COMMENT:** In Volume VI of the San Rafael Reef, it states that the water, ". . . presents problems for human consumption . . ." This is reiterated again that there is ". . . a limited variety of wildlife species . . ." because ". . . the area lacks both a permanent water source. The EIS changes where it states that, ". . . the presence of water sources allows it to meet the standards for recreation." Also it says, ". . . wildlife would benefit . . ." Maybe that should have read, the limited wildlife would benefit." It also should have pointed out the limited wildlife would benefit on 200 acres of proposed 59,170 acres, or 0.3 percent of the area. [Dale George]

**59.19 RESPONSE:** The wording has been clarified. Water is available, but it is limited. Water quality in

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

the WSA generally is not good enough for human consumption; however, it is used by wildlife.

**59.20 COMMENT:** Our Emery reserve is located on upstream watersheds of streams which flow through the proposed wilderness areas. A wilderness designation would impart to the Federal government a reserved right to all unappropriated waters which flow through the wilderness area. This water right is considered superior to the rights of all future appropriators. Such a restriction could mean that water would be unavailable for future mining needs including coal cleaning, dust suppression, drinking water, and irrigation during reclamation, and thus eliminate the possibility of future mine expansions. [Consolidated Coal Company]

**59.20 RESPONSE:** See General Comment Response Section 13 concerning water uses and issues. The San Rafael River does not pass through the San Rafael Reef WSA, and the restrictions mentioned in the comment would not occur as a result of wilderness designation.

**59.21 COMMENT:** The EIS should point out that wilderness designation in the San Rafael Swell would lead to stricter air and water quality standards that would interfere with industry. [Emery County and Consolidated Coal Company]

a. The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions. Future mineral production could be hindered by regulation of water running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation.

b. In enhancing water quality of streams flowing through wilderness management areas, efforts to improve water quality will likely be directed at upstream point source discharges, which will include coal mine discharges. More stringent effluent limitations applied to coal mines through the NPDES permitting process would likely increase production costs and possibly preclude future mine expansions.

**59.21 RESPONSE:** Air and water quality standards exist regardless of wilderness considerations. It is expected that industries in the future will operate within reasonable pollution control standards. It is unlikely that wilderness designation, by itself, would require application of new standards that would be so strict as to prevent responsible development activities.

Also see the responses to General Comments 10.3, 10.4, 10.6, 14.11, 14.23, and 14.26. The San Rafael River does not pass through the San Rafael Reef WSA and impacts on water use is not an issue for this area.

**59.22 COMMENT:** UP&L has pending and perfected water rights in the San Rafael River basin amounting to 150,000 acre-feet and 141.184 CFS for power, stockwatering, and irrigation use. UP&L has purchased all irrigated land along the San Rafael River and believes that the San Rafael River is totally appropriated during average or below average water years, when potential conflicts with wilderness areas over water would occur. In addition, UP&L has purchased and developed water rights on tributaries to the San Rafael River for use in its existing steam electric plants in Emery County. Continued use of those water rights is essential to UP&L's generation of electricity in its large Emery County plants. [Utah Power and Light]

**59.22 RESPONSE:** Additional information on water rights and water use has been included in the Final EIS. There are no perennial tributaries to the San Rafael River in the San Rafael Reef WSA.

**59.23 COMMENT:** Emery County has vast natural resources in the San Rafael Swell. There are millions of barrels of oil in the tar sand within the WSA. The San Rafael tar sand deposit (parts of Townships 23 and 24 South, Ranges 9, 10, and 11 East) contains measured reserves of 300 million barrels of oil in place in 25,600 acres plus another 250 million barrels of speculative reserves in another 25,600 acres (major tar sand and heavy oil deposits in the U.S., Interstate Oil Compact Comm. 1984, p. 255). This large tar sand reserve is in jeopardy of never being developed if any of the surrounding WSAs are designated as wilderness. The reason for this is the possibility of development impacts on visual vistas in areas that can be seen from the wilderness lands. If these visual vistas are ever used, then forget any tar

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

sand development at any time in the future. [South-eastern Utah Association of Local Governments]

**59.23 RESPONSE:** Integral vistas are not mandatory even for PSD Class I areas and the concept does not apply to BLM wilderness areas. In any event, the State of Utah has chosen not to designate integral vistas even in PSD, Class I areas. Only 1,920 acres of the tar sand deposits are in the WSA.

**59.24 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The northeast portion of Garfield County and the eastern portions of Wayne and Emery Counties, WSA areas numbered 38 through 41, 58, 59, and 64, also have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic and Mesozoic age rocks. [Texaco Inc.]

**59.24 RESPONSE:** See the response to Specific Comment 39.16.

**59.25 COMMENT:** Has the tar sand on the south side of Hondoo Canyon found in the Wingate sandstone been included in this study? Has the tar sand found in the Navajo formations in the mouth of Coal Wash been included in the study? What was the input on the two oil seeps in Saddlehorse and one oil seep in the left fork of Mexican Seep? [Owen McClenahan]

**59.25 RESPONSE:** The tar sand on the south side of Hondoo Canyon and the oil seep in the left fork of Mexican Seep are within the San Rafael special tar sand area (STSA) as designated by USGS in 1982. These resources were considered in the Final EIS. Tar sand resources outside designated STSAs are not considered in the Final EIS. They are not within the San Rafael Reef WSA.

**59.26 COMMENT:** We anticipate that future Federal coal leasing decisions, which are essential for a stable coal mining industry in Utah, will be negatively influenced by BLM's responsibilities to maintain and improve air and water quality in designated wilderness areas. This conflict will increase pressures on BLM to delete certain coal tracts from the competitive leasing process if it is perceived that development may have negative impacts on wilderness values. Future coal production throughout Utah will be reduced by this process. [Consolidated Coal Company]

**59.26 RESPONSE:** See the responses to Specific Comment 59.21 and General Comment 7.1. BLM does not expect to manage adjacent areas to provide buffer zones around designated wilderness areas.

**59.27 COMMENT:** In Emery County, UP&L is lessor under several oil and gas leases, from which it receives rent and royalties, near the following WSAs: 59 (San Rafael Reef), 62 (Devils Canyon), 63 (Sids Mountain), and 64 (Mexican Mountain). Gas production is occurring within 10 miles to the northwest of WSA 63. [Utah Power and Light]

**59.27 RESPONSE:** Production from the Ferron gas field is noted in the Final EIS.

**59.28 COMMENT:** Special care should be taken to evaluate oil and gas potential in the San Rafael Reef, Mexican Mountain, Devil's Canyon, and Sids Mountain WSAs in the Geological Survey and Bureau of Mines report on the wilderness proposals to be submitted to the Secretary of the Interior. UP&L and other persons commenting on the Draft EIS should have an opportunity to comment on this report, and they are prejudiced by not having it to comment on at the same time as the Draft EIS. The Final EIS should address impacts on these proposed wilderness areas from continued development outside but very near their borders, and reevaluate their qualities for wilderness designation in light of this potential for development. [Utah Power and Light]

**59.28 RESPONSE:** BLM has reevaluated the potentials for exploration and development of oil and gas resources within the four WSAs listed in the comment. Some oil and gas exploration is protected in the Mexican Mountain WSA but no oil and gas production is anticipated. Refer to Appendix 6 for details on mineral exploration and development projections.

**59.29 COMMENT:** We concur with the OIR(2-) rating for minerals. The Draft EIS states, "All [mineral] resources within the WSA were assigned low favorabilities or listed as none." Only a tiny portion (less than 1,000 acres) seems to have valid mining claims. The San Rafael Reef WSA's mineral value is insignificant. [Utah Wilderness Association]

**59.29 RESPONSE:** The OIR rating is not used in the Final EIS. The San Rafael Reef WSA is projected to have potential for uranium exploration and development, with or without wilderness designation.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

**59.30 COMMENT:** BLM's proposal does not include important wildlife habitat in the western portion of the San Rafael Reef. [Sierra Club, Cache Group]

**59.30 RESPONSE:** The presence of wildlife habitat is not one of the main criteria for wilderness, although it may be recognized as a special feature. Wildlife habitat west of the San Rafael Reef WSA can be appropriately managed in accordance with the BLM San Rafael RMP.

**59.31 COMMENT:** Part of my winter permits are in the San Rafael Reef area, and a few years ago, without predator control, I lost over 130 head of sheep in a 5-month period due to coyotes. Last year I only lost about 15 head with predator control. I could not last very long without predator control. [Utah Farm Bureau Federation]

**59.31 RESPONSE:** Additional information on predator control in this WSA has been provided in the Final EIS.

**59.32 COMMENT:** An important part of this wilderness area is the diverse habitat found not just within the deep sandstone canyons, but also in the access gullies, benches, and pinyon-juniper forest. It takes all of these components to protect the character of what lives on this land. [Utah Wilderness Coalition]

**59.32 RESPONSE:** The EIS describes the character of the terrain, vegetation, wildlife habitat, and major wildlife species.

**59.33 COMMENT:** I agree with BLM that this WSA has outstanding opportunities for both solitude and primitive recreation. I question the Class IV VRM classification given the Class B scenic quality because the visual resources manual states that Class A and Class B scenic quality areas with high sensitivity should be placed in VRM Class II or Class III. [Owen Severance]

**59.33 RESPONSE:** See the response to Specific Comment 26.42.

**59.34 COMMENT:** Unfortunately, extensive ORV destruction is also present in the WSAs in the San Rafael. I recently spent several days hiking in these areas and I am appalled at the damage BLM has permitted in areas the law requires to be managed in such manner as to maintain their wilderness characteristics. [Jack Spence]

**59.34 RESPONSE:** The IMP allows ORV use to continue in the WSAs during the period of wilderness study, provided that the level and impacts from such use do not increase to the point of detracting from the potential for wilderness designation. After designation, all ORV use would be prohibited. BLM currently monitors the ORV use and related impacts. BLM has determined that ORV use in the WSA has not reached the point where it would significantly impact wilderness values in the future. Most ORV use occurs in slickrock areas or in wash bottoms, where tracks are minimal or seasonally obliterated. Other impacts generally are localized and will disappear over time.

**59.35 COMMENT:** BLM should not promote motorized use in this area as it is now doing through "cooperative agreements." Sufficient ORV areas are available without opening up important potential wilderness areas. [Sierra Club, Cache Group]

**59.35 RESPONSE:** The Cooperative Management Agreement between BLM and the Pathfinders Motorcycle Club for a trail system was approved in January 1986. An environmental assessment analyzed the motorcycle trail system adjacent to the San Rafael WSA. The agreement has no bearing on the wilderness qualities within the WSA or the BLM Proposed Action for wilderness designation of the WSA.

**59.36 COMMENT:** Title 24, Chapter 2, of the Utah Code requires me to be responsible for the suppression of uncontrolled fires on State-owned lands. The Draft Environmental Impact Statement allows for measures to control fire in a wilderness area when the fire threatens human life, property, or high-value resources on adjacent nonwilderness lands, or when the fire threatens to create unacceptable changes to the wilderness resource. Further, the statement assumes that fire fighting measures would be limited to aerial and hand methods. There are a total of 50 sections of State owned land within the WSAs in Emery County. This State in-held land creates a major conflict between my statutory duty to suppress uncontrolled fires on State-owned land and the limits placed upon me by wilderness designation to comply with that duty. I believe it is impractical to think that effective fire control could take place under those limitations and conditions. Adjacent to the study areas are 84 State owned sections of land. More than within the WSAs, designation poses a greater conflict in regard to fire control to the adjacent areas. Effective fire control requires the officer in charge to make quick decisions regarding time and manner of control

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

operations. If I must determine whether or not a fire within the wilderness area poses a threat to human life, property, or high-value resources on the adjacent land, I will use valuable time. Time that may make the difference between success and tragic failure. Further, the means which I am restricted to use, hand and aerial, would be drastically ineffective in fighting a fire which threatens human life, property, or high-value resources. [LeMar Guymon]

**59.36 RESPONSE:** Fire suppression has been and continues to be an important BLM management responsibility. BLM records for the past 10 years show that about one fire per year occurs in the BLM San Rafael Resource Area, which includes most of the San Rafael Swell. The WSAs in the San Rafael Swell have a low potential for fire due to the sparse vegetation and extensive rock areas. Therefore, fire is not a significant wilderness management concern in this area.

**59.37 COMMENT:** Emergency care also falls within my duties. By declaring the land a wilderness, BLM states that increased use will result. Increased use logically leads to an increase in accidents or emergencies. One would suppose that an increased risk of accidents or emergencies would require an increase in effectiveness in responding to the need. Under wilderness designation, however, it is clear that vehicular travel within the area is prohibited. It may be implied from the limitation to hand and aerial methods of fighting fires that there would be severe restrictions and limitations in the manner in which emergencies or accidents could be handled in the wilderness area. I view these conflicts as significant problems inadequately addressed by BLM in their Draft EIS. I am opposed to the designation as wilderness of these study areas because of the limitations and restrictions placed upon my department when dealing with emergency situations, directly in conflict with my statutory duties. [LeMar Guymon]

**59.37 RESPONSE:** The BLM wilderness management regulations recognize the potential need for emergency rescue actions. See EIS Appendix 1, Part B, paragraph 8560.3. BLM has not identified safety and health considerations as an issue to be analyzed in detail in the EIS.

**59.38 COMMENT:** BLM has done a poor job in analyzing the present recreational use of the San Rafael Swell area. I don't believe they have any data to back up the numbers that they are putting in the EIS. Because of that, I got myself and the club in a little bit

of trouble over Easter by putting up some signin boards in several areas of the San Rafael Swell to try to determine what some of the recreational usage levels were down there. My numbers indicate that there is at least a five-to-one ratio in favor of off-road vehicles. And I think BLM will have an extremely serious problem in trying to manage those areas if they are closed to off-road vehicles. [Dick Brass, Path Finders Motorcycle Club]

**59.38 RESPONSE:** Actual recreational use figures are not available for the WSA areas in the San Rafael Swell. Visitor day estimates in the EIS are derived from periodic field inspections by BLM personnel. BLM estimates that annually there are approximately 650 visitor days of use in the WSA. Most of this use is related to activities that require access by vehicle.

**59.39 COMMENT:** The Recreation and Wildlife Committee in the county is aware of extensive use of the San Rafael areas for recreation, serving campers and ORV users from throughout the State. These people bring money into our area and help our small businesses which helps our economy. The Draft EIS statement is inadequate in the extent there are many roads in this area that are not covered by the impact statement. Many trails and ways are used by the ORV users and four-wheel drivers. [Stan Truman]

**59.39 RESPONSE:** See the responses to Specific Comment 59.7 and General Comment 24.8.

**59.40 COMMENT:** Eighteen deep canyons cut into the swell, offering outstanding multiday trips. Rare finds of grape agate occur for gem and mineral collectors. Ancient Indian rock art can be found in several locations. [Utah Wilderness Coalition]

**59.40 RESPONSE:** The topographic, rock collecting (including grape agate), mineral, and cultural aspects of the WSA are described in the EIS.

**59.41 COMMENT:** Also in San Rafael Reef EIS, BLM's criteria states the area should be substantially unimpacted by man. Yet it states, "Shacks, cabins, and mining shafts dot the area." But apparently that can be easily explained by saying, "adding a historic flare to the natural surroundings." [Dale Grange]

**59.41 RESPONSE:** The EIS recognizes that historic mining-related activity took place in the WSA and that the imprints (tunnels, shafts, cabins, and

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

shacks) are still visible but old enough to blend in with their primitive environment.

**59.42 COMMENT:** According to BLM, roads outside of some WSAs intrude into the solitude, i.e., U-95 outside Cheesebox Canyon, while in other WSAs they help add to the feeling of isolation, i.e., San Rafael Reef, I-70 and U-24. And in still others, i.e., Road Canyon, a dirt road in Comb Wash was enough to cause elimination from the BLM proposal of the flat below the canyon. This is inconsistency at its worst. [Michael Salamacha]

**59.42 RESPONSE:** See the response to Specific Comment 47.14.

**59.43 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to:

1. Protect the tax base.
2. Foster agriculture and industry, including mineral reduction and processing plants, together with uses.
3. Stabilize and improve property values.

We do not feel that the BLM Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine wilderness study areas as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possibly affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986, to become a matter of record. Quoting from Section C of this plan, I conclude: "C. Open Space - In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County and accordingly, the county has adapted a zoning resolution in accordance with the earlier mentioned comprehensive plan and its accompanying statement of intent.

Further, Emery County positions itself:

1. To support the highest, economically allowable development of known mineral and energy resources throughout the county.

2. To utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable.

3. To maintain at least present levels of AUMs on public lands.

4. To preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands. Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statutes.

5. To support land exchanges within the county where they can be shown to be economically beneficial to the county, and only when the county officials are provided opportunities for input in the decision process.

6. To study intensively all areas included in the Wilderness Study Areas 023, 054, 029A, 007, 045, 068 A, and 067, including drillings and other appropriate samples. While the county recognizes that there are areas in the county of critical environmental concern, not enough is known regarding subsurface minerals and resources. Under no circumstances will the county agree to any wilderness designations without a thorough analysis of all potential resource developments affected thereby. On these matters, the county intends to play a role in the decisionmaking process as provided by law. [Emery County]

**59.43 RESPONSE:** County zoning is not legally applicable to Federal lands. As a matter of policy, BLM consults with State, local, and other Federal agencies regarding their land use plans. The BLM land use planning process has a formal procedure for coordination with State and local land use plans through a "Governor's consistency review." Also, see the responses to General Comments 23.4, 23.8, and 24.3.

**59.44 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that even though it acknowledges the presence of the Emery County

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accordingly and, in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**59.44 RESPONSE:** See the response to Specific Comment 25.23.

**59.45 COMMENT:** In a paper entitled "Discussion of an Option to Proposed Wilderness Designation on the San Rafael Swell" by the Emery County Economic Development Council, the following statements are made: "We are taking the stand that some wilderness designation in Emery County is in the long-term best interest of the county." "With few exceptions, we concur with the findings as they were published in the site-specific analysis for each of these areas in March of 1983. We come to an even more complete concurrence with the recommended findings of the BLM, which proposes setting aside 366,345 acres in eight of the nine proposed Wilderness Study Areas." "Due to the geographic nature of the land that has been designated as wilderness, it has to be considered as wilderness. Accordingly, we would be acting irresponsibly if we were to discourage or oppose some wilderness designation in Emery County." "But we see in wilderness designation, some status that would encourage visitation of a broader audience than we are now receiving." "There is a certain portion of our County that is deserving preservation and protection." It is very disappointing to have local officials say one thing then do completely otherwise. To take a position that there will be no wilderness on the San Rafael does nothing towards resolving the wilderness issue on San Rafael. [Utah Wilderness Association]

**59.45 RESPONSE:** The Final EIS presents the position of the Emery County Board of Commissioners. The county commission has endorsed the Consolidated Local Government Response to Wilderness (Utah Counties, 1986) that opposes wilderness designation of BLM lands in Utah.

**59.46 COMMENT:** San Rafael Reef WSA is considered to rank high for wilderness-quality values and low for significance of conflicts compared with the other WSAs in the San Rafael Region. There are only minor mineral and energy and water development conflicts. The area does provide high quality wildlife habitat. [State of Utah]

**59.46 RESPONSE:** The BLM Proposed Action is the All Wilderness Alternative for the San Rafael Reef WSA.

**59.47 COMMENT:** In Volume I, it is indicated that "Utah's mining industry now accounts for less than 3 percent of the State's total employment." In Emery County, over 50 percent of the local work force is either in mining or a utility-related position. The Draft EIS indicates that Emery County is one of six counties that could have "the greatest potential for significant impacts resulting from designation," yet the BLM Proposed Action does not appear to take this into consideration. We ask that BLM carefully weigh their recommendations and decisions as they complete their Final EIS. [Emery County]

**59.47 RESPONSE:** BLM has reanalyzed the likelihood of mineral exploration and extraction from the WSA. Consequently, the anticipated socioeconomic impacts for each alternative have been reconsidered. The Final EIS contains revised information in the individual WSA analysis and in the Statewide analysis.

**59.48 COMMENT:** We believe that wilderness designations will negatively affect business opportunities elsewhere in the county, as well as directly remove significant acreages of Emery County from any future coal planning options. This process will permanently limit the economic growth potential of Emery County. [Consolidated Coal Company]

**59.48 RESPONSE:** The EIS indicates that over the long term wilderness designation would cause a slight change in local economic conditions from those which would occur with the No Action/No Wilderness Alternative. This situation would result from exploration and development of uranium from valid mining claims in existence at the time of wilderness designation. Such claims could be developed but under more restrictive conditions than they could be without wilderness. As a result, about 100 jobs would be created with uranium development in the San Rafael Reef WSA with wilderness as opposed to approximately 200 jobs that would be created without wilderness. Two-hundred jobs would represent 2.9 percent of the total projected Emery County work force of 6,700 jobs by the year 2010 (Utah Office of Planning and Budget, 1987). The period or length of such employment is unknown. Other economic factors would not be affected by wilderness designation. Livestock grazing levels would not change as a result of wilderness. Recreational use is projected to increase at a rate of



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 59: SAN RAFAEL REEF WSA (CONTINUED)**

between 2 to 7 percent per year in the foreseeable future with or without wilderness. Other mineral resources known to exist or projected to exist within the WSA do not support a conclusion that significant development would occur without wilderness.

**59.49 COMMENT:** Page 22 - Locatable Minerals. When the narrative continues on to page 23 the subject changes. The proper continuation is found on page 25. [State of Utah]

**59.49 RESPONSE:** The editorial correction has been made.

**SECTION 60**  
**CRACK CANYON WSA**

**60.1 COMMENT:** A public hearing was held on November 13, 1985, "for the purpose of gathering public input on the wilderness designation of the San Rafael Swell area and possible alternatives to wilderness designation." At this time I would like to submit the transcript of that hearing for the public record. At that public hearing a straw poll was conducted to determine which land use actions the public wished to pursue. Participants were asked to rank seven different options according to their personal preference. Each ranking was given a point value, with the first choice given seven points, and the last choice only one point. The results were as follows: The number one choice, with 584 points, was to "put all efforts into opposing wilderness designation on the Swell." The option of supporting wilderness designation on the Swell placed sixth, with 140 points. The least preferred alternative was to support a national park designation on the Swell. In order to represent the public interest as elected officials, the Emery County Commission issued a formal statement in which it was stated, "The Commission has concluded that it cannot support any designation upon the San Rafael Swell by any agency that would result in restrictive and exclusionary management practices beyond those practices currently employed by the Bureau of Land Management." In other words, we cannot support anything other than multiple use management of the Swell.

As public officials, we are obligated to represent the majority will of our county citizens. We feel we have done so in taking the position we have taken. [Emery County]

**60.1 RESPONSE:** See the response to Specific Comment 59.1.

**60.2 COMMENT:** BLM wilderness inventory decisions are erroneous. [Utah Wilderness Coalition]

a. By exaggerating the significance of impacts and misrepresenting the wilderness activities and solitude, BLM dropped large natural areas. The BLM's justification uses rationale which in other areas the IBLA has found to be in error. Had these same decisions been applied to this unit, an additional 50,100 acres would have been added to the wilderness study. In the initial inventory, BLM reviewed this unit and found that it deserved wilderness review in the intensive inventory. With no public notice, the unit was divided into three subunits between the end of the initial inventory and the beginning of the intensive inventory. The decision to divide this area came without a proposal and a public comment period. By fragmenting the area, BLM made deletions of large natural areas more arguable. Under the inventory policy, only a portion of the unit needs to possess either wilderness-grade solitude or wilderness activities. By creating separate units, each subunit's solitude and wilderness activities would be assessed separately. This allowed BLM to drop large natural areas. BLM claims that the division lines are roads. According to the wilderness inventory policy, a vehicle route must have a written record that shows the time, date, and purpose for regular vehicle use, periodic maintenance, and construction. Part of the vehicle route forming the boundary between top subunits does meet these requirements as a vehicle road, but the remainder of the routes separating these three subunits do not. But BLM records maintained roads on a transportation system map in the Resource Area office. With the exception of the Temple Wash to Chute Canyon road, that map did not show these dividing vehicle routes as maintained roads. BLM falsely used these vehicle ways to divide this large area. The BLM's fragmenting of other units has been challenged in administrative appeals. The IBLA found fault in this and remanded those units. In this case the BLM failed to report the division of the unit and used division to justify deletion of large natural areas.

b. In the Crack Canyon subunit, BLM found 7,550 acres in a 32,700-acre subunit were impacted and these were isolated to a few areas. BLM failed to report uranium exploration which occurred in this unit during the inventory. Some of the 4,950 acres later

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 60: CRACK CANYON WSA (CONTNUED)

found to be "unnatural" acquired impacts during the inventory.

c. BLM exaggerated the extent of impacts in many areas. BLM removed 900 acres because of the presence of a 0.25 mile vehicle way, the only impact in the area. In another example, the seismograph line indicated in T. 25 S., R. 11 E. is not visible on the ground. A reported road entering the unit approximately 2 miles northeast of Wild Horse Butte is actually a vehicle way in a different location than shown by BLM. An old landing strip is almost totally overgrown and is also in a different location than shown by BLM.

d. In the Cistern Canyon inventory subunit, BLM exaggerated the significance of impacts. Two of the stock reservoirs are more correctly called gully plugs, dikes of dirt approximately 4 feet high across a gully. As described before, the vehicle way used for half the subunit boundary (on the south and east), while a vehicle way, does not meet the requirements of a road. A vehicle way shown by BLM leading south past the stock reservoir 2 miles south of East McKay Flat vanishes after half of its purported length. The vehicle ways within the unit occupy less than 2 acres and do not disturb adjacent parts of the unit. BLM incorrectly included natural areas where no evidence of human impacts can be found with those areas which do contain impacts.

e. At the Chute Canyon subunit, the air strip, one drill site, and mine are shown by BLM to be adjacent to the unit boundary. In fact, after extensive searches, neither the drill site nor the way leading down the slope to the drill site near McKay Flat were located. The alleged seismograph line 1.5 miles north-northwest of Flat Top is really a wash mistaken from an aerial photograph. According to a member of the BLM wilderness staff, the impacts were all reviewed from aerial photography. The significance of these impacts was not verified in the field. None of the intrusions, with one exception, is more than a mile from the unit boundary. Intrusions like the fences and gully plugs (called reservoirs) are found in designated wilderness areas and are not significant intrusions. Without addressing if an intrusion is significant or not, BLM identifies more than 90 percent of the unit as natural. Again BLM exaggerated the extent of human impacts.

f. BLM found that only one of the three inventory subunits possessed wilderness-grade solitude, Crack

Canyon. In Crack Canyon they found the "near vertical geologic formations" "provide excellent topographic screening." In Cistern Canyon, BLM decided that solitude was inadequate because the vegetation and landforms "do not tend to afford screening." BLM incorrectly limited the assessment of solitude to just screening. The IBLA ruled against this limited assessment technique in other areas. The solitude in Chute Canyon was also found by BLM to be inadequate because of a narrow finger of roadless land that extends outside the bulk of the unit. This finger is approximately 2 miles long and includes approximately 900 acres of the 31,340 found in this subunit. BLM also found the size did "not afford an outstanding opportunity for solitude." This is a huge topographically diverse unit. More than 30,000 acres proves this BLM conclusion erroneous. Lastly, vegetative screening was deemed inadequate even though there were more than two dozen miles of twisting drainages with ridges and hills separating each turn and physically isolating different areas. The BLM record and our members' field work refute the BLM's conclusion.

g. Where BLM found the topography adequate, they also found wilderness activities outstanding. In Crack Canyon, BLM also found hiking, backpacking, rock scrambling, and sightseeing were outstanding. In Cistern Canyon and Chute Canyon, the BLM found that the same landforms and vegetation that BLM found inadequate for solitude were also found inadequate for wilderness-grade activities. The land forms and vegetation of the unit do not provide outstanding opportunities for primitive and unconfined recreation. The area description for Chute Canyon conflicts with the BLM argument in describing the attraction of hikers in the rugged and narrow relief of that canyon. No attempt was made to assess the wilderness activities associated with the supplemental values found in the three subunits. There was also no attention given to the diversity of wilderness activities which totaled seven. Both of these issues had been addressed in administrative appeals on other units. BLM was found in error for not assessing both the wilderness values with supplemental values and the diversity of activities. [Utah Wilderness Coalition]

**60.2 RESPONSE:** See the response to General Comment 3.1.

**60.3 COMMENT:** The San Rafael Swell should be under wilderness study protection until national park status can be carefully analyzed. [Wendall Anderson and John Lockhart]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 60: CRACK CANYON WSA (CONTNUED)**

a. As to specific comments, I have some knowledge of the San Rafael area and am of the opinion that it merits national park status. It should be held under wilderness study protection until national park status can be carefully analyzed. The area should include all of the Sids Mountain and Mexican Mountain WSAs and additional wildlands and the more developed land around the Wedge, Buckhorn Draw, and along the San Rafael River. This could either be a new park or an addition to the Canyonlands and Capital Reef National Parks.

b. The San Rafael Reef and Swell should be a national park. Until it becomes so, it should be protected by wilderness status. The small isolated areas proposed by BLM won't do it. It needs large areas to protect the integrity of this special place. To sacrifice this whole area so a few dirt bikers can have fun doesn't make sense. The All Wilderness Alternative must be adopted in all the WSAs around the San Rafael Reef and Swell.

**60.3 RESPONSE:** See the response to General Comment 3.30.

**60.4 COMMENT:** The "variations" on the all wilderness recommendations are absolutely unsupported. If implemented, this management regimen would serve to increase conflicts between primitive nonmotorized public and ORV users and would probably be the only instance where wilderness designation and intended management served to degrade the wilderness resource. [Slickrock Outdoor Society]

**60.4 RESPONSE:** The variation of the All Wilderness Alternative to establish travel corridors through Wild Horse Wash and Chute Canyon (about 3.75 miles of wash bottom) is no longer being considered and is not part of the All Wilderness Alternative. All reference to that portion of the variation has been deleted from the Final EIS. The variation to the eastern portion of the WSA is still being considered. In that case about 250 acres would be added to the WSA, while 230 acres would be deleted for a net increase of 20 acres to the WSA (25,335 acres). This variation would improve manageability by following on-the-ground features, which would aid in boundary identification. Boundary identification in this area is important because of the potential for heavy ORV use in the drainages.

**60.5 COMMENT:** BLM now states corridors could be left open in the All Wilderness Alternative inside

Crack Canyon, slicing the area up into small parcels. One parcel is much smaller than 5,000 acres. BLM is creating semi-primitive motorized zones -- not protecting wilderness. Ironically, BLM has rejected small wilderness study areas based largely upon off-road vehicle use and outside influences. [Utah Wilderness Association]

**60.5 RESPONSE:** The Proposed Action in the Final EIS does not include a corridor through Crack Canyon.

**60.6 COMMENT:** The All Wilderness Alternative will protect those values which make the WSA so important--bighorn sheep habitat, threatened and endangered plant species, and primitive recreation. The many narrow, twisting canyons that wind through the San Rafael Reef make outstanding hiking routes. Potholes, tanks and gardens of juniper, grasses, and wildflowers are scattered across the Reef. Broken Rainbow Valley, in the southern part of the WSA, is truly one of the most picturesque areas on the entire San Rafael Swell. This small WSA cannot stand to be hacked-up any further. As the Draft EIS recognizes, anything short of the All Wilderness Alternative will create conflicts between primitive recreation users and others, and that the "variation" alternative will "compromise the full wilderness potential of the area." The Final EIS should make recommendations that resolve conflicts, not create them. [Utah Wilderness Association]

**60.6 RESPONSE:** See the response to Specific Comment 60.4.

**60.7 COMMENT:** We believe that there will be a direct negative effect on future mining opportunities at the Emery Mine (especially expanded production through surface mining) by these wilderness designations. BLM efforts to protect proposed high quality Class A scenery (e.g., Sids Mountain) or to protect visibility at the proposed VRM I areas will ultimately include attempts by the Federal Government to reduce fugitive dust emissions in Castle Valley and surrounding areas through the coal mining and air quality permitting processes. Requirements for fugitive dust controls above those currently practiced by the Utah coal industry will lead to additional production costs and constraints which would weaken the competitiveness of our Emery County reserves. [Consolidated Coal Company]

**60.7 RESPONSE:** See the response to Specific Comment 59.8.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 60: CRACK CANYON WSA (CONTNUED)**

**60.8 COMMENT:** UP&L is very concerned also about the effect of air quality restrictions from wilderness areas in the vicinity of its existing Hunter and Huntington plants located in Emery County. The table below lists the WSAs that are in close proximity to the Hunter and Huntington plants. These WSAs and their future affect on UP&L's operations should be considered for each alternative. [Utah Power and Light]

WSA	Name	Distance From Hunter	Distance From Huntington
62	Devil's Canyon	21 S	32 S
63	Sids Mountain	10 SE	20 SE
64	Mexican Mountain	23 SE	30 SE
61	Muddy Creek	34 S	43 S
60	Crack Canyon	41 SE	52 SE

WSA	Name	Distance From Hunter	Distance From Huntington
59	San Rafael Reef	31 SE	42 SE
65	Jack Canyon	58 NE	54 NE
66	Desolation Canyon	39 ENE	41 ENE
67	Turtle Canyon	40 ENE	40 ENE
68	Floy Canyon	54 ESE	56 WSA
29	Phipps-Death Hollow	98 SSW	111 SSW
31	No. Escalante Canyon	86 SSW	97 SSW
30	Steep Creek	89 SSW	100 SSW

**60.8 RESPONSE:** See the responses to General Comments 10.3 and 10.5.

**60.9 COMMENT:** Along with habitat and plant conservation, we must identify and mitigate the threats facing the species involved. BLM has a stated policy of protection for sensitive, threatened, and endangered plants that have gained recognition in the Federal Register. Unfortunately, however, the agency in Utah has a lack-luster record of effective management of even listed endangered plants. The Dwarf Bear Poppy (Arctomecon humilis) is a case in point. While this species does not occur in or even near any WSAs, the agency has failed to effectively prevent deterioration of populations. This situation prevails despite the fact that the plant was listed nearly seven (7) years ago. Similarly, the candidate species Pediocactus despainii (listing package in preparation by UFWS) of the San Rafael Swell faces increasing jeopardy because of BLM ignorance or inaction. Known to occur in at least two WSAs, Crack Canyon and Sids Mountain, the San Rafael pincushion cactus may also be found in the Mexican Mountain WSA. This diminutive cactus faces increasing numbers and frequency of ORV use in its habitat. BLM even sponsors an annual ORV event that sees hundreds of ORVs run with

loose supervision near the Crack Canyon WSA and adjacent to critical habitat for this beautiful little cactus. Since the agency has sponsored the motorcycle event each spring, increasing numbers of ORV tracks have been observed criss-crossing the terrain where these rare endemics are found. The disregard for the species and the habitat vital to its survival is of great concern. This case represents only one circumstance, but we fear that it depicts the approach and policy that BLM intends to use in addressing their land management trust. [Marvin Poulson]

**60.9 RESPONSE:** See the response to General Comment 13.5.

**60.10 COMMENT:** BLM's statement in Volume I (a rationalization for not selecting Vegetation as an Issue) refers to threatened and endangered species by stating, "Because necessary measures would be taken to protect these species, it can be concluded that the viability of populations of threatened, endangered, or sensitive plant species would be preserved with any of the alternatives." This statement is flawed. The Mexican Mountain SSA clearly indicates on page 40 (Vol. VI):

"additional access would become established in the 12,850 acres of the WSA not designated. This could increase the threat to Sclerocactus wrightiae. The area not designated includes the one known site for this species. Also in the undesignated area, ORV use could eventually become established into the habitat area for Erigeron maguirei due to its proximity to Buckhorn Draw."

Anything but the All Wilderness Alternative could result in the loss of these species because the area is open to ORVs. Similar situations exist in other WSAs (Moquith Mountain and other San Rafael WSAs) with respect to threatened and endangered plant species. It cannot be automatically concluded these species will survive without wilderness designation especially given the reluctance to close areas to ORVs and the fact the Section 7 consultation and mitigation will only be done on proposed projects which would cause surface disturbance such as mineral activity. Realistically speaking, there is no protection for these species in areas open to ORVs. [Utah Wilderness Association]

**60.10 RESPONSE:** See the response to Specific Comment 59.15.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 60: CRACK CANYON WSA (CONTNUED)**

**60.11 COMMENT:** Although BLM did recognize rare and sensitive plant species in the Draft EIS, the analysis was incomplete. The failure to identify vegetation as a major Statewide issue, particularly when three major issues deal with livestock grazing, shows a bias against natural values and an inconsistency in the selection of issues. [Utah Wilderness Association]

**60.11 RESPONSE:** See the response to General Comment 13.1. Impacts on vegetation including special status species is analyzed as an issue for the Crack Canyon WSA in the Final EIS.

**60.12 COMMENT:** The Draft EIS fails to analyze the impacts of ORV use on the candidate, proposed, and listed threatened and endangered species under the "variation" alternative. The impact could very well be significant. [Utah Wilderness Association]

**60.12 RESPONSE:** The variation proposal to establish travel corridors through Crack Canyon and Wild Horse Wash is no longer being considered. See the response to Specific Comment 60.4. An analysis of impacts to special status plant species has been included in the Final EIS.

**60.13 COMMENT:** Our Emery reserve is located on upstream watersheds of streams which flow through the proposed wilderness areas. A wilderness designation would impart to the Federal Government a reserved right to all unappropriated waters which flow through the wilderness area. This water right is considered superior to the rights of all future appropriators. Such a restriction could mean that water would be unavailable for future mining needs, including coal cleaning, dust suppression, drinking water, and irrigation during reclamation, and thus eliminate the possibility of future mine expansions. [Consolidated Coal Company]

**60.13 RESPONSE:** See the response to Specific Comment 60.15.

**60.14 COMMENT:** In enhancing water quality of streams flowing through wilderness management areas, efforts to improve water quality will likely be directed at upstream point source discharges, which will include coal mine discharges. More stringent effluent limitations applied to coal mines through the NPDES permitting process would likely increase production costs and possibly preclude future mine expansions. [Consolidated Coal Company]

**60.14 RESPONSE:** See the response to Specific Comment 59.21. Approximately 2.5 miles of Muddy Creek flow through the Crack Canyon WSA and upstream water projects could be hampered. See the response to Specific Comment 60.15.

**60.15 COMMENT:** UP&L has a pending water right in the Muddy Creek basin for 30,000 acre-feet of storage for use in a proposed steam electric generating plant. Because of the threat posed to UP&L and all other water users near the WSAs by wilderness designation, which is not quantified in the Draft EIS, UP&L categorically opposes any Utah wilderness designations until the EIS is revised to discuss all possible impacts on existing water rights and application, as well as future impacts on unappropriated water unless the legislation authorizing wilderness designations expressly disclaims any Federal reserved water rights for the areas and prohibits assertion of claims which may be made regarding water flows or quality in, through, or below the areas. [Utah Power and Light]

**60.15 RESPONSE:** Approximately 2.5 miles of Muddy Creek flow through the southwestern portion of the WSA. Since all surface waters of Muddy Creek are fully appropriated, any Federal claim for Federal reserved water rights (to facilitate primitive recreational use) established by Congress would probably be junior to and not have any effect on existing water rights and uses. Even though existing rights and uses would not be affected, wilderness designation could hamper future proposals or projects that would transfer water rights, consumptively use water upstream of the WSA, or significantly alter flow through the WSA. Projects would be hampered because changes in use, changes in points of diversion, or transfer of water rights could be protested by the Federal government to maintain flow through the WSA. Potential upstream uses include stream power electrical generation, mining, and domestic and agricultural uses. This information has been included in the Final EIS.

**60.16 COMMENT:** Emery County has vast natural resources in the San Rafael Swell in its tar sands deposits there are millions of barrels of oil in the tar sands within the WSA. The San Rafael tar sand deposit (Parts of Township 23, 24 South, Range 9, 10, 11 East) contains measured reserves of 300 million barrels of oil in place in 25,600 acres plus another 250 million barrels of speculative reserves in another 25,600 acres (Major Tar Sand and Heavy Oil Deposits in the U.S., Interstate Oil Compact Comm. 1984 p.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 60: CRACK CANYON WSA (CONTNUED)

255). This large tar sand reserve is in jeopardy of never being developed if any of the surrounding WSAs are designated as wilderness. The reason for this is the possibility of development impacts on visual vistas in areas that can be seen from the wilderness lands. If these visual vistas are ever used—then forget any tar sand development at any time in the future. [Southeastern Utah Association of Local Governments]

**60.16 RESPONSE:** See the response to Specific Comment 59.23. Only 630 acres of tar sand deposits are in the Crack Canyon WSA.

**60.17 COMMENT:** I see no mention of the Hidden Splendor Mine which is located in the Crack Canyon WSA. This mine produced about \$6 million in the 1950s, and it actually sold for \$10 million cash in 1955, and it apparently is not even worthy of mention. [Mr. Johnson]

**60.17 RESPONSE:** The Hidden Splendor Mine, now known as the Delta Mine, is located just outside of the WSA boundary in T. 26 S., R. 9 E., sec. 9. Production figures from the Delta Mine have been included in the Final EIS.

**60.18 COMMENT:** We anticipate that future Federal coal leasing decisions, which are essential for a stable coal mining industry in Utah, will be negatively influenced by BLM's responsibilities to maintain and improve air and water quality in designated wilderness areas. This conflict will increase pressures on BLM to delete certain coal tracts from the competitive leasing process if it is perceived that development may have negative impacts on wilderness values. Future coal production throughout Utah will be reduced by this process. [Consolidated Coal Company]

**60.18 RESPONSE:** See the response to Specific Comment 59.26.

**60.19 COMMENT:** The OIR (3+) mineral rating is questionable. Uranium is the only mineral that is rated as having more than a very low probability of development. Given the outlook for uranium, is it is hard to consider it as having more than a low probability of development. In addition, the Draft EIS states one of two major reasons for the "high" uranium rating is the occurrence of mines near the northwestern boundary (Temple Mountain), but also states the collapse structures present at Temple Mountain (outside the northwestern end of the WSA) are not present in

the WSA. Thus, the high potential of the Temple Mountain district does not extend into the WSA. The other major reason given is that the southern part of the Swell is considered favorable for uranium. However, the Draft EIS also states the potential in this area is unknown. Given the speculative nature of the existence of large quantities of uranium in the WSA and the low likelihood of development, it seems the OIR (3+) rating is unreasonably high and should be downgraded. [Utah Wilderness Association]

**60.19 RESPONSE:** The OIR mineral rating system has not been used for the Final EIS; see the response to General Comment 15.7. However, in 1982 Science Applications, Inc., rated the uranium resource in the Crack Canyon WSA as f4/c4, indicating that there is a high favorability with a high degree of certainty that large deposits (greater than 1,000 metric tons) of uranium oxide exist in the WSA. This rating is due to the numerous uranium mines near the northwestern boundary of the WSA, plus the fact that the southern part of the San Rafael is considered favorable for large ore bodies.

**60.20 COMMENT:** Of equal or increased importance is the negative impact the "variation" alternative will have wildlife and threatened and endangered plant species. The Draft EIS admits the "acreage within the WSA is extremely important for the continued existence of desert bighorn sheep in the area," and any disturbance to critical areas could cause a population decline. The Utah Division of Wildlife Resources (UDWR) and BLM have designated all 25,335 acres as high-priority desert bighorn sheep habitat. The Draft EIS also states a herd of bighorn sheep has been sighted adjacent to the northwestern boundary of the WSA. This is precisely the area the "variation" alternative will open up to ORV use. Reintroduction of bighorns into the adjacent Muddy Creek WSA could increase bighorn sheep use of the Crack Canyon WSA, with an accompanying increase in ORV impacts to bighorns if the area is left open to ORVs. [Utah Wilderness Association]

**60.20 RESPONSE:** See the response to Specific Comment 60.4.

**60.21 COMMENT:** ORV users have used this area as a protest ground to fight all wilderness. BLM is correct in saying wilderness is the correct recommendation. Opening the area to ORV use is inviting another Buckhorn Draw, nearly destroyed by excessive use and little protection. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 60: CRACK CANYON WSA (CONTNUED)**

**60.21 RESPONSE:** Comment is noted. See the response to Specific Comment 60.4.

**60.22 COMMENT:** Unfortunately, extensive ORV destruction is also present in the WSAs in the San Rafael. I recently spent several days hiking in these areas and I am appalled at the damage BLM has permitted in areas the law requires to be managed in such manner as to maintain their wilderness characteristics. [Jack Spence]

**60.22 RESPONSE:** See the response to Specific Comment 59.34.

**60.23 COMMENT:** Title 24, Chapter 2 of the Utah Code requires me to be responsible for the suppression of uncontrolled fires on State-owned lands. The Draft Environmental Impact Statement allows for measures to control fire in a wilderness area when the fire threatens human life, property, or high-value resources on adjacent nonwilderness lands, or when the fire threatens to create unacceptable changes to the wilderness resource. Further, the statement assumes that fire fighting measures would be limited to aerial and hand methods. There are a total of 50 sections of State-owned land within the wilderness study areas in Emery County. This State in-held land creates a major conflict between my statutory duty to suppress uncontrolled fires on State-owned land and the limits placed upon me by wilderness designation to comply with that duty. I believe it is impractical to think that effective fire control could take place under those limitations and conditions. Adjacent to the study areas are 84 State-owned sections of land. More than within the WSAs, designation poses a greater conflict as regard to fire control to the adjacent areas. Effective fire control requires the officer in charge to make quick decisions regarding time and manner of control operations. If I must determine whether or not a fire within the wilderness area poses a threat to human life, property, or high-value resources on the adjacent land, I will use valuable time. Time that may make the difference between success and tragic failure. Further, the means which I am restricted to use, hand and aerial, would be drastically ineffective in fighting a fire which threatens human life, property, or high-value resources. [LaMar Guymon]

**60.23 RESPONSE:** See the response to Specific Comment 59.36.

**60.24 COMMENT:** Emergency care also falls within my duties. By declaring the land a wilderness BLM states that increased use will result. Increased use logically leads to an increase in accidents or emergencies. One would suppose that an increased risk of accidents or emergencies would require an increase in effectiveness in responding to the need. Under wilderness designation however, it is clear that vehicular travel within the area is prohibited. It may be implied from the limitation to hand and aerial methods of fighting fires that there would be severe restrictions and limitations in the manner in which emergencies or accidents could be handled in the wilderness area. I view these conflicts as significant problems inadequately addressed by BLM in their Draft EIS. I am opposed to the designation as wilderness of these study areas because of the limitations and restrictions placed upon my department when dealing with emergency situations, directly in conflict with my statutory duties. [LaMar Guymon]

**60.24 RESPONSE:** See the response to Specific Comment 59.37.

**60.25 COMMENT:** BLM has done a poor job in analyzing the present recreational use of the San Rafael Swell area. I don't believe they have any data to back up the numbers that they are putting in the EIS. Because of that, I got myself and the club in a little bit of trouble over Easter by putting up some signin boards in several areas of the San Rafael Swell to try to determine what some of the recreational usage levels were down there. My numbers indicate that there is at least a 5-to-1 ratio in favor of off-road vehicles. And I think BLM will have an extremely serious problem in trying to manage those areas if they are closed to off-road vehicles. [Dick Brass, Path Finders Motorcycle Club]

**60.25 RESPONSE:** See the response to Specific Comment 59.38. BLM estimates that there are approximately 1,500 visitor days of use in the WSA. Approximately two-thirds of the use is related to use of vehicles.

**60.26 COMMENT:** The Draft EIS states, "[t]his variation would have a negative impact on wildlife species and their habitat, especially if use were to increase and occur within critical lambing and water areas." This alone is reason enough to reject the "variation" alternative. The Draft EIS also notes that due to the WSA's small size, noise impacts from the "variation" alternative could be significant and, during

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 60: CRACK CANYON WSA (CONTNUED)**

times of high use, displace other recreationists "away from the area entirely." Obviously, this could create a tremendous impact on the educational and commercial outfitters presently using the WSA. [Utah Wilderness Association]

**60.26 RESPONSE:** See the response to Specific Comment 60.4.

**60.27 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to:

1. Protect the tax base.

2. Foster agriculture and industry, including mineral reduction and processing plants, together with uses.

3. Stabilize and improve property values.

We do not feel that the BLM Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine wilderness study areas as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possibly affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986, to become a matter of record. Quoting from Section C of this plan, I conclude: "C. Open Space - In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County, and accordingly, the county has adapted a zoning resolution in accordance with the earlier mentioned comprehensive plan and its accompanying statement of intent.

Further, Emery County positions itself:

1. To support the highest, economically allowable development of known mineral and energy resources throughout the county.

2. To utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable.

3. To maintain at least present levels of AUMs on public lands.

4. To preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands. Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statutes.

5. To support land exchanges within the county where they can be shown to be economically beneficial to the county, and only when the county officials are provided opportunities for input in the decision process.

6. To study intensively all areas included in the wilderness study areas 023, 054, 029A, 007, 045, 068 A, and 067, including drillings and other appropriate samples. While the county recognizes that there are areas in the county of critical environmental concern, not enough is known regarding subsurface minerals and resources. Under no circumstances will the county agree to any wilderness designations without a thorough analysis of all potential resource developments affected thereby. On these matters, the county intends to play a role in the decision making process as provided by law. [Emery County]

**60.27 RESPONSE:** See the response to Specific Comment 59.43.

**60.28 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that even though it acknowledges the presence of the Emery County Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accordingly, and in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**60.28 RESPONSE:** See the response to Specific Comment 25.23.

**60.29 COMMENT:** In a paper entitled "Discussion of an Option to Proposed Wilderness Designation on the San Rafael Swell" by the Emery County Economic



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 60: CRACK CANYON WSA (CONTNUED)**

Development Council the following statements are made: "We are taking the stand that some wilderness designation in Emery County is in the long term best interest of the county." "With few exceptions, we concur with the findings as they were published in the site specific analysis for each of these areas in March of 1983. We come to an even more complete concurrence with the recommended findings of the BLM, which proposes setting aside 366,345 acres in eight of the nine proposed Wilderness Study Areas." "Due to the geographic nature of the land that has been designated as wilderness, it has to be considered as wilderness. Accordingly, we would be acting irresponsibly if we were to discourage or oppose some wilderness designation in Emery County." "But we see in wilderness designation, some status that would encourage visitation of a broader audience than we are now receiving." "There is a certain portion of our County that is deserving preservation and protection." It is very disappointing to have local officials say one thing then do completely otherwise. To take a position that there will be no wilderness on the San Rafael does nothing towards resolving the wilderness issue on San Rafael. [Utah Wilderness Association]

**60.29 RESPONSE:** See the response to Specific Comment 59.45.

**60.30 COMMENT:** Crack Canyon WSA has both moderate wilderness-quality values and conflicts compared to the other WSAs in the San Rafael Swell region. The major conflicts are with uranium resources, high OHV use, and potential water developments. There are also wilderness values and wildlife habitat in the WSA which would benefit from wilderness management. [State of Utah]

**60.30 RESPONSE:** These values are discussed and analyzed in the Final EIS.

**60.31 COMMENT:** We believe that wilderness designations will negatively affect business opportunities elsewhere in the county, as well as directly remove significant acreages of Emery County from any future coal planning options. This process will permanently limit the economic growth potential of Emery County. [Consolidated Coal Company]

**60.31 RESPONSE:** Over the long term, wilderness designation would cause a slight change in local economic conditions from those which would occur with the No Action/No Wilderness Alternative. This situation would result from exploration and development

of uranium from valid mining claims in existence at the time of designation. Such claims could be developed but under more restrictive conditions than without wilderness. As a result, about 80 jobs would be created with uranium development in the Crack Canyon WSA with wilderness as opposed to approximately 160 jobs that would be created without wilderness. One hundred-sixty jobs would represent about 2.3 percent of the total projected Emery County workforce of 6,700 jobs by the year 2010 (Utah Office of Planning and Budget, 1987). The period or length of such employment is unknown. Other economic factors would not be affected by wilderness designation. Livestock grazing levels would not change as a result of wilderness, and recreational use is projected to increase at a rate of between 2 to 7 percent per year in the foreseeable future with or without wilderness. Other mineral resources known to exist or projected to exist within the WSA do not support a conclusion that significant development would occur without wilderness.

**60.32 COMMENT:** Why is Interstate 70 shown to border the WSA? Interstate 70 is 12 miles north. [Brian Wood]

**60.32 RESPONSE:** The Temple Mountain Road was inadvertently labeled as Interstate 70. The correction has been made for the maps in the Final EIS.

**60.33 COMMENT:** Page 27, Land Use Plans and Controls, Paragraph 1: 1,280 acres of adjacent State land, not 640 acres, have been identified for exchange (see page 4). [State of Utah]

**60.33 RESPONSE:** The comment is noted. However, the current policy of the Utah Board of State Lands and Forestry (USBL, 1987) is to reserve its position regarding exchange of State lands. Therefore, it is assumed that State lands would remain under existing ownership. [Emery County]

**60.34 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club v. Block cause us great concern. The availability of water will determine future growth. Accordingly, I submit to you with this statement, a copy of our resolution numbered 4-17-86 concerning Federal reserve water rights.

**60.34 RESPONSE:** The resolution is contained in the Final EIS in Volume VII-A.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 60: CRACK CANYON WSA (CONTNUED)**

**60.35 COMMENT:** In the discussion on uranium and associated minerals in the Draft EIS, the potential assessment is correct, there is potential for moderate to large size deposits. Exploration problems and cost do increase with depth, but the larger target potential encourages drilling depths from 2,000 to 2,500 feet. [State of Utah]

**60.35 RESPONSE:** This information has been added to the text of the Final EIS.

**60.36 COMMENT:** On page 8, the "Eocene Age" would be more precisely termed "Eocene Epoch," the age (million of years ago) of this movement might be worth including. [State of Utah]

**60.36 RESPONSE:** The suggested change has been made for the Final EIS. Citing the number of years would not add to the usefulness of the narrative.

**60.37 COMMENT:** On page 8, paragraph 2, Jurassic is misspelled. [State of Utah]

**60.37 RESPONSE:** The spelling has been corrected.

**SECTION 61**  
**MUDDY CREEK WSA**

**61.1 COMMENT:** I come from Maryland to Utah once every year or two to ride motorcycles and ATVs. The last time I was there I rode in Muddy Creek and the ever so popular Devils Canyon. I had the best time riding ever and so did my friend. I told all of my riding buddies to ride there if ever given the opportunity. This gave Utah a very good name in Maryland. Now, I understand that you are attempting to close these and many more areas in Utah. I disagree with you. I urge you to withdraw the bill and leave these areas alone. If not done so, you can expect a lot less tourists in Utah and one bad name here in the great State of Maryland. [Ron Blevins]

**61.1 RESPONSE:** The EIS identifies the ORV use which occurs in the San Rafael region. The EIS also describes wilderness values. BLM's findings are that the wilderness values outweigh ORV use in the Muddy Creek WSA and that ORV use should be allowed to continue on designated routes in Devils Canyon and vicinity.

**61.2 COMMENT:** A public hearing was held on November 13, 1985, "for the purpose of gathering public input on the wilderness designation of the San Rafael Swell area and possible alternatives to wilderness designation." At this time, I would like to submit the transcript of that hearing for the public record. At that public hearing a straw poll was conducted to determine which land use actions the public wished to pursue. Participants were asked to rank seven different options according to their personal preference. Each ranking was given a point value, with the first choice given seven points, and the last choice only one point. The results were as follows: The number one choice, with 584 points, was to "put all efforts into opposing wilderness designation on the Swell." The option of supporting wilderness designation on the Swell placed sixth, with 140 points. The least preferred alternative was to support a national park designation on the Swell. In order to represent the public interest as elected officials, the Emery County Commission issued a formal statement in which it was stated, "The Commission has concluded that it cannot support any designation upon the San Rafael Swell by any agency that would result in restrictive and exclusionary management practices beyond those practices currently employed by the Bureau of Land Management." In other words, we cannot support anything other than multiple use management of the Swell.

As public officials, we are obligated to represent the majority will of our county citizens. We feel we have done so in taking the position we have taken. [Emery County]

**61.2 RESPONSE:** See the response to Specific Comment 59.1.

**61.3 COMMENT:** BLM improperly eliminated mining claims and other potential conflicting uses during the inventory phase. [Sierra Club, Cache Group]

a. It appears that BLM has adjusted numerous boundaries around this WSA to accommodate mining claims. A review of the maps shows that 99 percent of the existing mining claims are outside of the BLM's wilderness proposal.

b. In addition to mining claims, it appears that BLM has omitted any lands which may vie for potential powerplant, railroad, or transmission line sites. We find it ironic that when the IPP Salt Wash plant was proposed in the 1970s, BLM suddenly found that any and all properties within any proposed utility

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 61: MUDDY CREEK WSA (CONTINUED)

corridor had no wilderness characteristics at all. [Sierra Club, Cache Group]

**61.3 RESPONSE:** See the response to General Comment 3.1. The presence of absence of mining claims or proposed activities was not a factor in determining WSA boundaries.

**61.4 COMMENT:** Keesle Country should be completely protected as in the UWC's proposal. BLM stated in its Intensive Inventory Narrative (May 9, 1979): "Keesle Country provides outstanding opportunities for solitude because the area is so finely divided by rows and cluster of rock formations, creating a forest of short, squat knobs, posts, and balanced rocks . . ." [Sierra Club, Cache Group]

**61.4 RESPONSE:** See the response to General Comment 3.1.

**61.5 COMMENT:** BLM's wilderness inventory decisions are erroneous. [Utah Wilderness Coalition and Raymond Wheeler]

a. The omission of 85 percent of the 215,000-acre Muddy Creek roadless area from BLM's wilderness review is the result of the badly mismanaged IPP Special Wilderness Inventory of 1979. The object of the inventory was to determine what portion of the roadless lands surrounding the proposed powerplant site (and the proposed coal-haul railroad and powerline right-of-ways) possessed wilderness characteristics. Instead of recognizing the obvious national and international significance of this wilderness resource, BLM concluded, in 1979, that some 75,000 acres of lands surrounding the proposed Salt Wash site "clearly and obviously" lacked wilderness character.

Clearly, BLM's sole reason for dropping this huge slice of rugged and exceptionally beautiful roadless land from wilderness study was to allow the construction of the proposed powerplant in Salt Wash. Yet the plant was never constructed at the Salt Wash site. Now BLM, in its Utah Wilderness Draft EIS, clings to its notion that the Salt Wash site must be omitted from a Muddy Creek wilderness recommendation. This is highly inappropriate. In doing so, BLM is sacrificing a wilderness resource of international importance because of a development proposal which has already been permanently abandoned. A full reevaluation of the Muddy Creek roadless area should be done with the goal of including these important fea-

tures: Cat Canyon, The Dike, Hebes Mt. and East Cedar Mtn., Keesle Country, Muddy Creek Gorge, Salt Wash, Wood Bench, Black Mountain, Moroni Slopes, Seger's Hole, North Caineville Mesa, North Cainville Reef, and Factory Butte.

b. The enormous 215,000-acre Muddy Creek, the second largest individual BLM roadless area in the state--was reduced to a mere 31,400-acre WSA by BLM to allow the construction of a coal-burning powerplant within the roadless area. Ironically, the Intermountain Power Project plant was eventually sited 100 miles away to the west near Delta, Utah. Many areas were drastically reduced in size by means of arbitrary boundary lines which follow precisely along the borders of mining claims. And a large number of roadless areas were simply excluded entirely from BLM's wilderness inventory because of mineral development potential or other perceived resource conflicts. These include: Colt Mesa, Horse Spring Canyon, Mud Spring, Nipple Bench, Squaw and Willis Creek, Hatch Wash, Harts Point, Duma Point, Spring Canyon Point, Hell & Roaring Canyon, Gravel and Long Canyon, Nokai Dome, Lake Canyon, Mike's Canyon, Hondu Country, Limestone Cliffs, Mussentuchit Badlands, Upper Muddy Creek, Wild Horse Mesa, White River Canyon and many, many other roadless areas too numerous to mention.

c. Muddy Creek Gorge is, incredibly, the single most impressive portion of Muddy Creek's magnificent canyon system and it has been entirely excluded from BLM's draft Muddy Creek wilderness recommendation. Below the southern boundary of BLM's Muddy Creek WSA, the stream enters the deepest canyon along its entire course where it cuts through the southern rim of the San Rafael Swell, winding between colorful, 1,000-foot high sandstone walls. This canyon is comparable in scale and grandeur to Zion Canyon. It is rimmed on either side by spectacular slickrock formations, including numerous domes divided by narrow slots barely an arms length wide. During the wilderness inventory BLM identified a "road" running up the bed of this canyon, and used that "road" to create an arbitrary boundary dividing its "Moroni Slopes" (UT-060-028A) roadless areas. On the east side of the canyon, BLM recommends wilderness designation for its "Crack Canyon WSA." Yet during the hasty accelerated inventory, BLM cut the west side of the canyon from its wilderness inventory, asserting that the west half of the canyon "clearly and obviously" lacks wilderness character. Our field team has thoroughly examined the old

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 61: MUDDY CREEK WSA (CONTINUED)

vehicle way in the bottom of Muddy Creek Gorge. While clearly visible in several places for short distances, this old jeep trail is neither a "road" nor a significant human impact. Indeed, for most of the canyon's length, the track either runs down the bed of the stream or, where located above the streambank, has been completely obliterated by erosion or so thoroughly revegetated that it is difficult to locate or recognize.

In truth, the separate "Crack Canyon," "Muddy Creek," and "Moroni Slopes" roadless areas identified by BLM are all part of a single enormous roadless area nearly a quarter of a million acres in size. By arbitrarily eliminating the lower gorge from its Muddy Creek wilderness recommendation, BLM has cut out the very heart of the Muddy Creek riparian corridor, inviting destructive development inside the core of the roadless area.

d. BLM correctly judges that the potential for oil and gas, tar sand, potash, or uranium developments is greatly outweighed by the extraordinary grandeur, scenic beauty, and exceptional wilderness values of the Muddy Creek roadless area. Unfortunately, BLM has arbitrarily omitted the vast majority of this roadless area from wilderness review so as to allow for the development of a coal-burning powerplant which was eventually constructed elsewhere. Nearly 200,000 acres of prime wilderness lands have been ejected from the mandated wilderness review program to allow for a development which will never occur! The Utah Wilderness Coalition requests BLM to formally reevaluate the entire roadless area, and to consider the large amount of new data gathered by the Coalition in developing a larger and more comprehensive Muddy Creek wilderness proposal which will protect the true extent of this magnificent wilderness.

e. BLM's exclusion of lands from wilderness inventory for the sole purpose of allowing mineral or other resource developments was highly inappropriate. The Wilderness Act, FLPMA, and numerous other legislation and administrative policy directives reiterate that Congress alone should weigh the merits of resource development against the merits of wilderness designation. BLM's role--as mandated by FLPMA--is to inventory wilderness lands, study their wilderness and nonwilderness potential, and report its findings to Congress. By prematurely eliminating vast tracts of pristine roadless land from the wilderness inventory, BLM has robbed Congress--and the American

public--of its most important prerogative. BLM has substituted its judgement for that of Congress and the American public. This is wrong.

**61.5 RESPONSE:** See the responses to General Comments 2.23 and 3.1.

**61.6 COMMENT:** The San Rafael Swell should be held under wilderness study protection until national park status can be carefully analyzed. [Wendell Anderson and John Lockhart]

a. I have some knowledge of the San Rafael area and am of the opinion that it merits national park status. It should be held under wilderness study protection until national park status can be carefully analyzed. The area should include all of the Sids Mountain and Mexican Mountain WSAs and additional wildlands and the more developed land around the Wedge, Buckhorn Draw, and along the San Rafael River. This could either be a new park or an addition to the Canyonlands and Capital Reef National Parks.

b. The San Rafael Reef and Swell should be a National Park. Until it becomes so, it should be protected by wilderness status. The small isolated areas proposed by BLM won't do it. It needs large areas to protect the integrity of this special place. To sacrifice this whole area so a few dirt bikers can have fun doesn't make sense. The All Wilderness Alternative must be adopted in all the WSAs around the San Rafael Reef and Swell.

**61.6 RESPONSE:** See the response to General Comment 3.30.

**61.7 COMMENT:** A so called "road" along Muddy Creek is really a largely washed out jeep track and human impacts to this date are unnoticeable. But interim protection can only be accomplished if the whole area which is truly eligible is included in the study area. The unique and varied landform in the Muddy Creek area will add enormously to the diversity and character of the Utah wilderness system. [Robert and Deanna Tubs Jr.]

**61.7 RESPONSE:** The road through the Muddy Creek Gorge is largely on State Section 17, T. 26 S., R. 9 E., and is not included in the WSA. In addition, it was determined to be a road during BLM's wilderness inventory. See the response to General Comment 3.1 and 6.4.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 61: MUDDY CREEK WSA (CONTINUED)**

**61.8 COMMENT:** This Muddy Creek WSA is also not accurate in that it does not mention that there are many numbers of old dirt roads through that area. There is an old dirt road almost 10 miles long that runs across my claim all the way from Tomsich Butte to Hidden Splendor. There are other dirt roads that come in from other areas and go almost to Hanksville. I don't even see these mentioned in the report or the other numerous dirt roads on my claims and other areas. [Mr. Johnson]

**61.8 RESPONSE:** The roads and other major imprints of man surrounding the Muddy Creek WSA were excluded during the wilderness inventory process. The 10 miles of dirt road between Tomsich Butte and Hidden Splendor are outside of the WSA boundary.

**61.9 COMMENT:** The only substantive suggestion I have regarding the boundary would be that you include the State section marked "The Hondo" and the adjacent Federal section "I" within the wilderness boundary. This will protect a significant entry point to Muddy Creek and the Chute from ORV damage and will give you a better boundary if and when the State section is transferred to Federal ownership. On my trips into the area, we always parked at the mouth of Red's Canyon, and it was evident that downstream only a few yards the country was really wilderness. That is certainly the way it should remain. [Robert Hassell]

**61.9 RESPONSE:** The two sections were excluded from the WSA during BLM's wilderness inventory. See the responses to General Comments 3.1 and 6.4.

**61.10 COMMENT:** BLM should acquire adjacent State lands for inclusion in the wilderness. [Utah Wilderness Coalition and John Isaacs]

a. BLM should aggressively pursue a land exchange with the State of Utah to acquire State-owned sections T. 25 S., R. 8 E., sec. 2 and T. 26 S., R. 9 E. sec. 16, both of which lie along the path of Muddy Creek. But the two sections identified are of unique importance because they lie at the living heart of the wilderness area, and they should therefore receive the highest priority for immediate acquisition and inclusion within the Muddy Creek WSA.

b. I request that BLM immediately take measures to acquire State-owned sections of land along the path of Muddy Creek. This wild, lovely river should be

protected along its entire length, especially in the 1,000-foot deep gorge it has carved through the San Rafael Reef.

**61.10 RESPONSE:** See the response to General Comment 6.4 and the information on State lands in Chapter 1 of Volume I.

**61.11 COMMENT:** We believe that there will be a direct negative effect on future mining opportunities at the Emery Mine (especially expanded production through surface mining) by these wilderness designations. BLM efforts to protect proposed high quality Class A scenery (e.g., Sids Mountain) or to protect visibility at the proposed VRM Class I areas will ultimately include attempts by the Federal Government to reduce fugitive dust emissions in Castle Valley and surrounding areas through the coal mining and air quality permitting processes. Requirements for fugitive dust controls above those currently practiced by the Utah coal industry will lead to additional production costs and constraints which would weaken the competitiveness of our Emery County reserves. [Consolidated Coal Company]

**61.11 RESPONSE:** See the response to Specific Comment 59.8.

**61.12 COMMENT:** The geologic formation identified as Coconino is probably the White Rim Sandstone. The "Eocene Age" would be more precisely termed "Eocene Epoch," the age (millions of years ago) of this movement might be worth including. [State of Utah]

**61.12 RESPONSE:** The suggested changes were made for the Final EIS.

**61.13 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**61.13 RESPONSE:** See the response to Specific Comment 59.14.

**61.14 COMMENT:** BLM's statement in Volume I (a rationalization for not selecting Vegetation as an issue) refers to threatened and endangered species by stating, "Because necessary measures would be taken to protect these species, it can be concluded that the viability of populations of threatened, endangered, or sensitive plant species would be preserved with any of the alternatives." This statement is flawed. The

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 61: MUDDY CREEK WSA (CONTINUED)**

Mexican Mountain SSA clearly indicates on page 40 (Vol. VI): "additional access would become established in the 12,850 acres of the WSA not designated. This could increase the threat to Sclerocactus wrightiae. The area not designated includes the one known site for this species. Also in the undesignated area, ORV use could eventually become established into the habitat area for Erigeron maguirei due to its proximity to Buckhorn Draw." [Utah Wilderness Association]

**61.14 RESPONSE:** See the response to Specific Comment 59.15.

**61.15 COMMENT:** Although BLM did recognize rare and sensitive plant species in the Draft EIS, the analysis was incomplete. The failure to identify vegetation as a major Statewide issue, particularly when three major issues deal with livestock grazing, shows a bias against natural values and an inconsistency in the selection of issues. [Utah Wilderness Association]

**61.15 RESPONSE:** See the response to General Comment 13.1. Impacts on vegetation including special status species is analyzed as an issue for the Muddy Creek WSA in the Final EIS.

**61.16 COMMENT:** The Final EIS should recognize the threat in the eight listed, proposed, and candidate threatened or endangered plant species if the area is opened to ORVs and other damaging uses. [Utah Wilderness Association]

**61.16 RESPONSE:** The EIS describes the presence of special status plant species. Also, it describes the required protection mandated by the Endangered Species Act.

**61.17 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. Accordingly, I submit to you with this statement, a copy of our resolution numbered 4-17-86 concerning federal reserve water rights. [Emery County]

**61.17 RESPONSE:** The resolution is contained in the Final EIS in Volume VII, Part A.

**61.18 COMMENT:** The Draft EIS is remiss in that it does not take into consideration the water salinity problem on the San Rafael, Muddy, and Price Rivers, and it further does not indicate how this problem will be dealt with if wilderness is designated on these

streams. Because these bodies of water and tributaries to these bodies are major contributors to the Colorado River salinity problem and because the Bureau of Reclamation has been given the charge of solving the salinity problem and because the Sierra Club vs. Block decision regarding a Federal reserve water right may have a major impact on what can be done, it is felt that there should be no wilderness recommendation made nor should there be any wilderness designated until these issues are addressed and resolved favorably to Emery County. [Emery County]

**61.18 RESPONSE:** See the response to Specific Comment 59.18.

**61.19 COMMENT:** Our Emery reserve is located on upstream watersheds of streams which flow through the the proposed wilderness areas. A wilderness designation would impart to the Federal Government a reserved right to all unappropriated waters which flow through the wilderness area. This water right is considered superior to the rights of all future appropriators. Such a restriction could mean that water would be unavailable for future mining needs, including coal cleaning, dust suppression, drinking water, and irrigation during reclamation, and thus eliminate the possibility of future mine expansions. [Consolidated Coal Company]

**61.19 RESPONSE:** See the response to Specific Comment 60.15 concerning water uses upstream of the Muddy Creek WSA.

**61.20 COMMENT:** The EIS should point out that wilderness designation in the San Rafael Swell would lead to stricter air and water quality standards that would interfere with industry. [Emery County and Consolidated Coal Company]

a. The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal Government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions.

Future mineral production could be hindered by regulation of water running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 61: MUDDY CREEK WSA (CONTINUED)**

b. Enhancing water quality of streams flowing through wilderness management. Efforts to improve water quality will likely be directed at upstream point source discharges, which will include coal mine discharges. More stringent effluent limitations applied to coal mines through the NPDES permitting process would likely increase production costs and possibly preclude future mine expansions.

**61.20 RESPONSE:** See the responses to Specific Comments 59.21 and 60.15.

**61.21 COMMENT:** UP&L has a pending water right in the Muddy Creek basin for 30,000-acre feet of storage for use in a proposed steam electric generating plant. Because of the threat posed to UP&L and all other water users near the WSAs by wilderness designation, which is not quantified in the Draft EIS, UP&L categorically opposes any Utah wilderness designations until the EIS is revised to discuss all possible impacts on existing water rights and application, as well as future impacts on unappropriated water unless the legislation authorizing wilderness designations expressly disclaims any Federal reserved water rights for the areas and prohibits assertion of claims which may be made regarding water flows or quality in, through, or below the areas. [Utah Power and Light]

**61.21 RESPONSE:** See the response to Specific Comment 60.15.

**61.22 COMMENT:** Emery County has vast natural resources in the San Rafael Swell. There are millions of barrels of oil in the tar sand within the WSA. The San Rafael tar sand deposit (parts of T. 23, 24 S, R. 9, 10, 11E.) contains measured reserves of 300 million barrels of oil in place in 25,600 acres plus another 250 million barrels of speculative reserves in another 25,600 acres (Major Tar Sand and Heavy Oil Deposits in the U.S., Interstate Oil Compact Comm., 1984, p.255). This large tar sand reserve is in jeopardy of never being developed if any of the surrounding WSAs are designated as wilderness. The reason for this is the possibility of development impacts on visual vistas in areas that can be seen from the wilderness lands. If these visual vistas are ever used—then forget any tar sand development at any time in the future. [Southeastern Utah Association of Local Governments]

**61.22 RESPONSE:** See the response to Specific Comment 59.23. The Muddy Creek WSA is not within

the San Rafael Swell Special Tar Sand Area and production of the tar sand is not expected in the foreseeable future regardless of wilderness designation.

**61.23 COMMENT:** There is potential for large size ore bodies of uranium and associated minerals. It should be noted that remoteness and terrain conditions did not preclude exploration in this part of the San Rafael Swell in the late 1970s. Furthermore, the nomination of the WSAs in the late 1970s precluded systematic evaluations of uranium potential; the area is, therefore, not adequately explored. [State of Utah]

**61.23 RESPONSE:** The Final EIS recognizes the possibility that large uranium ore bodies (greater than 1,000 metric tons) may exist in the WSA.

**61.24 COMMENT:** We anticipate that future Federal coal leasing decisions, which are essential for a stable coal mining industry in Utah, will be negatively influenced by BLM's responsibilities to maintain and improve air and water quality in designated wilderness areas. This conflict will increase pressures on BLM to delete certain coal tracts from the competitive leasing process if it is perceived that development may have negative impacts on wilderness values. Future coal production throughout Utah will be reduced by this process. [Consolidated Coal Company]

**61.24 RESPONSE:** See the response to Specific Comment 59.26.

**61.25 COMMENT:** The record indicates the OIR (3+) rating is exaggerated. The only mineral with more than a very low potential for development in the WSA is uranium. The Draft EIS indicates that roughly only 2,000 acres of the WSA are covered by valid mining claims. If the potential is so great (f4), why is so little of the WSA claimed? While some uranium has been produced in the area, all of the mines and associated developments identified in the SAI report are outside the WSA's eastern boundary. The lack of valid claims or past development, the extremely rough topography, and the pessimistic outlook for uranium markets even in favorable areas, add up to a lower OIR. [Utah Wilderness Association]

**61.25 RESPONSE:** The OIR mineral rating system has not been used for the Final EIS, as explained in the response to General Comment 15.7. However, in 1982, Science Applications, Inc., rated the uranium resource in the Muddy Creek WSA as f4/c4,

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 61: MUDDY CREEK WSA (CONTINUED)

indicating that there is a high favorability with a high degree of certainty that large deposits (greater than 1,000 metric tons) of uranium oxide exist in the WSA. This rating is due to the numerous uranium mines near the northeastern and southern boundary of the WSA.

**61.26 COMMENT:** The Draft EIS states that, "vegetation is also a limiting factor due to low density, limited species composition, and bare rock surfaces." This statement is false. It is possible that vegetation may be a limiting factor for some species. It is not possible, however, to conclude that a simple plant community of relatively uncommon plants is limiting to animals. In other words, the only way that vegetation can be determined to be a limiting factor for particular animal species is to analyze plant-animal interactions. Limiting factors cannot be inferred through a summary of plant characteristics. [Scott Mills]

**61.26 RESPONSE:** Vegetation is a limiting factor. The amount and composition of vegetation has a direct relationship on the availability of food and cover for various wildlife species. Also, see the response to General Comment 16.12.

**61.27 COMMENT:** Although one may appreciate BLM's attempt to determine ways in which wildlife habitat may be improved, the attempt must be tempered with reality. Several WSAs state that water or some other resource factor "limits" wildlife in the WSA and that an improvement or manipulation of the limiting factor will be beneficial to wildlife. Although resource population limitation has been a traditional tenet in wildlife biology, Wiens (1984) reviews the subject and concludes that "there is surprisingly little direct evidence of clear resource limitation in natural populations (page 417)." If there are only a handful of studies demonstrating unambiguous limiting factors for single populations, then it is spectacularly unfounded to assert that a limiting factor affects communities of animals. The data available is simply not sufficient to define such a unifying concept for communities. From a land use or management standpoint, BLM's use of limiting factors is especially misleading because it creates the impression that the proposed manipulation or improvement will benefit all wildlife. A given resource such as water may be limiting for one or two species, but until much more data is available, there is no basis to propose a limiting factor for the wildlife in a WSA. [Scott Mills]

**61.27 RESPONSE:** See the responses to General Comments 16.12, 16.13, and 16.20.

**61.28 COMMENT:** The Final EIS should recognize the reintroduction of desert bighorn sheep into the WSA and the importance of wilderness designation to these animals. [Utah Wilderness Association]

**61.28 RESPONSE:** The EIS notes the presence of bighorn sheep in the vicinity of the WSA. It also explains that none of the WSA is crucial habitat for bighorn sheep.

**61.29 COMMENT:** Title 24, Chapter 2 of the Utah Code requires me to be responsible for the suppression of uncontrolled fires on State-owned lands. The Draft Environmental Impact Statement allows for measures to control fire in a wilderness area when the fire threatens human life, property, or high-value resources on adjacent nonwilderness lands, or when the fire threatens to create unacceptable changes to the wilderness resource. Further, the statement assumes that fire fighting measures would be limited to aerial and hand methods. There are a total of 50 sections of State-owned land within the wilderness study areas in Emery County. This State in-held land creates a major conflict between my statutory duty to suppress uncontrolled fires on State-owned land and the limits placed upon me by wilderness designation to comply with that duty. I believe it is impractical to think that effective fire control could take place under those limitations and conditions. Adjacent to the study areas are 84 State-owned sections of land. More than within the WSA, designation poses a greater conflict as regard to fire control to the adjacent areas. Effective fire control requires the officer in charge to make quick decisions regarding time and manner of control operations. If I must determine whether or not a fire within the wilderness area poses a threat to human life, property, or high-value resource on the adjacent land, I will use valuable time. Time that may make the difference between success and tragic failure. Further, the means which I am restricted to use, hand and aerial, would be drastically ineffective in fighting a fire which threatens human life, property, or high-value resources. [LaMar Guymon]

**61.29 RESPONSE:** See the response to Specific Comment 59.36.

**61.30 COMMENT:** Emergency care also falls within my duties. By declaring the land a wilderness, BLM



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 61: MUDDY CREEK WSA (CONTINUED)

states that increased use will result. Increased use logically leads to an increase in accidents or emergencies. One would suppose that an increased risk of accidents or emergencies would require an increase in effectiveness in responding to the need. Under wilderness designation, however, it is clear that vehicular travel within the area is prohibited. It may be implied from the limitation to hand and aerial methods of fighting fires that there would be severe restrictions and limitations in the manner in which emergencies or accidents could be handled in the wilderness area. I view these conflicts as significant problems inadequately addressed by BLM in their Draft EIS. I am opposed to the designation as wilderness of these study areas because of the limitations and restrictions placed upon my department when dealing with emergency situations, directly in conflict with my statutory duties. [LaMar Guymon]

**61.30 RESPONSE:** See the response to Specific Comment 59.37.

**61.31 COMMENT:** The Chute section of Muddy Creek frequently has a 4-week period that is suitable for boating, and this section is suitable for boaters of intermediate ability. Your report lists this area as being suitable for boating only about 1 week a year and as being suitable for experts only. This statement is incorrect. The Black Boxes are also suitable for boaters of intermediate ability when this area is boated at lower water levels. I have kayaked through both of these areas. [Doyle Dow]

**61.31 RESPONSE:** The Final EIS has been revised to indicate that the boating period may be from 1 to 4 weeks, depending on the water run-off conditions. The EIS did not state that floating the Muddy Creek is suitable for experts only. Rather, it correctly stated that technical maneuvering is required by the floater.

**61.32 COMMENT:** BLM has done a poor job in analyzing the present recreational use of San Rafael Swell area. I don't believe they have any data to back up the numbers that they are putting in the EIS. Because of that, I got myself and the club in a little bit of trouble over Easter by putting up some sign-in boards in several areas of the San Rafael Swell to try to determine what some of the recreational usage levels were down there. My numbers indicate that there is at least a 5-to-1 ratio in favor of off-road vehicles. And I think BLM will have an extremely serious problem in trying to manage those areas if

they are closed to off-road vehicles. [Dick Brass, Path Finders Motorcycle Club]

**61.32 RESPONSE:** See the response to Specific Comment 59.38. Because of rugged terrain and the lack of access, most of the use in the Muddy Creek WSA is primitive in nature rather than mechanized.

**61.33 COMMENT:** Unfortunately, extensive ORV destruction is also present in the WSAs in the San Rafael. I recently spent several days hiking in these areas and I am appalled at the damage BLM has permitted in areas the law requires to be managed in such manner as to maintain their wilderness characteristics. [Jack Spence]

**61.33 RESPONSE:** See the response to Specific Comment 59.34.

**61.34 COMMENT:** BLM's proposed 31,400-acre Muddy Creek wilderness represents less than 15 percent of the pristine wildlands and the scenic and geologic wonders in the area. [Utah Wilderness Coalition]

**61.34 RESPONSE:** The BLM inventory determined which areas met the criteria for wilderness study and these were identified as WSAs. Areas outside the WSA do not meet the basic criteria. The "scenic and geologic wonders" are not mandatory wilderness criteria, but they may be considered to be special or supplemental features within the WSA.

**61.35 COMMENT:** Wild and Scenic River status should be pursued for the entire length of the river. Wilderness designation will promote this protection. [Sierra Club, Cache Group]

**61.35 RESPONSE:** Muddy Creek is listed as a National Rivers Inventory Segment for study as a potential addition to the National Wild and Scenic Rivers System (USDI, National Park Service, 1982.) A preliminary evaluation of Muddy Creek's potential for inclusion the Wild and Scenic Rivers System is being conducted during preparation of the San Rafael RMP.

**61.36 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to:

1. Protect the tax base.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 61: MUDDY CREEK WSA (CONTINUED)**

2. Foster agriculture and industry, including mineral reduction and processing plants, together with uses.

3. Stabilize and improve property values.

We do not feel that the BLM Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine wilderness study areas as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possibly affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986 to become a matter of record. Quoting from Section C of this plan, I conclude: "C. Open Space - In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County and accordingly, the county has adapted a zoning resolution in accordance with the earlier mentioned comprehensive plan and its accompanying statement of intent.

Further, Emery County positions itself:

1. To support the highest, economically allowable development of known mineral and energy resources throughout the county.

2. To utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable.

3. To maintain at least present levels of AUMs on public lands.

4. To preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands. Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statutes.

5. To support land exchanges within the county where they can be shown to be economically beneficial to the county, and only when the county officials are provided opportunities for input in the decision process.

6. To study intensively all areas included in the wilderness study areas 023, 054, 029A, 007, 045, 068 A, and 067, including drillings and other appropriate samples. While the county recognizes that there are areas in the county of critical environmental concern, not enough is known regarding subsurface minerals and resources. Under no circumstances will the county agree to any wilderness designations without a thorough analysis of all potential resource developments affected thereby. On these matters, the county intends to play a role in the decision making process as provided by law. [Emery County]

**61.36 RESPONSE:** See the response to Specific Comment 59.43.

**61.37 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that even though it acknowledges the presence of the Emery County Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accordingly, and in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**61.37 RESPONSE:** See the response to Specific Comment 25.23.

**61.38 COMMENT:** In a paper entitled "Discussion of an Option to Proposed Wilderness Designation on the San Rafael Swell" by the Emery County Economic Development Council the following statements are made: "We are taking the stand that some wilderness designation in Emery County is in the long term best interest of the county." "With few exceptions, we concur with the findings as they were published in the site specific analysis for each of these areas in March of 1983. We come to an even more complete concurrence with the recommended findings of the BLM, which proposes setting aside 366,345 acres in eight of the nine proposed Wilderness Study Areas." "Due to the geographic nature of the land that has been designated as wilderness, it has to be considered as wilderness. Accordingly, we would be acting irresponsibly if we were to discourage or oppose some

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 61: MUDDY CREEK WSA (CONTINUED)**

wilderness designation in Emery County." "But we see in wilderness designation, some status that would encourage visitation of a broader audience than we are now receiving." "There is a certain portion of our County that is deserving preservation and protection." It is very disappointing to have local officials say one thing then do completely otherwise. To take a position that there will be no wilderness on the San Rafael does nothing towards resolving the wilderness issue on San Rafael. [Utah Wilderness Association]

**61.38 RESPONSE:** See the response to Specific Comment 59.45.

**61.39 COMMENT:** In Volume I, it is indicated that "Utah's mining industry now accounts for less than 3 percent of the State's total employment." In Emery County, over 50 percent of the local work force is either in mining or a utility-related position. The Draft EIS indicates that Emery County is one of six counties that could have "the greatest potential for significant impacts resulting from designation" yet the BLM Proposed Action does not appear to take this into consideration. We ask that BLM carefully weigh their recommendations and decisions as they complete their Final EIS. [Emery County]

**61.39 RESPONSE:** See the response to Specific Comment 59.47.

**61.40 COMMENT:** We believe that wilderness designations will negatively affect business opportunities elsewhere in the county as well as directly remove significant acreages of Emery County from any future coal planning options. This process will permanently limit the economic growth potential of Emery County. [Consolidated Coal Company]

**61.40 RESPONSE:** The EIS analysis indicates that over the long term, wilderness designation would cause a slight change in local economic conditions from those which would occur with the No Action/No Wilderness Alternative. This situation would result from exploration and development of uranium from valid mining claims in existence at the time of wilderness designation. Such claims could be developed, but under more restrictive conditions than without wilderness. As a result, about 40 jobs would be created with uranium development in the Muddy Creek WSA with wilderness as opposed to approximately 80 jobs that would be created without wilderness. Eighty jobs would represent 1.2 percent of the total projected Emery County work force of 6,700 jobs by the year

2010 (Utah Office of Planning and Budget, 1987). The period or length of such employment is unknown. Other economic factors would not be affected by wilderness designation. Livestock grazing levels would not change as a result of wilderness, and recreational use is projected to increase at a rate of between 2 to 7 percent per year in the foreseeable future with or without wilderness. Other mineral resources known to exist or projected to exist within the WSA do not support a conclusion that significant development would occur without wilderness.

**61.41 COMMENT:** Muddy Creek WSA has both moderate wilderness-quality values and conflicts compared to the other WSAs in the San Rafael Swell region. The major conflicts are with mineral values, uranium, gypsum resources (UGMS Bulletin 73, pp. 177-185), and potential water resource development. If the Muddy Creek trail can be maintained, designation would have less impact on livestock grazing. However, there are some wilderness values and wildlife habitats that are unique to the WSA and region. [State of Utah]

**61.41 RESPONSE:** BLM's Proposed Action for the WSA is the All Wilderness Alternative. The Muddy Creek livestock trail would continue to be used and maintained in the same manner as in the past, based on practical necessity and reasonableness.

**SECTION 62**  
**DEVILS CANYON WSA**

**62.1 COMMENT:** I come from Maryland to Utah once every year or two to ride motorcycles and ATVs. The last time I was there I rode in Muddy Creek and the ever so popular Devils Canyon. I had the best time riding ever and so did my friend. I told all of my riding buddies to ride there if ever given the opportunity. This gave Utah a very good name in Maryland. Now, I understand that you are attempting to close these and many more areas in Utah. I disagree with you. I urge you to withdraw the bill and leave these areas alone. If not done so, you can expect a lot of less tourists in Utah and one bad name here in the great State of Maryland. [Ron Blevins]

**62.1 RESPONSE:** See the response to Specific Comment 61.1.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

**62.2 COMMENT:** A public hearing was held on November 13, 1985, "for the purpose of gathering public input on the wilderness designation of the San Rafael Swell area and possible alternatives to wilderness designation." At this time I would like to submit the transcript of that hearing for the public record. At that public hearing a straw poll was conducted to determine which land use actions the public wished to pursue. Participants were asked to rank seven different options according to their personal preference. Each ranking was given a point value, with the first choice given seven points, and the last choice only one point. The results were as follows: The number one choice, with 584 points, was to "put all efforts into opposing wilderness designation on the Swell." The option of supporting wilderness designation on the Swell placed sixth, with 140 points. The least preferred alternative was to support a national park designation on the Swell. In order to represent the public interest as elected officials, the Emery County Commission issued a formal statement in which it was stated, "The Commission has concluded that it cannot support any designation upon the San Rafael Swell by any agency that would result in restrictive and exclusionary management practices beyond those practices currently employed by the Bureau of Land Management." In other words, we cannot support anything other than multiple use management of the Swell.

As public officials, we are obligated to represent the majority will of our county citizens. We feel we have done so in taking the position we have taken. [Emery County]

**62.2 RESPONSE:** See the response to Specific Comment 59.1.

**62.3 COMMENT:** Originally this WSA contained more than 24,000 acres. In the inventory, BLM deleted large natural areas outside the present WSA. Recent field visits by volunteers validate that BLM inaccurately assessed the human impacts found outside the present WSA deleting areas in the inventory. We request that BLM consider for wilderness additional natural areas outside the present boundary for wilderness designation. In the west the Devils Canyon WSA boundary starts 3 miles from the nearest impact. BLM's impact analysis map shows no impacts in this area. On the north between the WSA boundary and the freeway, BLM shows some vehicle ways on their map. These routes have been closed for use since the construction of the freeway. They are not now evi-

dent on the ground. They are not significant impacts justifying the deletion of this area from wilderness study. North of Kimball Draw and Cat Canyon, BLM deletes nearly 2,500 acres because of a jeep track that goes for 3 miles along a ridge. This track is not maintained and has not received regular use. There is no regular activity that justifies retention of this route as open. The impacts of this route do not significantly affect the area for it is almost reclaimed to a natural state. BLM cannot justify deletion of the entire southern side of this area because of this single impact. BLM deletes from wilderness study the large natural area surrounding the upper part of Link Flats Natural Area. In the inventory, BLM was required to assess the wilderness values of natural areas with the adjacent roadless lands. BLM failed to do this. Nothing in the record shows BLM followed this regulation.

In the Draft EIS, BLM shows a route going between the two Link Flat areas within the Coalition's Devils Canyon wilderness proposal north to Sagebrush Bench. This route has not seen use for several years. Our volunteers have visited this area each year and monitored this route. The route is completely overgrown and shows no evidence of any use for approximately 3 years. There is no maintenance and the area appears completely natural. BLM cannot claim that this is an impact justifying the deletion of this area from study. [Utah Wilderness Coalition]

**62.3 RESPONSE:** See the response to General Comment 3.1.

**62.4 COMMENT:** BLM should consider a Partial Wilderness Alternative for the Devils Canyon WSA. [Sierra Club, Cache Group; Jack Spence; John Veranth]

a. The ORV impacts mentioned by BLM in the Draft EIS seem to be practically nonexistent. Even so, BLM says that only 660 acres are impacted. These areas, which are on the edge of the WSA are: (1) Justensen Flats; (2) Sagebrush Bench; and (3) Kimball Junction. If this is the case, then why not simply remove those 660 acres and designate the remaining lands as wilderness. To protect the wilderness values then, however, those 660 acres would have to be closed to ORV use.

b. This WSA has been recommended for No Action (nonwilderness). The first reason for this action is ORV use of Justensen Flats, Sagebrush Bench, and

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

Kimball Draw. According to the map, little, if any, of these areas are in fact located within the WSA, and therefore this reason is invalid. Minor adjustments in boundaries could take care of the small area impacted. Furthermore, since BLM maintains ORV use is compatible with WSA status, it cannot now exclude a WSA for damage caused by its own policies.

c. For the Devils Canyon WSA, a Partial Wilderness Alternative should have been analyzed. This area is significant as it is one of the few potential wilderness areas which is easily accessible from an all weather road. During the winter, hiking opportunities in southern Utah are limited more by road conditions than by the weather. Based on the analysis in the Draft EIS, most of the ORV impact is near the perimeter of the area and much of the canyon has wilderness value.

**62.4 RESPONSE:** No partial alternative was considered for the Devils Canyon WSA because any partial wilderness configuration would not overcome the impacts of outside sights and sources from the adjacent I-70. Refer to Appendix 11 in Volume I for a summary of rationale for BLM's Proposed Actions.

**62.5 COMMENT:** The San Rafael Swell should be held under wilderness study protection until national park status can be carefully analyzed. [Wendall Anderson and John Lockhart]

a. I have some knowledge of the San Rafael area and am of the opinion that it merits national park status. It should be held under wilderness study protection until national park status can be carefully analyzed. The area should include all of the Sids Mountain and Mexican Mountain WSAs and additional wildlands, and the more developed land around the Wedge, Buckhorn Draw, and along the San Rafael River. This could either be a new park or an addition to the Canyonlands and Capital Reef National Parks.

b. The San Rafael Reef and Swell should be a national park. Until it becomes so, it should be protected by wilderness status. The small isolated areas proposed by BLM won't do it. It needs large areas to protect the integrity of this special place. To sacrifice this whole area so a few dirt bikers can have fun doesn't make sense. The All Wilderness Alternative must be adopted in all the WSAs around the San Rafael Reef and Swell.

**62.5 RESPONSE:** See the response to General Comment 3.30.

**62.6 COMMENT:** BLM's rationale for their Proposed Action are not valid. [Utah Wilderness Coalition]

a. BLM's recommendation of nonwilderness comes without any rationale. In the earlier study process, BLM wanted to drop this area because of "outside sights and sounds" and the "management problems with ORVs." Comments submitted to BLM convinced them that this was wrong. Congress ruled you cannot drop areas because cars on boundary roads are evident in part (in this case a tiny fraction).

b. The BLM recommendation as unsuitable for designation as wilderness centers on three arguments. The first alleges that "outside sights and sounds" affect wilderness visitors within the area. The second argument mentions BLM believes that management of ORVs is "difficult" in a wilderness area. Both of these arguments cover less than 1 percent of the area, yet supposedly justify BLM's recommendation of unsuitability for the whole area. The last argument contends that there is a high potential for uranium within the WSA. The issues raised by BLM are not accurately described nor do they present significant reasons preventing wilderness recommendation. [Utah Wilderness Coalition]

**62.6 RESPONSE:** The rationale for the BLM Proposed Action is summarized in the Final EIS, Appendix 11 in Volume I. Also see the responses to General Comments 8.19 and 8.24.

**62.7 COMMENT:** The Draft EIS Volume I states, "WSAs contain about 2 percent of the State total of ORV trails . . . the total miles of ORV routes within WSAs would remain relatively small when compared to the total miles within southern Utah and the State as a whole." Yet, the Draft EIS several times, especially in Devils Canyon and Rockwell WSAs, uses ORV use to justify a nonwilderness recommendation. Since wilderness designation will not adversely affect ORV recreationists, BLM should discount any ORV use concerns and actively pursue enforcement of regulations that keep ORVs out of wilderness areas. [Sierra Club, Cache Group]

**62.7 RESPONSE:** See the response to Specific Comment 5.6 for the Rockwell WSA. Although ORV use is not considered a Statewide issue, it is an issue for specific WSAs. For Devils Canyon WSA, ORV use is an

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

issue, but the major reason for the No Action/ No Wilderness recommendation is the impact of outside sights.

**62.8 COMMENT:** There is only a superficial description of the mode of emplacement of the intrusive rocks. Information necessary for even basic economic geological determinations include what types of rocks were emplaced, what are the contacts with the country rocks like, and what alternations exist. Details of this nature are vital to assess economic potential. [State of Utah]

**62.8 RESPONSE:** Geologic information has been revised in the Geology and Topography and Minerals sections of the Final EIS.

**62.9 COMMENT:** The "Eocene Age" would be more precisely termed "Eocene Epoch," the age (millions of years ago) of this movement might be worth including. [State of Utah]

**62.9 RESPONSE:** The suggested change has been made for the Final EIS.

**62.10 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**62.10 RESPONSE:** Information on fossil resources has been added for the Final EIS.

**62.11 COMMENT:** BLM's statement in Volume I (a rationalization for not selecting Vegetation as an issue) refers to threatened and endangered species by stating, "Because necessary measures would be taken to protect these species, it can be concluded that the viability of populations of threatened, endangered, or sensitive plant species would be preserved with any of the alternatives." This statement is flawed. The Mexican Mountain SSA clearly indicates on page 40 (Vol. VI): "additional access would become established in the 12,850 acres of the WSA not designated. This could increase the threat to Sclerocactus wrightiae. The area not designated includes the one known site for this species. Also in the nondesignated area, ORV use could eventually become established into the habitat area for Erigeron maguirei due to its proximity to Buckhorn Draw. [Utah Wilderness Association]

**62.11 RESPONSE:** See the response to Specific Comment 59.15.

**62.12 COMMENT:** Although BLM did recognize rare and sensitive plant species in the Draft EIS, the analysis was incomplete. The failure to identify vegetation as a major Statewide issue, particularly when three major issues deal with livestock grazing, shows a bias against natural values and an inconsistency in the selection of issues. [Utah Wilderness Association]

**62.12 RESPONSE:** See the response to General Comment 13.1. Impacts on vegetation including special status species is analyzed as an issue for the Devils Canyon WSA in the Final EIS.

**62.13 COMMENT:** UP&L is very concerned also about the effect of air quality restrictions from wilderness areas in the vicinity of its existing Hunter and Huntington plants located in Emery County. The table below lists the WSAs that are in close proximity to the Hunter and Huntington plants. These WSAs and their future affect on UP&L's operations should be considered for each alternative. [Utah Power and Light]

WSA	Name	Distance	
		From Hunter	From Huntington
62	Devils Canyon	21 S	32 S
63	Sids Mountain	10 SE	20 SE
64	Mexican Mountain	23 SE	30 SE
61	Muddy Creek	34 S	43 S
60	Crack Canyon	41 SE	52 SE
59	San Rafael Reef	31 SE	42 SE
65	Jack Canyon	58 NE	54 NE
66	Desolation Canyon	39 ENE	41 ENE
67	Turtle Canyon	40 ENE	40 ENE
68	Floy Canyon	54 ESE	56 WSA
29	Phipps-Death Hollow	98 SSW	111 SSW
31	No. Escalante Canyon	86 SSW	97 SSW
30	Steep Creek	89 SSW	100 SSW

**62.13 RESPONSE:** See the responses to General Comments 10.3 and 10.5.

**62.14 COMMENT:** The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal Government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions. Future mineral production could be hindered by regulation of water running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation. [Emery County]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

**62.14 RESPONSE:** See the response to Specific Comment 59.21. The Devils Canyon WSA does not have perennial streams and would not be affected by upstream developments.

**62.15 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. Accordingly, I submit to you with this statement a copy of our resolution numbered 4-17-86 concerning Federal reserve water rights. [Emery County]

**62.15 RESPONSE:** The resolution is contained in the Final EIS, Volume VII-A.

**62.16 COMMENT:** Being that the San Rafael and the tributaries to the San Rafael are major contributors to the Colorado River salinity problem, we are concerned with what measures might be taken if downstream areas are designated wilderness. [Emery County]

**62.16 RESPONSE:** The Devils Canyon WSA does not have perennial streams. Also, see the response to Specific Comment 59.18.

**62.17 COMMENT:** Although no water was running when we visited, many areas along the creek dropped abruptly, causing, in times of water, spectacular waterfalls and pools. We found extremely small amounts of human evidence within the WSA (no litter, graffiti, etc.) [Richard Campanella]

**62.17 RESPONSE:** The comment is noted, however, the naturalness decision points to the fact that there are ORV trails and camps in the WSA.

**62.18 COMMENT:** Why are factors for uranium in the WSA "not positive"? The area is underlain by favorable stratigraphic units. Certainty of encountering commercial uranium deposits can only be established by systematic exploration. The 700 to 2,000 foot overburden depths mentioned in the Draft EIS are well within the scope of existing exploration and mining technology. The temporary low price of uranium alone makes this area "presently uneconomical to mine." [State of Utah]

**62.18 RESPONSE:** In 1982, Science Applications, Inc. Rated the uranium resources in the WSA as f4/c2, which means that there is a high favorability but a relatively low certainty that uranium exists. How-

ever, SAI indicated that if uranium ore bodies exist they would be small and discontinuous which would make them uneconomical at depths of 200 to 2,000 feet.

**62.19 COMMENT:** BLM has overstated the potential conflict of wilderness designation with uranium production in the Devils Canyon WSA. [Utah Wilderness Coalition]

a. BLM misrepresents the seriousness of mineral development in this area. BLM states that there are uranium- and vanadium-bearing strata in the WSA. After concluding that this is an infeasible development, BLM then states that one of the impacts of wilderness is that "recovery of 1,000 tons of uranium oxide is high" and is a "significant consequence" of wilderness designation. BLM incorrectly placed infeasible conflicts in a table reserved for significant conflicts. BLM is correct in finding uranium development an insignificant conflict. The geologic nature of the deposit, the limitations of extraction, and the economic considerations clearly support this conclusion. But the BLM use of this mineral as a consequence violates the study requirement to be consistent in analysis and in the decision process. We request that BLM remove all insignificant conflicts from Table 1 and from the conclusions concerning the recommendation.

b. With the exception of uranium and vanadium (usually found together), all other mineral development potential is found to be low. Uranium deposits of commercial values and quantity have not been positively identified even though substantial drilling has occurred on the southern portion of the WSA just south of the present boundary. The favorable units in the Chinle Formation containing uranium ore potential lie more than 700 feet below the surface. Deep mining, possible from outside the unit, would be extremely expensive and under foreseeable limitation, infeasible. High uranium concentrations are less likely in this part of the Chinle Formation than elsewhere within the San Rafael Swell. The geologic conditions described in USGS Bulletin 1239 leading to the high concentrations of ore are rare within this WSA. The demand for uranium will continue to decrease as political and economic pressures reduce the uses for this resource. Confronted with the enormous problems of this industry and the more easily attainable deposits outside the WSA, uranium and vanadium deposits do not conflict with a wilderness designation. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

**62.19 RESPONSE:** The Final EIS indicates that no mineral exploration or extraction is expected in the Devils Canyon WSA with either the All Wilderness Alternative or the No Action/No Wilderness Alternative.

**62.20 COMMENT:** Small precious metal deposits can still be of significant economic and strategic value. [State of Utah]

**62.20 RESPONSE:** Available information does not support the contention that valuable or economic mineral deposits exist within the WSA.

**62.21 COMMENT:** Can "logical mine units" of tar sand be made by combining tar sand both in and adjacent to the WSA? If so, the small size of deposits in the WSA may be an invalid objection. [State of Utah]

**62.21 RESPONSE:** Available information indicates that the tar sand resource in the vicinity of the Devils Canyon WSA has a limited potential for development and would not be developed in the foreseeable future regardless of wilderness designation.

**62.22 COMMENT:** Our mining claims are the B and J Claim Group situated on both sides and adjoining the Moore Road and Interstate I-70, adjoining the proposed boundaries of the Sids Mountain and Devils Canyon WSAs, and the smaller but still significant JB Claim Group, situated near the intersection of the Moore Road and I-70, principally in Section 33 of Township 22 South, Range 9 East, BLM, and adjoining and overlapping the WSAs. From our investigations, it seems appropriate to have the westerly portions of both WSAs as wilderness areas. However, we strongly object to inclusion of the Moore Road corridor, including our claims, in the Sids Mountain WSA. The lands on the plateau adjoining the Moore Road near its intersection with I-70 were disturbed prior to our claim location by prior road building and ORV activities, and are not of wilderness character. Adjacent to the well-used Moore Road, there is no possibility for a "wilderness experience." We suggest instead, that the wilderness boundary (WSA boundary) be modified to begin at the cliff edge, within the aforesaid Section 33. This should be a trivial change from the government's standpoint, but of course is important to us as mineral claimant and lessees. There is a substantial body of pure gypsum in outcrop under our JB claims, which is affected by the present WSA boundary. The areas occupied by our B and J and JB Claim Groups constitute one of the world's great gypsum re-

sources. We contemplate that at some time in the relatively near future, the continuing demand for high grade gypsum in Utah and the intermountain west should result in the establishment of a large gypsum wallboard and plaster plant on our claims. There are, of course, many areas suitable for wilderness consideration within Utah, but few areas suitable for major mining operations. We believe that establishment of gypsum mining and processing operations on the properties would contribute significantly to the economic base and local economy of Emery County, which as you may know has been depressed for the last few years.

On page 17 of the EIS discussion of the Sids Mountain WSA, reference is made to the Carmel Formation and the occurrence of gypsum therein. For your information, our studies based on detailed geological mapping, drilling, and sampling, have indicated a total of about 540 million tons of high grade gypsum on our properties, including leases on two State sections, which gypsum however almost entirely occurs outside of and between the two WSAs. We believe that the presence of our very substantial gypsum resource outside the WSAs should not (except for the overlap of our JB claims with the WSA boundary) result in the need for any gypsum to be mined off of the WSA itself, as long as consideration of the two WSAs as wilderness areas does not in any way preclude mining and processing the gypsum from our areas adjoining the WSAs. Also for the record, with respect to our properties, we believe that the proximity of our deposit to the Moore Road and I-70 coupled with the continuing high levels of demand for gypsum product within Utah and the intermountain west augur well for significant, near term future development of the properties. [William Wray]

**62.22 RESPONSE:** There are no mining claims within the Devils Canyon WSA. Available information indicates that if gypsum deposits are located in the WSA, they would be small and would not be developed due to distance of mines to markets. The best known gypsum deposits are north and outside of the WSA.

**62.23 COMMENT:** In Emery County, UP&L is lessor under several oil and gas leases, from which it receives rent and royalties, near the following WSAs: 59 (San Rafael Reef), 62 (Devils Canyon), 63 (Sids Mountain), and 64 (Mexican Mountain). Gas production is occurring within 10 miles to the northwest of WSA 63. [Utah Power and Light]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

**62.23 RESPONSE:** Production from the Ferron gas field is noted in the Final EIS.

**62.24 COMMENT:** Special care should be taken to evaluate oil and gas potential in the San Rafael Reef, Mexican Mountain, Devils Canyon and Sids Mountain WSAs in the Geological Survey and Bureau of Mines report on the wilderness proposals to be submitted to the Secretary of Interior. UP&L and other persons commenting on the Draft EIS should have an opportunity to comment on this report, and they are prejudiced by not having it to comment on at the same time as the Draft EIS. The Final EIS should address impacts on these proposed wilderness areas from continued development outside, but very near their borders, and reevaluate their quantities for wilderness designation in light of this potential for development. [Utah Power and Light]

**62.24 RESPONSE:** See the response to Specific Comment 59.28. Oil and gas development is not projected for the Devils Canyon WSA in the foreseeable future.

**62.25 COMMENT:** The document indicates that golden eagles are a BLM sensitive species; however, it states that there are no known sensitive species present. This is contradictory. Also, desert bighorn sheep have been reintroduced into the WSA. [State of Utah]

**62.25 RESPONSE:** The Wildlife section has been revised for the Final EIS. No desert bighorn sheep have been introduced into the Devils Canyon WSA. However, bighorn sheep introductions have been made in the Muddy Creek WSA.

**62.26 COMMENT:** BLM erred in not recommending at least the 9,610-acre WSA as wilderness. Please consider the following points: (a) this area has high quality scenery with its steep canyon walls and narrows, and (b) this unique landscape should be protected through wilderness designation as proposed by the Utah Wilderness Coalition. [Sierra Club, Cache Group]

**62.26 RESPONSE:** Wilderness designation is not the only method available to BLM to protect landscapes and scenic values. For example, 6,535 acres within the Devils Canyon WSA are closed to surface disturbance because of oil and gas Category 3. Refer to Appendix 11 in Volume I for rationale for BLM's Proposed Action.

**62.27 COMMENT:** This area is important for reasons not fully known by BLM now. Required inventories of cultural resources, wildlife, threatened and endangered species, and recreation have not been completed. The SSA does identify two endangered or threatened species within the WSA benefitting from wilderness recommendation. Additional natural features and important resources are likely to be discovered when these inventories are completed. [Utah Wilderness Coalition]

**62.27 RESPONSE:** See the responses to General Comments 9.6, 13.1, 16.3, and 20.2.

**62.28 COMMENT:** BLM has exaggerated the ORV management problems in the Devils Canyon WSA. [Utah Wilderness Coalition]

a. BLM's ORV dilemma is more imaginary than real. With a few exceptions, ORVs cannot travel in this rugged area. The I-15 road closed routes from the north. Several major spillovers prevent vehicles from traveling in the canyon bottom. The rugged mountain and cliffs on the south and surrounding the canyons make travel impossible. BLM offers no evidence supporting their claim and all evidence conflicts with their conclusion. Their arguments exaggerate the real situation. The only area where ORVs currently operate in is the 100 acres at the eastern end of Devils Canyon. The first mile can be traversed by vehicles (not 2 miles as claimed by BLM). BLM claims that vehicle use "would be difficult to prevent." BLM has done nothing to discourage use. There are many methods which have been effectively used. The impacts are not enduring since the vehicles are using a sandy wash bottom. The noise conflicts with wildlife and quiet public land users but is not irreparable. BLM claims impacts on Justensen Flats impair wilderness values. To the best of our knowledge, these lie outside the WSA. If this is correct, mention of this is inappropriate when describing the character of the wilderness area. In describing potential problems and conflicts, there is no information on the amount of area affected, the relationship of these impacts to the rest of the area, or their specific location. BLM has not provided a map showing the location of conflicts. We request that one be provided.

b. Off-road vehicle (ORV) activity within most of Devils Canyon is prevented by the physical impossibility of placing a vehicle in the deep twisted slick rock canyons and rough bench lands. The topography that prevents ORV use is found by the foot traveler to be

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

filled with scenic values, wildlife (wild horses, for example), and ancient Indian archaeological sites.

c. ORV activities are cited by BLM as a management problem in a wilderness area. BLM has not made any effort in this area to control ORV activities. At this time, BLM has proven that problems may arise when ORVs are not managed. The topography acts in favor of protecting the area. Access to the wash into both Jutensen Flat and into the upper part of Devils Canyon passes through areas where physical barriers could be placed to control access. For ORVs to enter the eastern and eventually the southwestern part of the WSA, they must drive down a steep road cut in the side of a canyon wall. Placement of a single gate accessible to permittees and closed to the general public would end that problem. Justensen Flat also has a steep old road cut between two vertical walls of sandstone. These walls offer easy blockage of unnecessary vehicle access. BLM has not tried any of the possible management methods for ORV management and can make no objective assessment of the potential for success of these methods. In many other areas in similar terrain, these methods have been successful.

**62.28 RESPONSE:** Although ORV use is an issue for the Devils Canyon WSA, BLM's Proposed Action of No Action/No Wilderness Alternative is based on impact of outside sights and sounds from I-70. Refer to Appendix 11 in Volume I.

**62.29 COMMENT:** Title 24, Chapter 2 of the Utah Code requires me to be responsible for the suppression of uncontrolled fires on State-owned lands. The Draft Environmental Impact Statement allows for measures to control fire in a wilderness area when the fire threatens human life, property, or high-value resources on adjacent nonwilderness lands, or when the fire threatens to create unacceptable changes to the wilderness resource. Further, the statement assumes that fire fighting measures would be limited to aerial and hand methods. There are a total of 50 sections of State-owned land within the WSA in Emery County. This State in-held land creates a major conflict between my statutory duty to suppress uncontrolled fires on State-owned land and the limits placed upon me by wilderness designation to comply with that duty. I believe it is impractical to think that effective fire control could take place under those limitations and conditions. Adjacent to the study areas are 84 State owned sections of land. More than within the WSA, designation poses a greater conflict in regard to fire control to the adjacent areas. Effective fire

control requires the officer in charge to make quick decisions regarding time and manner of control operations. If I must determine whether or not a fire within the wilderness area poses a threat to human life, property, or high-value resource on the adjacent land, I will use valuable time. Time that may make the difference between success and tragic failure. Further, the means which I am restricted to use, hand and aerial, would be drastically ineffective in fighting a fire which threatens human life, property, or high-value resources. [LaMar Guymon]

**62.29 RESPONSE:** See the response to Specific Comment 59.36.

**62.30 COMMENT:** Emergency care also falls within my duties. By declaring the land a wilderness, BLM states that increased use will result. Increased use logically leads to an increase in accidents or emergencies. One would suppose that an increased risk of accidents or emergencies would require an increase in effectiveness in responding to the need. Under wilderness designation, however, it is clear that vehicular travel within the area is prohibited. It may be implied from the limitation to hand and aerial methods of fighting fires that there would be severe restrictions and limitations in the manner in which emergencies or accidents could be handled in the wilderness area. I view these conflicts as significant problems inadequately addressed by BLM in their Draft EIS. I am opposed to the designation as wilderness of these study areas because of the limitations and restrictions placed upon my department when dealing with emergency situations, directly in conflict with my statutory duties. [LaMar Guymon]

**62.30 RESPONSE:** See the response to Specific Comment 59.37.

**62.31 COMMENT:** BLM assessment of the impacts of sights and sounds is erroneous. [Sierra Club, Cache Group; Richard Campanella; and John Reeves]

a. The Draft EIS claims a major reason for non-wilderness designation is the presence of many ORVs in the Justenson Flats area of the WSA. These vehicles, according to the Draft EIS, begin to flow in at the beginning of spring. We visited the area on three beautiful early Spring days - the weekend of March 21-23. The skies were blue; the temperature was 70 degrees; and we did not see or hear one ORV, dirt bike, car, truck, or any other vehicle in the WSA and adjacent areas.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

b. On March 22 and 23 of this year, we visited the Devil's Canyon WSA. We explored the canyon from both the Justensen Flats and Kimball Wash areas. We were there on a warm, beautiful weekend and saw no ORVs in use either in the Justensen Flats or Kimball Draw areas, much less within the canyon itself. We did see several horsemen and some vehicular camping. ORV trails within the canyon were not significant and do not penetrate far into the canyon itself. The Draft EIS states that the Justensen Flats area is the most heavily impacted. It is but a small fraction of the total acreage of the WSA and relatively isolated from the canyon itself. The impact there is not severe and does not merit dropping the entire WSA from consideration. Drop the flats if you must, but keep the canyon.

c. In the Draft EIS, BLM claims that nearby I-70 generates noise levels that are too high and subsequently impact the wilderness. We sponsored two trips to this area, in February 1986 and March 1986, and found both times that this is simply not true. Once beyond the initial access area into the canyon area, our participating members never noticed that the interstate was close by. This should not be used as a criteria to remove Devils Canyon from potential wilderness designation.

d. Traffic noise from I-70 does not affect the wilderness qualities nearly as much as the Draft EIS implies. Only the heaviest 18-wheelers were audible at the canyon bottom and plateaus. At any rate, are "sights and sounds" allowed to determine wilderness?

e. As we penetrated deeper into the canyon we could, in a few isolated areas, see and hear vehicles on the Interstate. This does not intrude on one's senses and does not adversely affect the wilderness character nor the opportunities for solitude. The Draft EIS states on page 15 that the sounds from the Interstate are "constant," which they are not. It also states that "only part of the canyon . . . is free from the noise." My own experience in the canyon refutes this.

**62.31 RESPONSE:** Traffic and use conditions may vary from day to day or season to season. BLM has determined that ORV use and I-70 create sound intrusions that affect opportunities for solitude in the Devils Canyon WSA.

**62.32 COMMENT:** BLM has done a poor job in analyzing the present recreational use of the San Rafael

Swell area. I don't believe they have any data to back up the numbers that they are putting in the EIS. Because of that, I got myself and the club in a little bit of trouble over Easter by putting up some sign-in boards in several areas of the San Rafael Swell, to try to determine what some of the recreational usage levels were down there. My numbers indicate that there is at a least 5-to-1 ratio in favor of off-road vehicles. And I think BLM will have an extremely serious problem in trying to manage those areas if they are closed to off-road vehicles. [Dick Brass, Path Finders Motorcycle Club]

**62.32 RESPONSE:** See the response to Specific Comment 59.38. BLM estimates that annually about 550 visitor days of recreation use occurs in the WSA, of which approximately 400 are related to ORV use.

**62.33 COMMENT:** Outside sounds are an added value here more clearly contrasting progress (the freeway) with wilderness. Here in Devils Canyon, the presence of the freeway doesn't mandate a band of nonwilderness within the sounds of the freeway. Sierra Club outings in this canyon have indicated that at no place in the canyon can sight of the freeway, above the canyon to the north, be seen. These sounds are more limited than BLM suggests. In the east, the freeway rises up onto the reef from Justensen Flats through a rock cut. Noise from the freeway cannot be heard at all for the first 2 miles into the area in the east. Only the heaviest of trucks can be heard and then only for approximately 2 miles of the canyon bottom. The reason is that the topography reflects sound away from the WSA, not into the area. BLM is inconsistent in applying the outside sights and sounds argument. Just to the north abutting the freeway, Sids Mountain is found not to be impacted by outside sights and sounds. Even when significant, outside sights and sounds were found by Congress not justifiable grounds to drop areas from wilderness recommendations. Use of this argument would violate the intent of Congress. [Utah Wilderness Coalition]

**62.33 RESPONSE:** The size and configuration of Sid's Mountain and Devils Canyon are different. Sids Mountain is much larger and the affects of I-70 are much less in the area as a whole.

**62.34 COMMENT:** Unfortunately, extensive ORV destruction is also present in the WSAs in the San Rafael. I recently spent several days hiking in these areas and I am appalled at the damage BLM has

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

permitted in areas the law requires to be managed in such manner as to maintain their wilderness characteristics. [Jack Spence]

**62.34 RESPONSE:** See the response to Specific Comment 59.34.

**62.35 COMMENT:** In a recent trip into Devils Canyon, the sound of I-70 traffic could not be detected any place in the canyon drainage, which is the heart of the WSA. Visitors seeking solitude can find it abundantly if they avoid the times when ORV use in the WSA is absent. If BLM would exclude ORVs, solitude would never be a problem. BLM also states that there is a lack of primitive recreation in much of the area. This is pure nonsense. The area abounds in primitive hiking, exploring of side canyons, rock climbing possibilities, and many other possible uses. Attempting to climb out of one of the numerous deep side canyons is an experience that most hikers would find primitive indeed. The canyon has superlative scenery, with a considerable variety of vegetation (including Douglas fir and spruce) and wildlife. It is a prime example of this type of geological formation, complementing Sids Mountain on the north side of I-70. There are no good reasons for excluding it and many excellent reasons for including it in the wilderness system. [Jack Spence]

**62.35 RESPONSE:** See the responses to General Comments 8.11 and 22.5.

**62.36 COMMENT:** BLM claims that Devils Canyon lacks opportunities for primitive recreation. We strongly disagree with this statement. The Devils Canyon area has numerous outstanding opportunities for hiking, camping, backpacking, photography, and similar activities. BLM should reevaluate their analysis of primitive recreation in this area. [Sierra Club, Cache Group]

**62.36 RESPONSE:** See the response to General Comment 8.11.

**62.37 COMMENT:** From the discussion of solitude, it sounds as if there is minimal opportunity for solitude. Yet in the concluding paragraph of the section, it states that 73 percent of the WSA meets the outstanding criteria for solitude. This seems inconsistent. [State of Utah]

**62.37 RESPONSE:** Approximately 73 percent of the WSA meets the criterion for outstanding opportu-

nities for solitude. The small size and narrow shape of the WSA make it difficult for the visitor to avoid the influence of the highway.

**62.38 COMMENT:** In Devils Canyon, it appears that BLM has failed to control ORV abuse in a few locations. BLM should use this as an example to completely review its policies on ORV management and the intent of Congress under FLPMA for ORV control. We feel that BLM is not fulfilling its proper and legally required role in managing WSAs as wilderness until Congress decides otherwise. [Sierra Club, Cache Group]

**62.38 RESPONSE:** See the response to General Comment 5.4.

**62.39 COMMENT:** In a paper entitled "Discussion of an Option to Proposed Wilderness Designation on the San Rafael Swell" by the Emery County Economic Development Council the following statements are made: "We are taking the stand that some wilderness designation in Emery County is in the long term best interest of the county." "With few exceptions, we concur with the findings as they were published in the site specific analysis for each of these areas in March of 1983. We come to an even more complete concurrence with the recommended findings of the BLM, which proposes setting aside 366,345 acres in eight of the nine proposed Wilderness Study Areas." "Due to the geographic nature of the land that has been designated as wilderness, it has to be considered as wilderness. Accordingly, we would be acting irresponsibly if we were to discourage or oppose some wilderness designation in Emery County." "But we see in wilderness designation, some status that would encourage visitation of a broader audience than we are now receiving." "There is a certain portion of our County that is deserving preservation and protection." It is very disappointing to have local officials say one thing then do completely otherwise. To take a position that there will be no wilderness on the San Rafael does nothing towards resolving the wilderness issue on San Rafael. [Utah Wilderness Association]

**62.39 RESPONSE:** See the response to Specific Comment 59.45.

**62.40 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to: (1) protect the tax base; (2) foster agriculture and industry, including mineral reduction and processing plants, together

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

with uses; and (3) stabilize and improve property values.

We do not feel that the BLM Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine wilderness study areas as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possibly affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986, to become a matter of record. Quoting from Section C of this plan, I conclude: "C. Open Space - In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County and accordingly, the county has adapted a zoning resolution in accordance with the earlier mentioned comprehensive plan and its accompanying statement of intent.

Further, Emery County positions itself: (1) to support the highest, economically allowable development of known mineral and energy resources throughout the county; (2) to utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable; (3) to maintain at least present levels of AUMs on public lands; and (4) to preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands.

Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statutes. [Emery County]

**62.40 RESPONSE:** See the response to Specific Comment 59.43.

**62.41 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that even though it acknowledges the presence of the Emery County Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accord-

ingly, and in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**62.41 RESPONSE:** See the response to Specific Comment 59.44.

**62.42 COMMENT:** Page 23, Land Use Plans and Controls: The statement is made that, "Wilderness designation would not conflict with the Emery County Zoning Plan because this use would continue . . ." What use is that? [State of Utah]

**62.42 RESPONSE:** The Emery County Zoning Plan of 1984 shows the area as M and G-1 (mining and grazing). Wilderness designation or nondesignation is not specifically addressed in the county zoning plan.

**62.43 COMMENT:** Because of UP&L's responsibility to provide electricity for future growth and development in Utah, the proximity of five WSAs in the BLM Proposed Action Alternative to its future steam electric generating stations is of serious concern. No future plants are located in WSAs. Should UP&L's next steam electric plant be one of those listed below, a full EIS would be required as part of the planning process. UP&L is concerned, however, that it would be precluded from building to meet future generation needs in the most efficient and economical manner because of wilderness designation between now and the time the plant is needed. Future steam electric generating plants may be jeopardized if additional air quality restrictions are placed on future wilderness areas. The plant sites and distances from the nearest WSAs are listed below: [Utah Power and Light]

<u>Plant Site</u>	<u>Distance/Direction</u>	<u>Nearest WSA</u>
Mounds	10 miles/east	67
East Canyon	12 miles/southeast	67
Wellington	25 miles/southeast	67
Gordon Creek	32 miles/southeast	67
Woodside	4 miles/southeast	66
Green River	10 miles/southeast	62
Westwater	5 miles/southeast	72

**62.43 RESPONSE:** See the responses to General Comments 10.1, 10.3, 10.4, and 10.5. Air quality standards are not proposed to be changed from the present PSD Class II. Air quality restrictions would not be tightened unless the State of Utah decided to designate the areas PSD Class I, which is believed to be unlikely. Therefore, it is anticipated that if power plants are designed to meet existing Class II

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 62: DEVILS CANYON WSA (CONTINUED)**

standards, they could be permitted under air quality regulations regardless of wilderness designation.

**62.44 COMMENT:** In Volume I, Chapter 4, it is indicated that "Utah's mining industry now accounts for less than 3 percent of the State's total employment." In Emery County, over 50 percent of the local work force is either in mining or a utility-related position. The Draft EIS indicates that Emery County is one of six counties that could have "the greatest potential for significant impacts resulting from designation," yet the BLM Proposed Action does not appear to take this into consideration. We ask that BLM carefully weigh their recommendations and decisions as they complete their Final EIS. [Emery County]

**62.44 RESPONSE:** See the response to Specific Comment 59.47.

**62.45 COMMENT:** Page 23 and 24: These pages are out of order and should be reversed. [State of Utah]

**62.45 RESPONSE:** The correction has been made.

**62.46 COMMENT:** The genesis of tar sand involves biodegradation in addition to the simple loss of volatiles discussed in the Draft EIS. [State of Utah]

**62.46 RESPONSE:** This information has been added to the text of the Final EIS.

**62.47 COMMENT:** The Devil's Canyon WSA has both low wilderness quality and conflicts compared with the other WSAs in the San Rafael Swell region. The major concern is with extensive OHV use. Moderate conflicts exist with potential gypsum resource developments. [State of Utah]

**62.47 RESPONSE:** The quality of wilderness values in the Devil's Canyon WSA is discussed in the Final EIS. The impacts of wilderness designation and nondesignation on wilderness values, as well as on OHV activities, are analyzed. More accessible deposits of gypsum occur outside the WSA, and it is projected that development of the gypsum resource in the WSA would not occur in the foreseeable future with or without wilderness designation. Therefore, impacts on the gypsum resource are not analyzed in detail in the Final EIS.

**SECTION 63**  
**SIDS MOUNTAIN/SIDS CABIN WSA**

**63.1 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in the Sids Cabin WSA in that it did not adequately follow required procedures for the acquisition and subsequent WSA designation of the Sids Cabin WSA by holding public hearings and allowing for public comment. (See 1970 report from Public Land Law Review Commission, "One Third of the Nation's Land.") According to the BLM Organic Act, the Secretary's land use plans "shall be consistent with the State and local plans to the extent he finds consistent with Federal law and the purposes of the Act."

The district court case of the City of Rochester vs. U.S. Postal Service 541 F. 2nd 908 (976) suggests that Federal agencies risk having their actions stricken for procedural defects where there was a failure to comply with requirements for intergovernmental coordination.

The court held that 42 U.S.C. 4231 (The Intergovernmental Cooperation Act) which requires a Federal agency to "give full consideration to all viewpoints, national, regional, State, and local," in planning Federal development of projects. The agency has an "affirmative duty to develop a reviewable record," including a list of factors which support its decision to act in "disharmony with local planning objectives," so that a reviewing court can determine whether "the agency has acted arbitrarily or capriciously" in finding that it has fully considered but rejected local planning objectives. [Emery County]

**63.1 RESPONSE:** The Draft EIS did not contain a recommendation for the Sids Cabin WSA. Rather, it contained an addendum explaining that BLM had recently obtained ownership of a 440-acre parcel of land which was completely surrounded by the Sids Mountain WSA. This 440-acre parcels was formally designated as the Sids Cabin WSA by Federal Register notice on January 21, 1986. Both WSAs are combined for the Final EIS as the Sids Mountain/Sids Cabin WSA. The addendum to the Draft EIS and the Federal Register notice sought public comment regarding the Sids Cabin WSA.

**63.2 COMMENT:** A public hearing was held on November 13, 1985, "for the purpose of gathering public input on the wilderness designation of the San

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 63: SIDS MOUNTAIN/SIDS CABIN WSA (CONTINUED)**

Rafael Swell area and possible alternatives to wilderness designation." At this time I would like to submit the transcript of that hearing for the public record. At that public hearing a straw poll was conducted to determine which land use actions the public wished to pursue. Participants were asked to rank seven different options according to their personal preference. Each ranking was given a point value, with the first choice given seven points, and the last choice only one point. The results were as follows: The number one choice, with 584 points, was to "put all efforts into opposing wilderness designation on the Swell." The option of supporting wilderness designation on the Swell placed sixth, with 140 points. The least preferred alternative was to support a national park designation on the Swell. In order to represent the public interest as elected officials, the Emery County Commission issued a formal statement in which it was stated, "The Commission has concluded that it cannot support any designation upon the San Rafael Swell by any agency that would result in restrictive and exclusionary management practices beyond those practices currently employed by the Bureau of Land Management." In other words, we cannot support anything other than multiple use management of the Swell.

As public officials, we are obligated to represent the majority will of our county citizens. We feel we have done so in taking the position we have taken. [Emery County]

**63.2 RESPONSE:** See the response to Specific Comment 59.1.

**63.3 COMMENT:** BLM's inventory decisions are erroneous. [Utah Wilderness Coalition]

a. BLM's WSA boundary deleted natural lands which should qualify for study and potential designation. The upper part of Cane Wash is completely natural and highly scenic. The prominence called the "Pinnacle" east of Cane Wash is also of scenic value and without impacts. The current inventory boundary is about 3 miles west of the impacts found in Well Draw and Oil Well Flat. BLM incorrectly did not put the boundary of this unit along the edge of human impacts. In the upper part of Mesquite Draw, BLM chooses to have a boundary which cuts across the mile of natural land without any clear reason to a person on the ground. In this area BLM moved the boundary from the last impact about 2 miles in, cutting off a corner

of the unit. If the inventory process had been followed, this would be in the WSA.

b. BLM recommends nonwilderness for significant wildlands around the edge of the WSA, claiming that human intrusions are substantially noticeable. But the most serious issue involves BLM's proposal to leave off-road vehicle corridors deep into the heart of the WSA. The Draft EIS recommends a boundary that largely follows topographic lines often far from significant human intrusions. For example, the upper part of Cane Wash, while meeting the criterion for naturalness, is deleted from the study area. The Head of Sinbad has some intrusions but overall the area is still natural. The rugged washes west of Wedge have no human impacts. The wilderness inventory excluded many areas using rationale violating the inventory policy. BLM should extend the study area boundary to include all special values and enhance manageability of the area.

**63.3 RESPONSE:** See the responses to General Comments 3.1 and 3.43.

**63.4 COMMENT:** BLM should not propose the Partial Wilderness Alternative that leaves ORV corridors. [Utah Mountain Club, Scott DeLong, and Jack Spence]

a. We must take issue with your recommendation of partial wilderness. The nonwilderness corridors that you have proposed will unavoidably detract from the wilderness character of the area in future years, and compromise the enjoyment of nonmotorized recreation in these lovely canyons. It may be true now that there is little impact from ORVs, but, if your projections are correct for increased visitation of all types, there is sure to be a problem eventually. At stake is the quality and integrity of primitive, nonmotorized recreation in the entire wilderness area. Your proposal to allow ORV corridors which deeply incise and even cleave the proposed wilderness is very irregular and unlike any wilderness proposal that we have ever seen. We feel that incising the wilderness, even cutting it in half at one point, as a concession to ORV use invites management problems. If the area is to be considered an "Outstanding Natural Area and Area of Critical Environmental Concern," those interests are best served by eliminating ORV use altogether. In addition to the conflicts with solitude, increased motorized access would likely have measurable negative impacts upon sensitive wildlife,

such as bighorn sheep, for which Sids Mountain is "crucial" year-round habitat. We urge you not to slice up the WSA!

b. The designation of the canyons within Sids Mountain as ORV routes is tantamount to rejection of the area as wilderness. These canyons, with their vegetation (including Douglas firs and spruce), depth, intermittent water, and solitude, are the heart of the WSA. Without their inclusion, few will use the WSA for the intended purpose of solitude and primitive recreation because of the likelihood of encountering dirt bikes or ATVs in the canyons. If these corridors are retained, the total WSA might as well be eliminated, which may be the BLM's real preference. The majority of the soils outside of the wash bottoms are cryptogamic, composed of microorganisms which reduce soil and wind erosion, store precious water, and harbor nitrogen fixing blue-green algae which provide nutrients for plant growth. A single passage of an ORV destroys the cryptograms, preventing plant growth for a long period. Even using the narrowest interpretation of BLM's mission as protection of rangeland, allowing ORVs to destroy the soil is totally irresponsible. The partial wilderness designation will undoubtedly result in loss of wilderness values for the majority of this magnificent area, serious soil erosion, plant destruction, noise, and loss of important wildlife habitat.

c. Sids Mountain is a very large roadless area that meets all of the criteria for wilderness; it has superb recreational opportunities, is highly scenic, and has unlimited opportunities for solitude. This area has received greater and greater numbers of recreationists with each passing year. The Draft EIS acknowledges all this. So why delete a tiny 2,100 acres from this beautiful area? Is it because of human imprints? No! Is it because of oil, gas, mining, or grazing conflicts? No! The Draft EIS states that these conflicts are minimal and unimportant. The 2,100 acres will be deleted to provide vehicular ways for ORVs!!! You stated in an interview (re: Earth First! wilderness proposals) that the purpose of the BLM wilderness study process was to identify bona fide wilderness areas not to tear up existing roads and structures to create wilderness. Certainly you are not now interpreting the Congressional mandate to mean that you must find appropriate roads to be built through bona fide wilderness?! That is exactly what you are proposing to do here. Surely there are enough areas in the remaining 85 percent of the State for ORV fanciers. If you had lopped off a 2,100-acre corner somewhere I probably would not be so concerned with this proposal. Instead you have recommended that this WSA be honeycombed with ORV roads throughout many of the canyon bottoms. Opening this area to ORV

use will severely undermine the wilderness character of the surrounding wilderness, will be detrimental to wildlife in the area (especially bighorn sheep), will greatly increase the conflicts between motorized and primitive recreation users, and will virtually ensure management problems for the entire area. What has possessed you to come up with this terrible plan?

**63.4 RESPONSE:** BLM has revised the Partial Wilderness Alternative to include Saddle Horse Canyon and an area between Cane Wash and North Fork of Coal Wash, thus preventing through traffic. About 806 acres, mainly in the drainage areas and wash bottoms of the north and south forks of Coal Wash, Upper Eagle Canyon, and Buckhorn Draw, are not proposed as wilderness. Although the North Fork of Coal Wash exclusion would divide the area into two sections, both are sufficiently large to maintain wilderness values. Blocking the road in two places on either side of Saddle Horse Canyon would avoid bisecting the area and prevent vehicle traffic in the canyon. ORV use can be contained in the wash bottoms where evidence of such use would be removed by seasonal runoff.

**63.5 COMMENT:** The San Rafael Swell should be held under wilderness study protection until national park status can be carefully analyzed. [Wendall Anderson and John Lockhart]

a. I have some knowledge of the San Rafael area and am of the opinion that it merits national park status. It should be held under wilderness study protection until national park status can be carefully analyzed. The area should include all of the Sids Mountain and Mexican Mountain WSAs and additional wildlands, and the more developed land around the Wedge, Buckhorn Draw, and along the San Rafael River. This could either be a new park or an addition to the Canyonlands and Capital Reef National Parks.

b. The San Rafael Reef and Swell should be a national park. Until it becomes so, it should be protected by wilderness status. The small isolated areas proposed by BLM won't do it. It needs large areas to protect the integrity of this special place. To sacrifice this whole area so a few dirt bikers can have fun doesn't make sense. The All Wilderness Alternative must be adopted in all the WSAs around the San Rafael Reef and Swell.

**63.5 RESPONSE:** See the response to General Comment 3.30.

**63.6 COMMENT:** Unlike its recommendations for other WSAs containing State lands, BLM claims that some of the State sections within this WSA would



present management problems if designated wilderness. But the State of Utah is open to exchange of all State lands within BLM wilderness areas. During the exchange process, BLM can manage access across wilderness lands to in-holdings. The Cotter Corporation decision clearly granted BLM legal authority to control the manner of access to protect wilderness values. [Utah Wilderness Coalition]

**63.6 RESPONSE:** The revised policy of the Utah Board of State Lands and Forestry is to reserve its position regarding exchange of in-held State lands within any particular WSA. Because of this change of position, BLM has assumed that in-held State lands would remain under existing ownership for the Final EIS.

**63.7 COMMENT:** It should be pointed out that three or four generations of Utah residents, as well as citizens from other states, used and enjoyed the WSA as wilderness long before the noisy off-road vehicle crowd even heard about the area. Now the ORV user's late claim to the area would destroy its historic use as wilderness for all others. The ORV user's claim to the area is therefore inappropriate for this reason alone and should be rejected. [American Wilderness Alliance]

**63.7 RESPONSE:** See the response to Specific Comment 63.4.

**63.8 COMMENT:** The diversity of Sids Mountain, ranging from the unique biological communities to the opportunities for primitive recreation, clearly outweigh the ORV use requirements. There are other sufficient locations near Sids Mountain for ORV use. The analysis makes this very clear: "the opportunity (for ORV activities) would not be much different from many already found in other parts of the San Rafael Swell." [Sierra Club, Cache Group]

**63.8 RESPONSE:** See the response to Specific Comment 63.4.

**63.9 COMMENT:** I urge you to adopt the "All Wilderness Alternative" for these WSAs. Since you have excluded the small area near I-70 because of vehicle sounds, surely you must realize that allowing RVs into the center of these tracts would be totally inappropriate. [Martin Barth]

**63.9 RESPONSE:** See the response to Specific Comment 63.4.

**63.10 COMMENT:** BLM complains throughout the Draft EIS that it cannot manage an area as wilderness if it is too small. Why then does BLM want to split up

a large WSA with natural borders into a small WSA with man made roads? BLM's proposal will invite more management problems. The proposed ORV corridors will interfere with opportunities for primitive, nonmotorized outdoor recreation throughout the Sids Mountain complex. Popular hiking routes will be highly impacted. In this WSA, BLM estimates that use could grow to 16,000 visitor days if Sids Mountain becomes a wilderness area, and it is already one of Utah's most popular BLM primitive recreation areas. The Draft EIS also does not adequately consider possible ORV abuse potential along and adjacent to the proposed corridors. In addition, the proposed ORV corridors will increase potential conflict with popular nonmotorized primitive activities in this area. Archaeological sites will be especially threatened under BLM's proposal. [Rudy Lukez]

**63.10 RESPONSE:** See the response to Specific Comment 63.4.

**63.11 COMMENT:** We believe that there will be a direct negative effect on future mining opportunities at the Emery Mine (especially expanded production through surface mining) by these wilderness designations. BLM efforts to protect proposed high quality Class A scenery (e.g., Sids Mountain) or to protect visibility at the proposed VRM Class I areas will ultimately include attempts by the Federal Government to reduce fugitive dust emissions in Castle Valley and surrounding areas through the coal mining and air quality permitting processes. Requirements for fugitive dust controls above those currently practiced by the Utah coal industry will lead to additional production costs and constraints which would weaken the competitiveness of our Emery County reserves. [Consolidated Coal Company]

**63.11 RESPONSE:** See the response to Specific Comment 59.8.

**63.12 COMMENT:** WSA 63 (Sids Mountain) is only 10 miles from the Hunter plant, UP&L's largest generating facility. Three WSAs are within 25 miles of the Hunter plant. Air quality and designation of integral vistas are issues of substantial concern to UP&L. Generally, wilderness areas have a Class II PSD classification. UP&L's generating facilities are permitted by the EPA and fully comply with existing air quality classifications. The Draft EIS states that BLM will not seek to upgrade PSD classification in the final wilderness areas to Class I, and we would vigorously oppose such a request from any person or agency at any point in the wilderness study or designation process, or thereafter, because of the millions of dollars of increased environmental compliance cost which would have to be borne by its ratepayers to comply with

Class I PSD air standards. While integral vistas generally have been designated as extensions of national parks, there is no assurance that at some future date they will not be asserted for wilderness areas just as Federal reserved water rights have been in Colorado. UP&L's existing steam electric generating plants are located in close proximity to several WSAs, as are its future plant sites and mining leases. [Utah Power and Light]

**63.12 RESPONSE:** See the responses to General Comments 10.3 and 10.5.

**63.13 COMMENT:** BLM did not complete an adequate analysis of the petrified wood found in Cane Wash. [Sierra Club, Cache Group]

**63.13 RESPONSE:** Most of the Cane Wash petrified wood area is outside the WSA. In addition, available information suggests that it is not unique to the area.

**63.14 COMMENT:** The "Eocene Age" would be more precisely termed "Eocene Epoch," the age (millions of years ago) of this movement might be worth including. [State of Utah]

**63.14 RESPONSE:** The term "Eocene Epoch" was used in the Final EIS for the Sids Mountain/Sids Cabin WSA. Citing the number of years would not add significantly to the usefulness of the narrative.

**63.15 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**63.15 RESPONSE:** See the response to Specific Comment 59.14.

**63.16 COMMENT:** The presence of eight endangered, threatened, and candidate plant species requires complete wilderness protection for the complete Sids Mountain area without the three corridors. [Sierra Club, Cache Group]

**63.16 RESPONSE:** See the responses to General Comments 13.1, 13.4, and 13.5 and Specific Comment 59.15.

**63.17 COMMENT:** The BLM did not perform an adequate analysis of threatened and candidate plants species in the Sids Mountain analysis. These plants include: [Sierra Club, Cache Group]

- (1) Hymenoxys depressa (no common name)
- (2) Pediocactus despainii (San Rafael cactus)
- (3) Gaillardia flava (Yellow blanket flower)

- (4) Erigeron maguirei (Maguire daisy)
- (5) Sclerocactus wrightiae (Wright's fish hook)

**63.17 RESPONSE:** See the responses to General Comments 13.1, 13.4, and 13.6.

**63.18 COMMENT:** Along with habitat and plant conservation, we must identify and mitigate the threats facing the species involved. BLM has a stated policy of protection for sensitive, threatened, and endangered plants that have gained recognition in the Federal Register. Unfortunately, however, the agency in Utah has a lack-luster record of effective management of even listed endangered plants. The Dwarf Bear Poppy (Arctomecon humilis) is a case in point. While this species does not occur in or even near any WSAs, the agency has failed to effectively prevent deterioration of populations. This situation prevails despite the fact that the plant was listed nearly seven (7) years ago. Similarly, the candidate species Pediocactus despainii, (listing package in preparation by FWS) of the San Rafael Swell faces increasing jeopardy because of BLM ignorance or inaction. Known to occur in at least two WSAs, Crack Canyon and Sids Mountain, the San Rafael pincushion cactus may also be found in the Mexican Mountain WSA. This diminutive cactus faces increasing numbers and frequency of ORV use in its habitat. BLM even sponsors an annual ORV event that sees hundreds of ORVs run with loose supervision near the Crack Canyon WSA and adjacent to critical habitat for this beautiful little cactus. Since the agency has sponsored the motorcycle event each spring, increasing numbers of ORV tracks have been observed criss-crossing the terrain where these rare endemics are found. The disregard for the species and the habitat vital to its survival is of great concern. This case represents only one circumstance, but we fear that it depicts the approach and policy that BLM intends to use in addressing their land management trust. [Marvin Poulson]

**63.18 RESPONSE:** See the responses to General Comments 13.1, 13.5, and 13.6 and Specific Comment 59.15.

**63.19 COMMENT:** A large number of threatened and endangered plant species have been identified within the WSA. The Draft EIS should identify the amount of the WSA that has been surveyed and estimate the number of species and the area covered by these species. [Utah Wilderness Coalition]

**63.19 RESPONSE:** See the response to General Comment 13.1. An inventory contract is currently underway to identify and map the locations of threatened, endangered, and sensitive plant species in the

San Rafael Swell. The results will be available in 1990.

**63.20 COMMENT:** BLM's statement in Volume I (a rationalization for not selecting Vegetation as an Issue) refers to threatened and endangered species by stating, "Because necessary measures would be taken to protect these species, it can be concluded that the viability of populations of threatened, endangered, or sensitive plant species would be preserved with any of the alternatives." This statement is flawed. The Mexican Mountain SSA clearly indicates on page 40 (Vol. VI):

"additional access would become established in the 12,850 acres of the WSA not designated. This could increase the threat to Sclerocactus wrightiae. The area not designated includes the one known site for this species. Also, in the undesignated area, ORV use could eventually become established into the habitat area for Erigeron maguirei due to its proximity to Buckhorn Draw."

Anything but the All Wilderness Alternative could result in the loss of these species because the area is open to ORVs. Similar situations exist in other WSAs (Moquith Mountain and other San Rafael WSAs) with respect to threatened and endangered plant species. It cannot be automatically concluded these species will survive without wilderness designation especially given the reluctance to close areas to ORVs and the fact the Section 7 consultation and mitigation will only be done on proposed projects which would cause surface disturbance such as mineral activity. Realistically speaking, there is no protection for these species in areas open to ORVs. [Utah Wilderness Association]

**63.20 RESPONSE:** See the response to Specific Comment 59.15.

**63.21 COMMENT:** Although BLM did recognize rare and sensitive plant species in the Draft EIS, the analysis was incomplete. The failure to identify vegetation as a major Statewide issue, particularly when three major issues deal with livestock grazing, shows a bias against natural values and an inconsistency in the selection of issues. [Utah Wilderness Association]

**63.21 RESPONSE:** See the response to General Comment 13.1. Impacts on vegetation including special status species is analyzed as an issue for the Sids Mountain/Sids Cabin WSA in the Final EIS.

**63.22 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. Accord-

ingly, I submit to you with this statement a copy of our resolution numbered 4-17-86 concerning Federal reserve water rights. [Emery County]

**63.22 RESPONSE:** The resolution is contained in the Final EIS in Volume VII, Part A.

**63.23 COMMENT:** The EIS should point out that wilderness designation in the San Rafael Swell would lead to stricter air and water quality standards that would interfere with industry. [Emery County and Consolidated Coal Company]

a. The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions. Future mineral production could be hindered by regulation of water running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation.

b. In enhancing water quality of streams flowing through wilderness management areas, efforts to improve water quality will likely be directed at upstream point source discharges, which will include coal mine discharges. More stringent effluent limitations applied to coal mines through the NPDES permitting process would likely increase production costs and possibly preclude future mine expansions.

**63.23 RESPONSE:** See the response to Specific Comment 59.21. Approximately 18 miles of the San Rafael River flow through the WSA. The EIS recognizes the potential for future conflict of wilderness designation and consumptive use of water upstream of the WSA. See the response to Specific Comment 60.13.

**63.24 COMMENT:** The impact of wilderness designation on the salinity of the San Rafael River should be analyzed. [Emery County]

a. Being that the San Rafael and the tributaries to the San Rafael are major contributors to the Colorado River salinity problem, we are concerned with what measures might be taken if downstream areas are designated wilderness.

b. The Draft EIS is remiss in that it does not take into consideration the water salinity problem on the San Rafael, Muddy, and Price Rivers, and it further does not indicate how this problem will be dealt with

if wilderness is designated on these streams. Because these bodies of water and tributaries to these bodies are major contributors to the Colorado River salinity problem and because the Bureau of Reclamation has been given the charge of solving the salinity problem and because the Sierra Club vs. Block decision regarding a Federal reserve water right may have a major impact on what can be done, it is felt that there should be no wilderness recommendation made nor should there be any wilderness designated until these issues are addressed and resolved favorably to Emery County.

**63.24 RESPONSE:** Additional information on salinity is provided in the Final EIS.

**63.25 COMMENT:** Our Emery reserve is located on upstream watersheds of streams which flow through the proposed wilderness areas. A wilderness designation would impart to the Federal Government a reserved right to all unappropriated waters which flow through the wilderness area. This water right is considered superior to the rights of all future appropriators. Such a restriction could mean that water would be unavailable for future mining needs including coal cleaning, dust suppression, drinking water, and irrigation during reclamation, and thus eliminate the possibility of future mine expansions. [Consolidated Coal Company]

**63.25 RESPONSE:** See the response to Specific Comment 60.15.

**63.26 COMMENT:** We anticipate that future Federal coal leasing decisions, which are essential for a stable coal mining industry in Utah, will be negatively influenced by BLM's responsibilities to maintain and improve air and water quality in designated wilderness areas. This conflict will increase pressures on BLM to delete certain coal tracts from the competitive leasing process if it is perceived that development may have negative impacts on wilderness values. Future coal production throughout Utah will be reduced by this process. [Consolidated Coal Company]

**63.26 RESPONSE:** See the responses to Specific Comment 59.21 and General Comment 7.1. BLM does not expect to manage adjacent areas to provide buffer zones around designated wilderness areas.

**63.27 COMMENT:** UP&L has pending and perfected water rights in the San Rafael River basin amounting to 150,000 acre-feet and 141.184 CFS for power, stockwatering, and irrigation use. UP&L has purchased all irrigated land along the San Rafael River and believes that the San Rafael River is totally appropriated during average or below average water years,

when potential conflicts with wilderness areas over water would occur. In addition, UP&L has purchased and developed water rights on tributaries to the San Rafael River for use in its existing steam electric plants in Emery County. Continued use of those water rights is essential to UP&L's generation of electricity in its large Emery County plants. [Utah Power and Light]

**63.27 RESPONSE:** Additional information on water rights and water use has been included in the Final EIS.

**63.28 COMMENT:** Emery County has vast natural resources in the San Rafael Swell. There are millions of barrels of oil in the tar sand within the WSA. The San Rafael tar sand deposit (parts of T. 23, 24 S., R. 9, 10, and 11 E.) contains measured reserves of 300 million barrels of oil in place in 25,600 acres plus another 250 million barrels of speculative reserves in another 25,600 acres (Major Tar Sand And Heavy Oil Deposits in the U.S., Interstate Oil Compact Comm. 1984, p.255). This large tar sand reserve is in jeopardy of never being developed if any of the surrounding WSAs are designated as wilderness. The reason for this is the possibility of development impacts on visual vistas in areas that can be seen from the wilderness lands. If these visual vistas are ever used - then forget any tar sand development at any time in the future. [Southeastern Utah Association of Local Governments]

**63.28 RESPONSE:** See the response to Specific Comment 59.23. Approximately 2500 acres of the WSA are in the San Rafael Swell tar sand area. The EIS recognizes the presence of tar sand in the WSA, however, it is unlikely that tar sand development will occur in the foreseeable future, regardless of wilderness designations.

**63.29 COMMENT:** The tar sand is probably in the Black Dragon Member of the Moenkopi Formation rather than the Torrey Member. [State of Utah]

**63.29 RESPONSE:** Tar sand deposits are in the Black Dragon Member of the Moenkopi Formation. This has been clarified for the Final EIS.

**63.30 COMMENT:** There is a high potential for discovery of uranium deposits using proper exploration techniques. [State of Utah]

**63.30 RESPONSE:** The EIS notes that there is a high potential for uranium/vanadium deposits of 500 to 1,000 metric tons to occur within the WSA.

**63.31 COMMENT:** Our mining claims are the B and J Claim Group situated on both sides and adjoining the Moore Road and Interstate I-70, adjoining the proposed boundaries of the Sids Mountain and Devils Canyon WSAs, and the smaller but still significant JB Claim Group, situated near the intersection of the Moore Road and I-70, principally in T. 22 S., R. 9 E., sec. 33, BLM, and adjoining and overlapping the WSAs. From our investigations, it seems appropriate to have the westerly portions of both WSAs as wilderness areas. However, we strongly object to inclusion of the Moore Road corridor, including our claims, in the Sids Mountain WSA. The lands on the plateau adjoining the Moore Road near its intersection with I-70 were disturbed prior to our claim location by prior road building and ORV activities, and are not of wilderness character. Adjacent to the well-used Moore Road, there is no possibility for a "wilderness experience." We suggest instead, that the wilderness boundary (WSA boundary) be modified to begin at the cliff edge, within the aforesaid Section 33. This should be a trivial change from the government's standpoint, but of course is important to us as mineral claimant and lessees. There is a substantial body of pure gypsum in outcrop under our JB claims, which is affected by the present WSA boundary. The areas occupied by our B and J and JB Claim Groups constitute one of the world's great gypsum resources. We contemplate that at some time in the relatively near future, the continuing demand for high grade gypsum in Utah and the intermountain west should result in the establishment of a large gypsum wallboard and plaster plant on our claims. There are, of course, many areas suitable for wilderness consideration within Utah, but few areas suitable for major mining operations. We believe that establishment of gypsum mining and processing operations on the properties would contribute significantly to the economic base and local economy of Emery County, which as you may know has been depressed for the last few years. [William Wray]

in the EIS discussion of the Sids Mountain WSA, reference is made to the Carmel Formation and the occurrence of gypsum therein. For your information, our studies based on detailed geological mapping, drilling, and sampling, have indicated a total of about 540 million tons of high grade gypsum on our properties, including leases on two State sections, which gypsum however almost entirely occurs outside of and between the two WSAs. We believe that the presence of our very substantial gypsum resource outside the WSAs should not (except for the overlap of our JB claims with the WSA boundary) result in the need for any gypsum to be mined off of the WSA itself, as long as consideration of the two WSAs as wilderness areas does not in any way preclude mining and processing the gypsum from our areas adjoining the WSAs.

Also for the record, with respect to our properties, we believe that the proximity of our deposit to the Moore Road and I-70 coupled with the continuing high levels of demand for gypsum product within Utah and the intermountain west auger well for significant, near term future development of the properties.

**63.31 RESPONSE:** See the response to Specific Comment 62.22. Available information indicates that the best gypsum deposits exist to the west of the WSA.

**63.32 COMMENT:** In Emery County, UP&L is lessor under several oil and gas leases, from which it receives rent and royalties, near the following WSAs: 59 (San Rafael Reef), 62 (Devils Canyon), 63 (Sids Mountain), and 64 (Mexican Mountain). Gas production is occurring within 10 miles to the northwest of WSA 63. [Utah Power and Light]

**63.32 RESPONSE:** Production from the Ferron gas field is noted in the Final EIS.

**63.33 COMMENT:** Special care should be taken to evaluate oil and gas potential in the San Rafael Reef, Mexican Mountain, Devils Canyon, and Sids Mountain WSAs in the Geological Survey and Bureau of Mines report on the wilderness proposals to be submitted to the Secretary of Interior. UP&L and other persons commenting on the Draft EIS should have an opportunity to comment on this report, and they are prejudiced by not having it to comment on at the same time as the Draft EIS. The Final EIS should address impacts on these proposed wilderness areas from continued development outside, but very near their borders and re-evaluate their qualities for wilderness designation in light of this potential for development. [Utah Power and Light]

**63.33 RESPONSE:** See the response to Specific Comment 59.28.

**63.34 COMMENT:** Riparian habitat is mentioned here but specific impacts are not detailed. They should be described. [Scott Mills]

**63.34 RESPONSE:** No impacts are projected for the riparian habitat along 18 miles of the San Rafael River with any of the alternatives for the Sids Mountain/Sids Cabin WSA.

**63.35 COMMENT:** Bighorn sheep are among the most sensitive species to human intrusions. Sids Mountain is important bighorn sheep habitat. It is also the largest of the San Rafael WSAs, all of which are of recognized national park caliber. The biological and wilderness values of Sids Mountain outweigh the

desire of those who wish to zoom through it on ORVs. Modern ORVs can go virtually anywhere. To believe that ORV use will be limited to the corridors is wishful thinking. The decision to allow ORV corridors creates more manageability problems than it solves. Presently, primitive recreational use of Sids Mountain outweighs ORV use 5 to 1. Projected use of Sids Mountain is that the current disparity will grow dramatically under the proposed alternative. Most of the ORV users writing in from the national organizations will never come to Sids Mountain. The Coal Wash corridor splits the WSA in two. The Saddle Horse Canyon corridor emasculates the WSA. [David Jorgensen]

**63.35 RESPONSE:** The Partial Wilderness Alternative has been revised to include Saddle Horse Canyon and the North Fork of Coal Wash would be blocked to prevent through traffic. Between 1983 and 1988, the population of bighorn sheep in Sids Mountain almost doubled from 60 to 110 animals even though these corridors are presently open. Under the proposal, all corridors will be marked and approximate supervision will be maintained.

**63.36 COMMENT:** Several potential relict areas have been identified both within the recommended area and outside the proposed boundary. The Pinnacle and Bottleneck Peak are two of these. These areas provide a critical baseline for scientific study of the area's biotic community. While numerous raptor sites are found in the recommended area, some of the most important lie in Buckhorn Wash and are being deleted from the recommendation. The Draft EIS should detail the special features and wilderness opportunities lost in the deleted areas. [Utah Wilderness Coalition]

**63.36 RESPONSE:** The cliff lines in Buckhorn Wash are included within the Partial Wilderness Alternative. Special features are included in the Impacts on Wilderness Values section of the Final EIS.

**63.37 COMMENT:** A full cultural resources inventory appears to be lacking. The Draft EIS does not acknowledge at least one remarkable and fairly well known Fremont-style pictograph (location not disclosed here to discourage vandalism). [Utah Wilderness Coalition]

**63.37 RESPONSE:** See the response to General Comment 20.2. Additional information on cultural resources has been included in the Final EIS.

**63.38 COMMENT:** Impacts on cultural resources should be analyzed for all alternatives. [State of Utah]

a. For the All Wilderness Alternative, no impacts on cultural resources are mentioned or discussed.

b. For the Partial Wilderness Alternative, no impacts on cultural resources are mentioned or discussed.

**63.38 RESPONSE:** Impacts on the preservation of cultural resources have been analyzed as an issue in the Final EIS.

**63.39 COMMENT:** Unfortunately, extensive ORV destruction is also present in the WSAs in the San Rafael. I recently spent several days hiking in these areas and I am appalled at the damage BLM has permitted in areas the law requires to be managed in such manner as to maintain their wilderness characteristics. [Jack Spence]

**63.39 RESPONSE:** See the response to Specific Comment 59.34.

**63.40 COMMENT:** The Draft EIS Volume I states, "WSAs contain about 2 percent of the State total of ORV trails . . . the total miles of ORV routes within WSAs would remain relatively small when compared to the total miles within southern Utah and the State as a whole." Yet , the Draft EIS several times, especially in Devils Canyon and Rockwell WSAs, use ORV use to justify a nonwilderness recommendation. Since wilderness designation will not adversely affect ORV recreationists, BLM should discount any ORV use concerns and actively pursue enforcement of regulations that keep ORVs out of wilderness areas. [Sierra Club, Cache Group]

**63.40 RESPONSE:** Even though ORV use is not considered a Statewide issue, it is an issue for specific WSAs. In Sids Mountain/Sids Cabin WSAs it is an issue because of heavy past ORV use of the ways and canyon bottoms.

**63.41 COMMENT:** As noted in the Draft EIS (Volume I, Table 47) this WSA receives a lot of visitor use each year. BLM finds that Sids Mountain has 2,500 visitor days per year, one of the top 20 in the State. [Sierra Club, Cache Group]

**63.41 RESPONSE:** BLM estimates that Sids Mountain/Sids Cabin WSA still receives approximately 2,500 visitor days use per year.

**63.42 COMMENT:** Title 24, Chapter 2 of the Utah Code requires me to be responsible for the suppression of uncontrolled fires on State-owned lands. The Draft EIS allows for measures to control fire in a wilderness area when the fire threatens human life,

property, or high value resources on adjacent nonwilderness lands, or when the fire threatens to create unacceptable changes to the wilderness resource. Further, the statement assumes that fire fighting measures would be limited to aerial and hand methods. There are a total of 50 sections of State-owned land within the WSA in Emery County. This State in-held land creates a major conflict between my statutory duty to suppress uncontrolled fires on State-owned land and the limits placed upon me by wilderness designation to comply with that duty. I believe it is impractical to think that effective fire control could take place under those limitations and conditions. Adjacent to the study areas are 84 State-owned sections of land. More than within the WSA, designation poses a greater conflict in regard to fire control to the adjacent areas. Effective fire control requires the officer in charge to make quick decisions regarding time and manner of control operations. If I must determine whether or not a fire within the wilderness area poses a threat to human life, property, or high-value resources on adjacent land, I will use valuable time. Time that may make the difference between success and tragic failure. Further, the means which I am restricted to use, hand and aerial, would be drastically ineffective in fighting a fire which threatens human life, property, or high value resource. [LaMar Guymon]

**63.42 RESPONSE:** See the response to Specific Comment 59.36.

**63.43 COMMENT:** Emergency care also falls within my duties. By declaring the land a wilderness, BLM states that increased use will result. Increased use logically leads to an increase in accidents or emergencies. One would suppose that an increased risk of accidents or emergencies would require an increase in effectiveness in responding to the need. Under wilderness designation, however, it is clear that vehicular travel within the area is prohibited. It may be implied from the limitation to hand and aerial methods of fighting fires that there would be severe restrictions and limitations in the manner in which these emergencies or accidents could be handled in the wilderness area. I view these conflicts as significant problems inadequately addressed by BLM in their Draft EIS. I am opposed to the designation as wilderness of these study areas because of the limitations and restrictions placed upon my department when dealing with emergency situations, directly in conflict with my statutory duties. [LaMar Guymon]

**63.43 RESPONSE:** See the response to Specific Comment 59.37.

**63.44 COMMENT:** BLM has done a poor job in analyzing the present recreational use of the San Rafael Swell area. I don't believe they have any data to back up the numbers that they are putting in the EIS. Because of that, I got myself and the club in a little bit of trouble by putting up some sign-in boards in several areas of the San Rafael Swell to try to determine what some of the recreational usage levels were down there. My numbers indicate that there is at least a 5-to-1 ratio in favor of off-road vehicles and I think BLM will have an extremely serious problem in trying to manage those areas if they are closed to off-road vehicles. [Dick Brass, Path Finders Motorcycle Club]

**63.44 RESPONSE:** See the response to Specific Comment 59.38. BLM estimates that annually there are approximately 2,500 visitor days of recreation use in the Sids Mountain/Sids Cabin WSA. Approximately 500 of these are for ORV use.

**63.45 COMMENT:** Sids Mountain for proposed partial wilderness designation is unacceptable. The proposed exclusion of portions of this area for off-road vehicle corridors guts the wilderness value because of destructive segmentation and the introduction of vehicle noise. Who says that "traditional off-road vehicle use" takes precedence over wilderness value? Is that stated in the Wilderness Act? I can assure you that it does not! I urge you not to destroy this potentially magnificent wilderness area. Recommend "all wilderness" designation for Sids Mountain. [William Zwiebel]

**63.45 RESPONSE:** See the response to Specific Comment 63.4. BLM's Partial Wilderness Alternative has been revised to include Saddle Horse Canyon, but would still exclude the north and south forks of Coal Wash and a portion of Bullock Draw.

**63.46 COMMENT:** The statement, "BLM recreation specialist in Utah identified only two areas with important nonmotorized--motorized recreation use conflicts: Moquith Mountain and Crack Canyon" (Draft EIS, Vol. I), brings into question BLM's exclusion of acreage in many areas because of ORV conflicts, particularly Paria-Hackberry, Mexican Mountain, and the Sids Mountain corridors. [Utah Wilderness Association]

**63.46 RESPONSE:** The EIS recognizes that ORV conflicts occur in the listed WSAs.

**63.47 COMMENT:** In the Sids Mountain area, we have special concerns for: (1) Head of Sinbad area and (2) rugged washes west of Wedge. [Sierra Club, Cache Group]

**63.47 RESPONSE:** Both areas noted in the comment are outside the WSA. See the response to General Comment 3.1.

**63.48 COMMENT:** It is an 8,000-acre block of land that you won't be able to get more than 2 miles from a road in. Let's compare that to a statement that was made in the Sids Mountain portion of the EIS where they say that in areas within 2 miles of I-70, the wilderness values could be somewhat compromised by the sounds from I-70. Well, if there is no where in the WSA that you can get 2 miles away from a road on the boundary or one of those ORV corridors, it sounds to me like there's potential that the wilderness values in the entire Sids Mountain WSA will be compromised. [Utah Wilderness Association]

**63.48 RESPONSE:** See the response to Specific Comment 63.4.

**63.49 COMMENT:** I'm concerned about two WSAs in the San Rafael Swell: Sids Mountain and Mexican Mountain. These two areas are the closest slickrock areas of the Colorado Plateau to people from Salt Lake City. There are thousands of people from the Wasatch Front who'd love to escape to these areas, especially since they are closer than the national parks. [Martin Barth]

**63.49 RESPONSE:** BLM's Proposed Action for the Sids Mountain/Sids Cabin WSA is a Partial Wilderness Alternative of 80,084 acres or almost 99 percent of the unit.

**63.50 COMMENT:** The Draft EIS should include the petrified wood areas in Cane Wash under "Wilderness Special Features." [Utah Wilderness Coalition]

**63.50 RESPONSE:** See the response to Specific Comment 63.13.

**63.51 COMMENT:** Note that Sids Mountain is the largest WSA on the San Rafael River. It offers excellent canoeing and river running through narrow winding canyons, colorful mesas, and numerous geological wonders. In short, the entire WSA provides outstanding opportunities for solitude and primitive recreation in a very natural environment. [Rudy Lukez]

**63.51 RESPONSE:** BLM's wilderness inventory indicated that the entire WSA provides opportunities for primitive recreation and 76,920 (95 percent) meets the criterion for outstanding opportunities for solitude.

**63.52 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that, even though

it acknowledges the presence of the Emery County Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accordingly, and in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**63.52 RESPONSE:** See the response to Specific Comment 25.23.

**63.53 COMMENT:** In a paper entitled "Discussion of an Option to Proposed Wilderness Designation on the San Rafael Swell" by the Emery County Economic Development Council the following statements are made: "With few exceptions, we concur with the findings as they were published in the site specific analysis for each of these areas in March of 1983. We come to an even more complete concurrence with the recommended findings of the BLM, which proposes setting aside 366,345 acres in eight of the nine proposed Wilderness Study Areas." "Due to the geographic nature of the land that has been designated as wilderness, it has to be considered as wilderness. Accordingly, we would be acting irresponsibly if we were to discourage or oppose some wilderness designation in Emery County. But we see in wilderness designation, some status that would encourage visitation of a broader audience than we are now receiving." "There is a certain portion of our County that is deserving preservation and protection." It is very disappointing to have local officials say one thing then do completely otherwise. To take a position that there will be no wilderness on the San Rafael does nothing towards resolving the wilderness issue on San Rafael. [Utah Wilderness Association]

**63.53 RESPONSE:** See the response to Specific Comment 59.45.

**63.54 COMMENT:** The Draft EIS identifies eight WSAs (Parunuweap, North Fork Virgin River, Cottonwood Canyon, Mexican Mountain, Sids Mountain, Steep Creek, North Escalante Canyons/The Gulch, and Mt. Pennell) as areas "targeted by county or joint government plans for development." In most instances, the Draft EIS describes what those development plans are, but there is no discussion in the document concerning development plans for Sids Mountain. What are they? [Utah Wilderness Association]

**63.54 RESPONSE:** The individual analyses for Sids Mountain and Mexican Mountain WSAs indicated that Emery County was investigating the possibility of proposing national park status for the two WSAs. This



concept is no longer supported by Emery County officials.

**63.55 COMMENT:** In Volume I, it is indicated that "Utah's mining industry now accounts for less than 3 percent of the State's total employment." In Emery County, over 50 percent of the local work force is either in mining or a utility-related position. The Draft EIS indicates that Emery County is one of six counties that could have "the greatest potential for significant impacts resulting from designation" yet the BLM Proposed Action does not appear to take this into consideration. We ask that BLM carefully weigh their recommendations and decisions as they complete their Final EIS. [Emery County]

**63.55 RESPONSE:** See the response to Specific Comment 59.47.

**63.56 COMMENT:** We believe that wilderness designations will negatively affect business opportunities elsewhere in the county as well as directly remove significant acreages of Emery County from any future coal planning options. This process will permanently limit the economic growth potential of Emery County. [Consolidated Coal Company]

**63.56 RESPONSE:** The EIS indicates that over the long term, wilderness designation would cause a slight change in local economic conditions from those which would occur with the No Action/No Wilderness Alternative. This situation would result from exploration and development of uranium from valid mining claims in existence at the time of wilderness designation. Such claims could be developed but under more restrictive conditions than they could be without wilderness. As a result, about 80 jobs would be created with uranium development in the San Rafael Reef WSA with wilderness as opposed to approximately 160 jobs that would be created without wilderness. One hundred and sixty jobs would represent 2.4 percent of the total projected Emery County work force of 6,700 jobs by the year 2010 (Utah Office of Planning and Budget, 1987). The period or length of such employment is unknown. Other economic factors would not be affected by wilderness designation. Live-stock grazing levels would not change as a result of wilderness. Recreational use is projected to increase at a rate of between 2 to 7 percent per year in the foreseeable future with or without wilderness. Other mineral resources known to exist or projected to exist within the WSA do not support a conclusion that significant development would occur with wilderness.

**63.57 COMMENT:** A State section on the north boundary cuts into a section of the San Rafael River-- is this section to be acquired? (I cannot identify it be-

cause of the poor map, other than being south of the Wedge.) [Michael Salamacha]

**63.57 RESPONSE:** BLM has no plans to acquire the described State section (T. 20 S., R. 10 E., sec. 16).

**63.58 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**63.58 RESPONSE:** See the response to General Comment 14.27.

**63.59 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to:

1. Protect the tax base.
2. Foster agriculture and industry, including mineral reduction and processing plants, together with uses.
3. Stabilize and improve property values.

We do not feel that the BLM Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine wilderness study areas as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possibly affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986, to become a matter of record. Quoting from Section C of this plan, I conclude: "C. Open Space - In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County and accordingly, the county has adapted a zoning resolution in accordance with the earlier mentioned

comprehensive plan and its accompanying statement of intent.

Further, Emery County positions itself:

1. To support the highest, economically allowable development of known mineral and energy resources throughout the county.

2. To utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable.

3. To maintain at least present levels of AUMs on public lands.

4. To preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands. Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statutes.

5. To support land exchanges within the county where they can be shown to be economically beneficial to the county, and only when the county officials are provided opportunities for input in the decision process.

6. To study intensively all areas included in the Wilderness Study Areas 023, 054, 029A, 007, 045, 068 A, and 067, including drillings and other appropriate samples. While the county recognizes that there are areas in the county of critical environmental concern, not enough is known regarding subsurface minerals and resources. Under no circumstances will the county agree to any wilderness designations without a thorough analysis of all potential resource developments affected thereby. On these matters the county intends to play a role in the decision making process as provided by law. [Emery County]

**63.59 RESPONSE:** County zoning is not legally applicable to Federal lands. As a matter of policy, BLM consults with State, local, and other Federal agencies regarding their land use plans. The BLM land use planning process has a formal procedure for coordination with State and local land use plans through a "Governor's consistency review." Also, see the responses to General Comments 23.4, 23.8, and 24.3.

**63.60 COMMENT:** References to bighorn sheep in the San Rafael Swell units are confusing. For exam-

ple, the Draft EIS states, "27 percent of the total range" of the North San Rafael herd is in Mexican Mountain WSA (page 21, column 2, paragraph 6 of the Mexican Mountain WSA analysis, Volume VI), while Sids Mountain WSA contains habitat for 100 percent of the herd (page 18, column 1, paragraph 3 of the Sids Mountain WSA analysis, Volume VI). [State of Utah]

**63.60 RESPONSE:** All of Sids Mountain WSA is considered to be potential desert bighorn sheep habitat. The sentence was confusing and has been deleted in the Final EIS. Most of the Mexican Mountain WSA is habitat for desert bighorn sheep, and this represents about 27 percent of the total habitat for the sheep in the North San Rafael area.

**63.61 COMMENT:** Sids Mountain WSA has moderate wilderness-quality values and a high degree of conflict compared with the other WSAs in the San Rafael region. The major conflicts are with uranium and gypsum resources and OHV use for recreation and livestock management. The BLM's proposed 78,480-acre Partial Wilderness Alternative reduces recreation conflicts. However, some other conflicts are not resolved. The BLM Partial Wilderness Alternative would not adequately mitigate mineral or livestock conflicts. The southern 1/3 or 1/2 of the WSA would have to be deleted to eliminate the livestock conflict. High-quality wilderness values throughout the WSA, such as in the Little Grand Canyon, Sids Mountain, Eagle Canyon, and others, would benefit from wilderness management. [State of Utah]

**63.61 RESPONSE:** The quality of wilderness values in Sids Mountain WSA is discussed in the Final EIS. The impacts of wilderness designation and nondesignation on wilderness values, as well as on mineral exploration and development and off-highway vehicle use for recreation and livestock management purposes, are analyzed. Production of locatable minerals in the WSA is not currently occurring and economic considerations for such production are not favorable. With the exception of uranium, it is unlikely that exploration or development of locatable minerals, including gypsum, would occur in the foreseeable future even without wilderness designation. Both the All Wilderness and Partial Wilderness Alternatives would limit potential exploration and development opportunities for uranium to areas under valid mining claims at the time of designation. Although some production could occur, most opportunities would be foregone. Closure of 13 miles of vehicular ways would occur with the Partial Wilderness Alternative versus closure of 27 miles of ways with the All Wilderness Alternative. The changes in livestock management and supervision that would be necessary with such

closure and the resulting costs and inconvenience to livestock permittees would be less with the Partial Wilderness Alternative.

## SECTION 64 MEXICAN MOUNTAIN WSA

**64.1 COMMENT:** A public hearing was held on November 13, 1985, "for the purpose of gathering public input on the wilderness designation of the San Rafael Swell area and possible alternatives to wilderness designation." At this time I would like to submit the transcript of that hearing for the public record. At that public hearing a straw poll was conducted to determine which land use actions the public wished to pursue. Participants were asked to rank seven different options according to their personal preference. Each ranking was given a point value, with the first choice given seven points, and the last choice only one point. The results were as follows: The number one choice, with 584 points, was to "put all efforts into opposing wilderness designation on the Swell." The option of supporting wilderness designation on the Swell placed sixth, with 140 points. The least preferred alternative was to support a national park designation on the Swell. In order to represent the public interest as elected officials, the Emery County Commission issued a formal statement in which it was stated, "The Commission has concluded that it cannot support any designation upon the San Rafael Swell by any agency that would result in restrictive and exclusionary management practices beyond those practices currently employed by the Bureau of Land Management." In other words, we cannot support anything other than multiple use management of the Swell. [Emery County]

As public officials, we are obligated to represent the majority will of our county citizens. We feel we have done so in taking the position we have taken.

**64.1 RESPONSE:** See the response to Specific Comment 59.1.

**64.2 COMMENT:** The Draft EIS stated BLM's objective for their Partial Wilderness Alternative is to analyze as wilderness that portion of the WSA with the most outstanding wilderness characteristics and to eliminate conflicts with popular ORV and campsite use areas. Assembly Hall peak and Window Blind Peak, nearly 3,000 vertical feet of mountain, are impassable to ORVs and are the key visual focus for the outstanding scenery. BLM's proposal to drop these areas clearly conflicts with this objective. The recommendation is inconsistent with the character of the area.

BLM does not produce any methodology or location information which establishes which area they consider "most outstanding" and which area meets wilderness standards. Absent from this document is the method, a description of its implementation, and a map showing the conclusions. BLM's conclusions are arbitrary and unsupported by the record.

BLM also fails to show the preferred ORV areas and where they judge wilderness designation is outweighed by ORV use. The Draft EIS should present this in a map form and show how that area can be protected with ORV use to prevent damage of its natural values. BLM has long accepted that they will sacrifice this area to the ORV. This is not a legal position. By law, BLM must continue to take actions to protect the area and not just turn it over. Without information on the significant conflicts and their location, it is impossible to adequately comment on the effect this would have on designation. [Utah Wilderness Coalition]

**64.2 RESPONSE:** The objective as stated in the EIS is correct. The Partial Wilderness Alternative was to include those areas of the WSA which contain the most outstanding wilderness characteristics while eliminating conflicts with ORV use. Vehicle use does occur around the base of Window Blind Peak and Assembly Hall Peak. It is the intent of BLM to manage both primitive and mechanized recreational use with the Partial Wilderness Alternative. Also, see the responses to General Comments 2.13, 3.11, 3.36, 8.11 and 22.5.

**64.3 COMMENT:** The impact of perimeter roads is often overstated in the Draft EIS. The analysis of many of the WSAs overestimates the impact from perimeter roads and, as a result, incorrectly concludes that certain large areas are not suitable for wilderness designation. For example, in the Mexican Mountain WSA, which is in the San Rafael area, the area between the cherry-stemmed road and the cliffs above the river was deleted in the proposed agency action. Last month, I hiked from the road to the cliffs, and I crossed only one weathered set of vehicle tracks in an area that the Draft EIS refers to as being heavily impacted by ORV use. [John Veranth]

**64.3 RESPONSE:** It is true that in places it is possible to hike from the Indian Bench cherry-stemmed road to the cliffs on the north side of the San Rafael River and encounter minimum ORV use. However, the area is used by vehicles and BLM has formulated the Partial Wilderness Alternative to manage both primitive and mechanized recreation in this area.

**64.4 COMMENT:** Volume I states the Proposed Action "includes all areas and acres currently judged

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)

by BLM to meet the test of suitability. Units may have low wilderness values but no identified conflicts with other resources." I basically agree with this criteria; however, I wish to comment on how the criteria was applied. There are many areas where the Draft EIS identifies no conflicts with other resources which were not proposed for wilderness. These areas lack significant human imprints and are manageable as wilderness therefore by BLM's own criteria they should have been recommended. Specific examples include: the area between the road and the canyon rim in Mexican Mountain WSA, the entire Cedar Mountain range, large portions of the King Top WSA, the Cheesebox WSA, the south portion of the Scorpion WSA, much of Mount Pennell, etc. [John Veranth]

**64.4 RESPONSE:** See the responses to Specific Comments 64.2 and 64.3 and General Comment 3.5.

**64.5 COMMENT:** In several areas BLM correctly identified errors in the inventory and enlarged the recommended boundary outside the present WSA. Additional areas warrant similar attention. The Wilderness Inventory Policy required BLM to identify areas having wilderness activity opportunities that were largely natural. The boundaries of the WSA were to be drawn to the limit of the significant impacts of man. BLM recognized that large natural areas were being deleted in the inventory and asked for an exception to this policy. That exception placed requirements on BLM to document in detail the reasons supporting the deletion. The Director's exception specifically did not allow deletions of areas possessing special wilderness features and opportunities for wilderness grade activities. Nothing in the inventory unit file or in the Draft EIS indicates compliance with the Director's requirements. Ample evidence from our volunteers during various comment periods has indicated that outstanding wilderness values can be found within the areas deleted by the Director exception. The deleted portion of the area contains important habitat for bighorn sheep and is essential for the proposed antelope program. The best scenic views of the collective elements of this are extraordinary from many points in these deleted areas. Recent IBLA decisions have found this Director's exception to have been misapplied. In view of all of this, BLM needs to reassess the deleted portions of the original WSA (both the north and south parts) and make wilderness recommendations on the whole area. [Utah Wilderness Coalition]

**64.5 RESPONSE:** See the response to General Comment 3.1.

**64.6 COMMENT:** BLM's recommendation does not adequately protect all of the wilderness quality lands found here. Designation of this WSA as a wilderness will provide important protection for the San Rafael River and the San Rafael Reef. [Sierra Club, Cache Group]

**64.6 RESPONSE:** About 26 miles of the San Rafael River and all of the San Rafael Reef within the WSA are included within BLM's proposed Partial Wilderness Alternative.

**64.7 COMMENT:** I would suggest the all wilderness recommendation for the following reasons. On a recent trip to Mexican Mountain, the roadway and the San Rafael River in that area, I observed excellent solitude. There were numerous scenic beauties and presently there is some access to them. The problem with the area is the access has been used--and in my opinion unlawfully--by the Emery County road commission or the commission itself and they have trespassed this road to get inside the current WSA. It is my suspicion that this road is unlawful as the Emery County Attorney mentioned earlier that his perception was that they have always set aside certain areas and that they would always be protected.

This WSA has been invaded by Emery County. There has been intrusion in there and they have filled up a wash and a culvert and recently it has been reclaimed although it is still accessible. That act belies the statement that the wilderness area does not only increase access to that area but it also defaces the entire area in my view.

The partial wilderness cherry-stem proposal includes that trespass road, as well as the exclusion of the widening of the cherry-stem coming from the west into the WSA which should not be excluded from the wilderness area.

I would urge that the recommendation be revised to include the area just south of the Mexican Mountain road extending all the way to the rim of the San Rafael Canyon. Presently, only the rim is proposed as the boundary for the wilderness area. That is inappropriate. That would allow ORV use all the way to the rim of the canyon which would grossly disturb the solitude of that area. [William Russell]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

**64.7 RESPONSE:** The road maintenance referred to in the comment was unauthorized. Attempts have been made to rehabilitate it. See the responses to Specific Comments 64.2, 64.3, and 64.11 and Appendix 11 in Volume I for the rationale of BLM's Proposed Action.

**64.8 COMMENT:** The San Rafael Swell should be held under wilderness study protection until national park status can be carefully analyzed. [Wendall Anderson and John Lockhart]

a. I have some knowledge of the San Rafael area and am of the opinion that it merits national park status. It should be held under wilderness study protection until national park status can be carefully analyzed. The area should include all of the Sids Mountain and Mexican Mountain WSAs and additional wildlands and the more developed land around the Wedge, Buckhorn Draw, and along the San Rafael River. This could either be a new park or an addition to the Canyonlands and Capital Reef National Parks.

b. The San Rafael Reef and Swell should be a national park. Until it becomes so, it should be protected by wilderness status. The small isolated areas proposed by BLM won't do it. It needs large areas to protect the integrity of this special place. To sacrifice this whole area, so a few dirt bikers can have fun, doesn't make sense. The All Wilderness Alternative must be adopted in all the WSAs around the San Rafael Reef and Swell.

**64.8 RESPONSE:** See the response to General Comment 3.30.

**64.9 COMMENT:** Boundary adjustment to the WSA, eliminating 13,000 acres deserving of wilderness protection is unnecessary to mitigate ORV conflicts. Conflicts do exist near the San Rafael campground and Assembly Hall and Window Blind Peaks and are difficult if not impossible to prevent. Perhaps a boundary adjustment in this specific area is justifiable. But BLM's proposal to exclude lands between the San Rafael River Road and the river and for much of the river itself are insupportable. Currently there is little or no ORV conflict in these areas because there is little ORV use there. Without protection, however, eventually Indian Bench will be as ORV impacted as the off-road areas in Buckhorn Wash. The same is true in the excluded area from the Window Blind Peak area southeast along the river. Even with the Assembly Hall and Window Blind Peak areas in the proposal,

BLM acknowledges that ORV users and wilderness users can be managed by including this unit in the manageability alternative. [Slickrock Outdoor Society]

**64.9 RESPONSE:** See the responses to Specific Comments 64.2 and 64.3.

**64.10 COMMENT:** The cherry-stemmed road on Indian Bench is nothing more than a way and a very vague way at that. But regardless of that fact, the cherry-stem road just ruins the area as a wilderness area and it will make the area difficult to manage. ORVs will have access to the heart of the area. I also feel that Jackass Benches and Drowned Hole Draw need to be in the WSA. [Glen Lathrop]

**64.10 RESPONSE:** The Indian Bench road receives use and maintenance on a regular basis. Jackass Benches and Drowned Hole Draw were eliminated from the WSA with BLM's 1980 final wilderness inventory decision. Also, see the response to General Comment 3.1.

**64.11 COMMENT:** Equally disturbing is that the current recommendation reflects impacts that have occurred illegally and, hence, is in violation of the IMP. From the outset of the BLM wilderness review, Mexican Bend has been supported for wilderness by the public and BLM. The March 1983, site-specific analysis (SSA) recommended this area as suitable. The SSA noted there was an abandoned access way leading to Mexican Bend but that it was revegetating, substantially unnoticeable, and met the criteria for naturalness in a WSA. In 1984 a trespass road was bladed by Emery County into Mexican Bend. Rather than require total reclamation, BLM has simply removed the area from its suitable recommendation. This is in violation of the IMP and must be reversed. UWA and BLM conducted a field trip into the area to discuss this issue, and we have included in this comment a letter sent to BLM on June 27, 1986, which presents a detailed discussion of this problem. [Utah Wilderness Association]

**64.11 RESPONSE:** The SSA referenced was a draft document intended to facilitate public participation. Comments were received on that document which indicated more consideration should be given to not designating areas which had historically been accessible to local residents by vehicle.

In 1984, BLM did discover that portions of the vehicle way extending to Mexican Bend had been

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)

bladed by Emery County. BLM required that an installed culvert be removed and that the road surface be scarified in such a way as to protect existing perennial vegetation while facilitating establishment of new vegetation. When monitoring identified that vehicle use continued in the reclaimed area, equipment was used to place dirt and large boulders and to create an impassable cut bank in order to block vehicle access and facilitate revegetation. A sign was also installed to explain the purpose of the closure. See the response to General Comment 5.1.

**64.12 COMMENT:** BLM correctly finds that boundary marking doesn't present a management problem affecting wilderness designation. Exchanges now being proposed by the State would return the present State lands to the Federal government. All the State lands in and adjacent to this WSA are proposed to be exchanged. The private land holdings within the WSA lack any potential mineral development (even the low grade uranium isn't found in this small parcel). Potential development by the private owner is unlikely due to the absence of water. Exchange of this private holding should be mutually advantageous to all sides. [Utah Wilderness Coalition]

**64.12 RESPONSE:** The project BOLD (State/ Federal land exchange proposal) is no longer being actively pursued by the State of Utah. In addition, the State of Utah has reversed its position (UBSL, 1987) regarding exchange of in-held State lands within any particular WSA. See the response to General Comment 6.3. There are no private lands within the WSA.

**64.13 COMMENT:** Buckhorn Wash within the WSA but outside the recommended partial wilderness area has no written rationale for dropping this area. This area does not present management problems and offers special wilderness features. An identified threatened raptor nest in the area is being dropped. Much of the identified ancient Indian rock art sites are found in this area. The eastern boundary in this area represents deletions made in the inventory which failed to follow the inventory policy. South of the river another recommended deletion removes Assembly Hall Peak and Window Blind Peak. Except for a few acres west and south of Assembly Hall Peak, ORV use isn't present and management of future use isn't a problem. No rationale covers dropping this portion of the area which isn't involved in the BLM's rationale supporting the Partial Wilderness Alternative. [Utah Wilderness Coalition]

**64.13 RESPONSE:** The Prickly Pear Flat area (the benches about the rim west of Buckhorn Draw and east of Red Canyon) has been a traditional ORV use area and was removed from the Partial Wilderness Alternative for that reason. The remaining canyon rims would leave a narrow band of land which would be difficult to manage as wilderness. Also, see the responses to Specific Comments 64.2 and 64.3.

**64.14 COMMENT:** The Mexican Mountain WSA contains some of the most spectacular wilderness in the San Rafael Swell. Black Dragon Canyon, Prickly Pear Flats, Black Box, Window Blind Peak, and Swasey's Leap are all very well known and increasingly popular primitive recreation areas. The Draft EIS states that: "The WSA contains the greatest diversity of surface geology of any area its size in the San Rafael Swell. There are few canyons that can be compared to the Black Boxes of the San Rafael River." Thirty-four miles of the San Rafael River are proposed for Wild and Scenic River designation. There is no question that this entire area is highly scenic, abounds with primitive recreational opportunities, and contains extremely high wilderness qualities including practically unlimited solitude. Why then are you recommending only partial wilderness for this area? The ever-present off-road vehicle is the villain here. As of right now, ORVs have over 80 percent of the State available to play in. Why your bureau should take it upon itself to promote ORV use in pristine wilderness areas is beyond my comprehension. Yet that is precisely what you propose to do in this WSA. I am adamantly opposed to the cherry-stem on Indian Bench. ORVs are very destructive and will detrimentally affect the vegetation and wildlife habitat in the area. The noise from these vehicles will detract from the sense of solitude in the rest of the wilderness. I do not understand why you recommend "No Wilderness" for Cheesebox Canyon because of its proximity to Highway 95, and then turn around and recommend a jeep road right into the heart of this pristine wilderness! It is absolute nonsense!! I am also opposed to dropping the acreage to the south and west of Indian Bench. The ORV juveniles already have too many areas that they can readily and easily destroy. Wilderness is a much rarer and more precious commodity in this country. [Scott Delong]

**64.14 RESPONSE:** Black Dragon Canyon and most of Prickly Pear Flat are not within the WSA. The Black Box and Swasey's Leap are within the Partial Wilderness Alternative which is BLM's Proposed

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

Action. See the responses to Specific Comments 64.2 and 64.3 regarding off-road vehicle use.

**64.15 COMMENT:** BLM's Proposed Action would leave an ORV corridor that would be inconsistent with the wilderness proposal. [Utah Wilderness Association and Carleton Detar, et al.]

a. The proposed partial wilderness recommendation cuts the heart out of this area by excluding most of the San Rafael river bottom and turning the Black Box area into a thin unmanageable peninsula. This sacrifice was presumably made to allow ORV access. ORV travel is inimical to foot and horseback use. ORV noise impacts extend far beyond the narrow corridors of travel.

b. The greatest abomination in BLM's recommendation is the recent decision to delete the Mexican Bend area from the "suitable" recommendation and open up the area to ORVs. This proposal sacrifices the finest primitive camping area in the unit along the San Rafael River, threatens the security of the unique rock art panels near Spring Canyon, promises harassment of bighorn sheep in Spring Canyon since it leaves the canyon accessible to ORVs, and is certain to increase conflicts between wilderness recreationists and ORVers. Wilderness designation of the Mexican Bend area is inconsistent with past decisions which closed the area to ORVs and recommended primitive area status for much of the Mexican Mountain WSA.

c. It now appears that BLM is allowing the destruction of the San Rafael by off-road vehicles. The route in the Mexican Mountain WSA which was supposedly reclaimed has now been recommended by BLM as unsuitable for wilderness. This area was originally recommended in the earlier SSA proposal by BLM into wilderness designation yet now it is open to damage from ORV use around Mexican Bend.

**64.15 RESPONSE:** Terrain (ruggedness and vertical relief) is expected to allow for the management of the Black Box as wilderness even with vehicle access to points along the rim. Portions (8 miles) of the San Rafael river bottom would not be designated under the Proposed Action while 26 miles would. Some noise impacts may occur in areas where vehicle use occurs adjacent to designated wilderness. Vehicle control measures may be needed at the mouth of Spring Canyon if the Partial Wilderness Alternative is implemented. It is accurate that under this alternative

camping at Mexican Bend would not be limited to primitive use and vehicle camping would occur. Some level of conflict between primitive recreationists and vehicle recreationist is possible at whatever location along the San Rafael River the wilderness boundary is set. Mexican Bend is an area where interest in vehicle use has been demonstrated over an extended period.

**64.16 COMMENT:** I urge you to adopt the "All Wilderness Alternative" for these WSAs. Since you have excluded the small area near I-70 because of vehicle sounds, surely you must realize that allowing ORVs into the center of these tracts would be totally inappropriate. [Martin Barth]

**64.16 RESPONSE:** Eight miles of the Indian Bench road was cherry-stemmed from the WSA during the wilderness inventory process. BLM does not think that vehicle use in the areas that would not be designated as wilderness under the Proposed Action compares to the use occurring on I-70.

**64.17 COMMENT:** BLM should not delete portions of the WSA for ORV use. [Utah Wilderness Association and Rudy Lukez]

a. The proposed 13-mile cherry-stemming of the WSA from Swinging Rock to Mexican Bend near the Lower Black Box will open up land that is now unimpacted. This area should be added to the BLM's wilderness recommendation. If this cherry stem is created, the integrity and manageability of this area will be significantly affected. BLM constantly complains throughout the Draft EIS that easy management of wilderness is an important criteria.

b. BLM's reasoning for excluding so much acreage is based on ORV conflicts. However, these conflicts are manageable as is indicated in the inclusion of the All Wilderness Alternative for Mexican Mountain in the Manageability Alternative in Volume I. The Draft EIS exaggerates the ORV conflicts. It is true areas around the San Rafael Campground and the portion of the base of Window Blind Peak nearest the campground have been damaged by ORVs. However, impacts from ORVs north of the "cherry-stemmed" river road are virtually nonexistent and there is no justification for leaving all of the land between the road and the cliffs out of the preferred alternative.

**64.17 RESPONSE:** See the responses to Specific Comments 64.2 and 64.3. Lands along the road from

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

San Rafael campground (Swinging Bridge) to Red Canyon are not within the WSA.

**64.18 COMMENT:** BLM has made a sound proposal for wilderness here. My only difference would be to move the proposed boundary to the west of Red Canyon about 1 1/2 miles to the pinch in the WSA. The purpose of this would be to preserve the solitude on the mesa and point overlooking the canyons below. Like the other San Rafael WSAs, the proposed wilderness here would be one more key to a core of wildlands around the Swell. Like these other WSAs, this area is habitat for a number of interesting species some of which are rare, threatened, or endangered. The geological sequence is perhaps the best in the entire San Rafael Swell. Because of these reasons wilderness designation for most of the WSA seems appropriate. [Michael Van Note]

**64.18 RESPONSE:** The Partial Wilderness Alternative boundary west of Red Canyon was inadvertently omitted from the map in the Draft EIS. It follows the west rim of Red Canyon, north of the WSA boundary. All of the mesa points west of Red Canyon would not be included in the designated area with the Partial Wilderness Alternative.

**64.19 COMMENT:** The proposed wilderness does not properly address the following issues:

1. A well maintained county road traverses the heart of this proposed wilderness area; making the area available to all.

2. There are two airplane landing strips in the proposed WSA. One is located near the San Rafael River at the mouth of Spring Canyon. The other one is approximately 4 miles west on a mesa near the head of Sulphur Canyon at some mining prospects. Both are available by road and by air.

3. There is considerable evidence of man's presences in both Spring Canyon and Nates Canyon left from the uranium prospect days; signs, paintings, and prospect-holes.

4. The salinity of the San Rafael River makes it unfit to drink or to bath in. What few springs that are in the area are also unfit for human use.

5. Closure of any roads in the area would curtail and possibly eliminate livestock grazing in the area. Most of these roads were first made by livestock

men years ago for the maintenance of their livestock. The long distance between grazing areas require access by motor vehicles. [Albert Hyatt]

**64.19 RESPONSE:** The county road is indicated in the EIS narrative and maps. The air strip at the mouth of Spring Canyon (Mexican Bend) is discussed in the Final EIS. The head of Sulphur Canyon, T. 21 S., R. 13 E., sec. 28, is not within the WSA.

No surface disturbance or other evidence of man's presence which would be incompatible with wilderness designation is known to be present in Spring or Nates Canyons.

Most water sources within the WSA are extremely alkaline, however, the San Rafael River is known to be used for primary contact activities (floatboating).

The impacts to livestock grazing for all alternatives are discussed in the Final EIS.

**64.20 COMMENT:** We believe that there will be a direct negative effect on future mining opportunities at the Emery Mine (especially expanded production through surface mining) by these wilderness designations. BLM efforts to protect proposed high quality Class A scenery (e.g., Sids Mountain) or to protect visibility at the proposed VRM Class I areas will ultimately include attempts by the Federal government to reduce fugitive dust emissions in Castle Valley and surrounding areas through the coal mining and air quality permitting processes. Requirements for fugitive dust controls above those currently practiced by the Utah coal industry will lead to additional production costs and constraints which would weaken the competitiveness of our Emery County reserves. [Consolidated Coal Company]

**64.20 RESPONSE:** See the response to Specific Comment 59.8.

**64.21 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**64.21 RESPONSE:** Information regarding fossils has been added for the Final EIS.

**64.22 COMMENT:** Several important relict habitat areas may be present within the recommendation. Another possible relict area identified by BLM exists



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

near I-70 in a portion of the roadless area dropped by BLM in the inventory. These relict areas offer irreplaceable scientific study opportunities. The information gained from these areas is essential for determining range condition on other similar lands. [Utah Wilderness Coalition]

**64.22 RESPONSE:** According to the BLM San Rafael RMP (USDI, BLM, 1989), the vegetation relict areas are not inside the Mexican Mountain WSA.

**64.23 COMMENT:** Along with habitat and plant conservation, we must identify and mitigate the threats facing the species involved. BLM has a stated policy of protection for sensitive, threatened, and endangered plants that have gained recognition in the Federal Register. Unfortunately, however, the agency in Utah has a lack-luster record of effective management of even listed endangered plants. The Dwarf Bear Poppy (Arctomecon humilliss) is a case in point. While this species does not occur in or even near any WSAs, the agency has failed to effectively prevent deterioration of populations. This situation prevails despite the fact that the plant was listed nearly seven (7) years ago. Similarly, the candidate species, Pediocactus despainii, (listing package in preparation by FWS) of the San Rafael Swell faces increasing jeopardy because of BLM ignorance or inaction. Known to occur in at least two WSAs, Crack Canyon and Sids Mountain, the San Rafael pincushion cactus may also be found in the Mexican Mountain WSA. This diminutive cactus faces increasing numbers and frequency of ORV use in its habitat. BLM even sponsors an annual ORV event that sees hundreds of ORVs run with loose supervision near the Crack Canyon WSA and adjacent to critical habitat for this beautiful little cactus. Since the agency has sponsored the motorcycle event each spring, increasing numbers of ORV tracks have been observed criss-crossing the terrain where these rare endemics are found. The disregard for the species and the habitat vital to its survival is of great concern to the use. This case represents only one circumstance, but we fear that it depicts the approach and policy that BLM intends to use in addressing their land management trust. [Marvin Poulson]

**64.23 RESPONSE:** See the responses to General Comments 13.1, 13.5, and 13.6 and Specific Comment 59.15.

**64.24 COMMENT:** BLM's statement in Volume I (a rationalization for not selecting Vegetation as an Issue) refers to threatened and endangered species by

stating, "Because necessary measures would be taken to protect these species, it can be concluded that the viability of populations of threatened, endangered, or sensitive plant species would be preserved with any of the alternatives." This statement is flawed. The Mexican Mountain SSA clearly indicates on page 40 (Vol. VI):

"additional access would become established in the 12,850 acres of the WSA not designated. This could increase the threat to Sclerocactus wrightiae. The area not designated includes the one known site for this species. Also in the undesignated, ORV use could eventually become established into the habitat area for Erigeron maguirei due to its proximity to Buckhorn Draw."

Anything but the All Wilderness Alternative could result in the loss of these species because the area is open to ORVs. Similar situations exist in other WSAs (Moquith Mountain and other San Rafael WSAs) with respect to threatened and endangered plant species. It cannot be automatically concluded these species will survive without wilderness designation especially given the reluctance to close areas to ORVs and the fact the Section 7 consultation and mitigation will only be done on proposed projects which would cause surface disturbance such as mineral activity. Realistically speaking, there is no protection for these species in areas open to ORVs. [Utah Wilderness Association]

**64.24 RESPONSE:** See the response to Specific Comment 59.15.

**64.25 COMMENT:** Although BLM did recognize rare and sensitive plant species in the Draft EIS, the analysis was incomplete. The failure to identify vegetation as a major Statewide issue, particularly when three major issues deal with livestock grazing, shows a bias against natural values and an inconsistency in the selection of issues. [Utah Wilderness Association]

**64.25 RESPONSE:** See the response to General Comment 13.1. Impacts on vegetation including special status species is analyzed as an issue for the Mexican Mountain WSA in the Final EIS.

**64.26 COMMENT:** The Draft EIS admits the Proposed Action alternative will not protect the habitat of two endangered plant species in the WSA, Sclerocactus wrightiae and Erigeron maguirei. It also

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

recognizes these species will face threats from ORV damage where they currently exist. Wilderness designation will protect these species from ORV damage and deserves BLM's support. The Draft EIS also notes that under the Proposed Action, "some physical plant damage and soil compaction could occur in areas not designated and inadvertent loss of individual plants of six candidate or proposed plant species could result." It is shortsighted not to recommend wilderness designation for these areas when the negative impacts of not doing so are so clear. [Utah Wilderness Association]

**64.26 RESPONSE:** See the response to Specific Comment 59.15.

**64.27 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. Accordingly, I submit to you with this statement, a copy of our resolution numbered 4-17-86 concerning Federal reserve water rights. [Emery County]

**64.27 RESPONSE:** The resolution is contained in the Final EIS in Volume VII-A.

**64.28 COMMENT:** The impact of wilderness designation on the salinity of the San Rafael River should be analyzed. [Emery County]

a. Being that the San Rafael and the tributaries to the San Rafael are major contributors to the Colorado River salinity problem, we are concerned with what measures might be taken if downstream areas are designated wilderness.

b. The Draft EIS is remiss in that it does not take into consideration the water salinity problem on the San Rafael, Muddy, and Price Rivers and it further does not indicate how this problem will be dealt with if wilderness is designated on these streams. Because these bodies of water and tributaries to these bodies are major contributors to the Colorado River salinity problem and because the Bureau of Reclamation has been given the charge of solving the salinity problem and because the Sierra Club vs. Block decision regarding a Federal reserve water right may have a major impact on what can be done, it is felt that there should be no wilderness recommendation made nor should there be any wilderness designated until these issues are addressed and resolved favorably to Emery County.

**64.28 RESPONSE:** Additional information on salinity is provided in the Final EIS.

**64.29 COMMENT:** Our Emery reserve is located on upstream watersheds of streams which flow through the proposed wilderness areas. A wilderness designation would impart to the Federal government a reserved right to all unappropriated waters which flow through the wilderness area. This water right is considered superior to the rights of all future appropriators. Such a restriction could mean that water would be unavailable for future mining needs including coal cleaning, dust suppression, drinking water, and irrigation during reclamation and thus eliminate the possibility of future mine expansions. [Consolidated Coal Company]

**64.29 RESPONSE:** See the response to Specific Comment 60.15. Approximately 34 miles of the San Rafael River flow through the Mexican Mountain WSA.

**64.30 COMMENT:** The EIS should point out that wilderness designation in the San Rafael Swell would lead to stricter air and water quality standards that would interfere with industry. [Emery County and Consolidated Coal Company]

a. The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions. Future mineral production could be hindered by regulation of water running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation.

b. In enhancing water quality of streams flowing through wilderness management areas, efforts to improve water quality will likely be directed at upstream point source discharges, which will include coal mine discharges. More stringent effluent limitations applied to coal mines through the PDES permitting process would likely increase production costs and possibly preclude future mine expansions. [Emery County and Consolidated Coal Company]

**64.30 RESPONSE:** See the response to Specific Comment 59.21.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

**64.31 COMMENT:** We anticipate that future Federal coal leasing decisions, which are essential for a stable coal mining industry in Utah, will be negatively influenced by BLM's responsibilities to maintain and improve air and water quality in designated wilderness areas. This conflict will increase pressures on BLM to delete certain coal tracts from the competitive leasing process if it is perceived that development may have negative impacts on wilderness values. Future coal production throughout Utah will be reduced by this process. [Consolidated Coal Company]

**64.31 RESPONSE:** See the response to Specific Comment 59.26.

**64.32 COMMENT:** UP&L has pending and perfected water rights in the San Rafael River basin amounting to 150,000 acre-feet and 141.184 cfs for power, stockwatering, and irrigation use. UP&L has purchased all irrigated land along the San Rafael River and believes that the San Rafael River is totally appropriated during average or below average water years, when potential conflicts with wilderness areas over water would occur. In addition, UP&L has purchased and developed water rights on tributaries to the San Rafael River for use in its existing steam electric plants in Emery County. Continued use of those water rights is essential to UP&L's generation of electricity in its large Emery County plants. [Utah Power and Light]

**64.32 RESPONSE:** See the response to Specific Comment 60.15.

**64.33 COMMENT:** Emery County has vast natural resources in the San Rafael Swell. There are millions of barrels of oil in the tar sands within the WSA. The San Rafael tar sand deposit (parts of T. 23 and 24 S., R. 9, 10, and 11 E.) contains measured reserves of 300 million barrels of oil in place in 25,600 acres plus another 250 million barrels of speculative reserves in another 5,600 acres. (Major Tar Sand and Heavy Oil Deposits in the U.S., Interstate Oil Compact Comm., 1984, p. 255). This large tar sand reserve is in jeopardy of never being developed if any of the surrounding WSAs are designated as wilderness. The reason for this is the possibility of development impacts on visual vistas in areas that can be seen from the wilderness lands. If these visual vistas are ever used then forget any tar sand development at any time in the future. [Southeastern Utah Association of Local Governments]

**64.33 RESPONSE:** See the response to Specific Comment 59.23. Approximately 28,664 acres of the San Rafael Swell Special Tar Sand Area are in the Mexican Mountain WSA. While tar sand is present, production within the WSA is unlikely due to low tar content, limited areas of outcrop, and the presence of more favorable deposits outside the WSA. There has been no industry interest in leasing or development in the WSA. [Utah Wilderness Coalition]

**64.34 COMMENT:** BLM correctly describes both pre-FLPMA and post-FLPMA leases and claims as presenting no management problem within wilderness areas. The inactivity of claim holders in proving the validity of these claims is evident. The Wilderness Management Policy describes the management necessary to protect wilderness values. [Utah Wilderness Coalition]

**64.34 RESPONSE:** Pre-FLPMA oil and gas leases have been phased out of the WSA. Two post-FLPMA leases containing 1,120 acres still exist. These two leases contain wilderness stipulations. BLM projects that up to 40 acres will be disturbed with exploration activities associated with oil and gas leases. There are currently 111 mining claims in the WSA containing about 2,220 acres. BLM projects that exploration and development of the uranium resources will occur in the long term with associated surface disturbance of up to 28 acres.

**64.35 COMMENT:** All evidence from geologic analysis including exploration within the WSA strongly supports the BLM's conclusion that oil and gas deposits of commercial size are highly unlikely to occur. BLM indicates that there is a favorable chance that significant oil-impregnated rocks are present. The partial wilderness boundary is drawn to exclude the uneroded formations containing this deposit. What is missing from the BLM analysis is an estimate of the commercial possibility for development. The estimates of barrels of oil are grossly misleading. First, BLM only chose the upper limit of the range of the estimate, and secondly, that estimate does not reflect the amount of petroleum that can be extracted. The resource quality is also not discussed. Of all the exotic tar sand deposits now being considered, this area has the lowest deposit density. Commercial development of the better deposits seems now unlikely because of better alternatives. Analysis of this low grade of deposit of tar in the Mexican Mountain areas is likely to conclude that it would take more energy to extract this low

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)

grade deposit than the net energy produced. [Utah Wilderness Coalition]

**64.35 RESPONSE:** BLM has not drawn the partial wilderness boundary to exclude specific portions of the tar sand deposit within the Mexican Mountain WSA. The analysis indicates that if the tar sand were to be developed within the San Rafael Swell, it would be by in-situ methods. In the Mexican Mountain WSA, this provides about a 30-percent recovery of the estimated oil resource of between 10 and 500 million barrels of in-place reserves. Even though there is a high favorability and a high certainty that tar sand resources exist within the WSA, BLM does not project development of this resource in the foreseeable future because of low tar content, limited areas of outcrop and because deposits more favorable for development exist outside the WSA. Also, see the response to General Comment 15.41.

**64.36 COMMENT:** Uranium has been found in the contact zone between the Moenkopi and Chinle Formations. Past uranium mining in other formations not found in the WSA in the Tidwell mining area has produced some ore. The conditions leading to concentrations of ore in Tidwell are not found to occur in the WSA. The estimates of ore production produced by BLM are not well supported. While ore bearing formations do occur within the WSA, the conditions necessary to concentrate uranium are not prevalent in this same area. Geologic collapses, asphaltitic impregnation, and sedimentary pipes leading to deposits rolls of ore are not common within the important formation in the WSA. These occurrences are concentrated in the otherwise dispersed ore. The average ore density within the Chinle Formation is 0.001 percent while productable ore needs to be 0.2 percent with much higher prices and a market demanding production. Deposits are highly localized and extensive exploration is necessary to find them. The exposed formation has been explored and nothing of development potential found. The remaining formation will only be explored with drilling through several hundred feet of sandstone. Since ore bodies in producing mines in this formation are usually less than 5 feet in diameter and less than 100 feet long, the costs of the required frequent drilling or exploration will probably exceed the commercial value of the discovered deposit. The rating of uranium deposits fails to consider the commercial feasibility of exploration and development. The market for uranium continues to decrease. Economic, political, and ecological reasons gain more strength now, reducing the demand and future of the market

for commercial nuclear power and nuclear weapons. Ample areas outside the WSA are available for uranium supplies and this needs to be considered by BLM in making their wilderness recommendations. [Utah Wilderness Coalition]

**64.36 RESPONSE:** BLM projects that exploration and development of the uranium resource within the Mexican Mountain WSA will occur in the long term, resulting in surface disturbance of up to 28 acres. See Appendix 6 in Volume I of the Final EIS for an explanation of mineral development projections.

**64.37 COMMENT:** In Table 1 of the Draft EIS for this area, BLM lists significant environmental consequences of different decisions. We find BLM generally agrees with us that uranium, oil and gas, potash, and tar sand development are infeasible because of many different factors. Because their development is infeasible, they are not significant consequence of wilderness designation. The BLM listing of these in Table 1 conflicts with consistent application of the environmental analysis. BLM is requested to remove insignificant or infeasible developments from this table. Only significant conflicts or values should be listed. [Utah Wilderness Coalition]

**64.37 RESPONSE:** Table 1 has been revised for the Final EIS. However, because of the potential for oil and gas exploration and development for uranium, BLM concludes that the potential impacts on mineral exploration and development is a significant long-term issue for the EIS.

**64.38 COMMENT:** Our analysis of the regional geology indicates that many of the areas proposed for wilderness designation have the potential for future hydrocarbon production. The northeast portion of Garfield County and the eastern portions of Wayne and Emery Counties, WSA areas numbered 38 through 41, 58, 59 and 64, have potential for hydrocarbon production from stratigraphic and structural-stratigraphic traps in Paleozoic and Mesozoic age rocks. We have leasehold interests in many of these areas and would be willing to meet with BLM personnel and discuss our concerns and interests. [Texaco, Inc.]

**64.38 RESPONSE:** See the response to Specific Comment 64.35 and General Comment 15.41 for a discussion of tar sand potential. Most of the hydrocarbon potential of the WSA would be in the tar sand deposits in the Moenkopi Formations. The only other formation with hydrocarbon potential is the Paradox Formation

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

which is as much as 9,000 feet below the surface of the WSA. Fracturing is thought to have allowed potential oil to migrate out of this formation to produce the tar sand in the Moenkopi.

**64.39 COMMENT:** Tar sand in this WSA probably occurs primarily in the Cottonwood Draw facies of the Black Dragon Member of the Moenkopi. The tar sand is typically thin and lean to very lean; perhaps leaner than the published figures would indicate. In general, however, mineral conflicts should not be judged by comparisons with other areas, tar sand potential of Sunnyside STSA has little to do with tar sand potential of this WSA; each WSA should be judged on its own merits. [State of Utah]

**64.39 RESPONSE:** The Final EIS has been changed to read the "Black Dragon Member." Sunnyside tar sands was used for comparison purposes to give an indication of the relative size and richness of the deposits within the WSA. It was felt that without the comparisons, the numbers related to a single deposit would not be meaningful to many readers.

**64.40 COMMENT:** Uranium and Associated Minerals: If it is true that "subsurface deposits of unknown size are certain to be present," then it is unreasonable to also state that "due to economic limitations, it is unlikely that new producible deposits will be found in the WSA." If there is sound potential for significant discoveries, short-term economics should not be considered. [State of Utah]

**64.40 RESPONSE:** BLM projects that exploration and development of the uranium resource will occur in the WSA in the long-term future.

**64.41 COMMENT:** In 1921 Congress tied up the hydrocarbons. Paul Judd and George Kofford had found a 50-foot vein of wax cutting the Kiabab limestone which runs under Mexican Mountain. They put the rock into tubs and steel barrels, boiled the wax out of the rock, and when the water cooled, they would skim the wax off the top. In those days the wax was worth nearly \$1/lb. When they found out about the new law, some called it the blue law of 21, they had to give it up. I know about this personally because I have seen the veins and one of the five places they did their digging. I would like to challenge the committee which did the study on Mexican Mountain that they did not include this in their report. [Owen McClenahan]

**64.41 RESPONSE:** No information concerning wax deposits within the Mexican Mountain WSA could be found in existing literature. Mineral wax is likely associated with and of the same value as the sand.

**64.42 COMMENT:** Has the tar sand on the south side of Hondoo Canyon found in the Wingate sandstone been included in this study? Has the tar sand found in the Navajo Formations in the mouth of Coal Wash been included in the study? What was the input on the two oil seeps in Saddlehorse and one oil seep in the left fork of Mexican Seep? [Owen McClenahan]

**64.42 RESPONSE:** None of these areas are within the Mexican Mountain WSA.

**64.43 COMMENT:** In Emery County, UP&L is lessor under several oil and gas leases, from which it receives rent and royalties, near the following WSAs: 59 (San Rafael Reef), 62 (Devils Canyon), 63 (Sids Mountain) and 64 (Mexican Mountain). Gas production is occurring within 10 miles to the northwest of WSA 63. [Utah Power and Light]

**64.43 RESPONSE:** Production from the Ferron gas field is noted in the Final EIS.

**64.44 COMMENT:** Special care should be taken to evaluate oil and gas potential in the San Rafael Reef, Mexican Mountain, Devil's Canyon and Sids Mountain WSAs in the Geological Survey and Bureau of Mines report in the wilderness proposals to be submitted to the Secretary of Interior. UP&L and other persons commenting on the Draft EIS should have an opportunity to comment on this report, and they are prejudiced by not having it to comment on at the same time as the Draft EIS. The Final EIS should address impacts on these proposed wilderness areas from continued development outside, but very near their borders and reevaluate their qualities for wilderness designation in light of this potential for development. [Utah Power and Light]

**64.44 RESPONSE:** See the response to Specific Comment 59.28.

**64.45 COMMENT:** The OIR (3-) mineral rating is exaggerated. It is based on a "high potential for uranium, oil-impregnated rocks (tar sand), and hydro-power. We believe in each case the potential for development is very low. There has been no determination of the technical feasibility of building a dam on the San Rafael River in the WSA. Even if it were

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)

technically feasible, there seems no reason to build the dam. In addition, the social and environmental implications of a dam on the San Rafael in this area make it very unlikely a dam could ever be built. The potential for large scale uranium markets or development anytime in the foreseeable future is bleak. The important uranium occurrence in the Morrison Formation is outside the WSA, as are the workings in Red Canyon. Even during the uranium "boom days," this area was not important. [Utah Wilderness Association]

**64.45 RESPONSE:** The OIR rating is not used in the Final EIS. The Mexican Mountain WSA is projected to have long-term potential for uranium exploration and development with or without wilderness designation. The low likelihood for a dam being constructed on the San Rafael River within the WSA is discussed in the Final EIS.

**64.46 COMMENT:** The tar sand resource is unimportant and overstated. It is minuscule when compared to other deposits in Utah and BLM recognizes the probability of development as low. Utah Division of Oil, Gas and Mining and Utah Geologic and Mineral Survey (UGMS) representatives have stated likewise, "the uranium/vanadium and tar sand potential of these areas is thought to be somewhat overstated" (RDCC Wilderness Subcommittee's Report to the Governor). There does not seem to be any noticeable difference between the All Wilderness and Proposed Action Alternatives in relation to mineral values. [Utah Wilderness Association]

**64.46 RESPONSE:** See the responses to Specific Comment 64.35 and General Comment 15.41.

**64.47 COMMENT:** This WSA has 11 important falcon nesting sites which wilderness designation will best protect. [Sierra Club, Cache Group]

**64.47 RESPONSE:** There are 11 documented falcon nests within the WSA, with BLM's Partial Wilderness Alternative 10 of these sites would be included.

**64.48 COMMENT:** The Draft EIS says that "major species of interest include . . ." There is no basis given for what constitutes a "species of interest." There should not be particular species singled out in a Federal EIS. [Scott Mills]

**64.48 RESPONSE:** Some wildlife species have been singled out through legislation such as the Threatened

and Endangered Species Act and the Migratory Bird Treaty Act. The Final EIS refers to these as "special status species." In addition, it is common practice to identify species of management concern which act as indicator species. This was done in this case.

**64.49 COMMENT:** There is a herd of burros in the Sid's Leap, Mexican Mountain areas. I have spent a lot of time in that area and I have seen them. They continue to increase and grow and flourish without wilderness. [Stan Truman]

**64.49 RESPONSE:** The presence of wild burros within the WSA is noted in the EIS. With or without wilderness designation, these animals are protected by the Wild and Free-roaming Wild Horse and Burro Act of 1971.

**64.50 COMMENT:** Mexican Mountain WSA also contains habitat for three Federally endangered wildlife species. Black-footed ferrets are identified as potentially inhabiting the WSA, and peregrine falcon and bald eagle have both been documented in the unit. All of these species would benefit from an all wilderness recommendation. Bighorn sheep, a wilderness-dependent species, will also benefit. The Final EIS should reflect the recent transplant of these animals into the Spring Canyon area. The Draft EIS acknowledges that under the Proposed Action, "impacts could occur that might affect wildlife sightings". [Utah Wilderness Association]

**64.50 RESPONSE:** The Affected Environment section for the Final EIS describes recent introductions of bighorn sheep. The Environmental Consequences section analyzes potential impacts on wildlife including special status species for all alternatives.

**64.51 COMMENT:** While important historic sites have been identified within the recommended area, a comprehensive archaeological inventory still is needed. At this time only 0.3 percent of the recommended area has been inventoried. [Utah Wilderness Coalition]

**64.51 RESPONSE:** See the response to General Comment 20.2.

**64.52 COMMENT:** ORV use in this area needs to be fully reported, including conflicts with existing ORV use and vehicular camping/sightseeing. The EIS lacks a map and text describing the location and degree in this activity, its impacts, and specific factors preventing ORV management. In the analysis the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

description of the area's naturalness fails to describe any significant impacts from ORV use within the present WSA. Field investigation by our volunteers indicates that open area ORV use only occurs in noticeable amounts near the San Rafael Gorge Campground, along the excluded portion of the bench along the river, and up 1 mile of the draw south of Assembly Hall Peak. Other areas within the WSA and south of the WSA boundary are not impacted by ORV use. Limestone Bench has three different ways ending more than 2 miles before the WSA boundary. Infrequent use is limited to these ways and no significant increase in use has been seen on these routes. The way into Lockhart Wash shows very little use and almost no use off the route. Several locations were identified for construction of barriers or gates to manage ORV access. [Utah Wilderness Coalition]

**64.52 RESPONSE:** The EIS reports the ORV use situation as it is known. In addition to those use areas described in the comment, there has been ORV use in the Indian Bench, Mexican Bend, and Swasey's Leap areas.

**64.53 COMMENT:** The MFP makes the decision to begin controlling ORVs in this area. This plan has not been implemented. At this time no effort has been made by BLM to control the use of ORVs in this portion of the San Rafael Swell. The comments pertaining to the State describe some of the management techniques adopted by other agencies for the control of ORVs. None of these have been tried and therefore BLM can not accurately assess their effectiveness. BLM cited a study on ORVs performed in this area. That study addressed only use on the present access roads outside the WSA and did not discuss general area use or any specific areas within the WSA. BLM inconsistently applies this ORV management argument in the WSA. Areas (along the San Rafael River for example) found not to have ORV management problems are included within the wilderness recommendation. Other areas, nearly identical, are found to have ORV management problems. [Utah Wilderness Coalition]

**64.53 RESPONSE:** The Utah State University study referenced did identify a general ORV use area extending down the San Rafael River to about Oil Well Draw. Other areas where vehicle use and access would be permitted under the Partial Wilderness Alternative (areas not designated) also show signs of vehicle use and that use is occurring, or has occurred, is supported by public comments received during the wilderness review. These areas include Indian Bench between the

road and the rim of the Black Box, Mexican Bend, and on the jeep trail to Swasey's Leap. Current management is directed toward maintaining suitability for possible wilderness designation until a final decision is made, rather than changing existing vehicle use patterns unless they change in a way that adversely affects suitability; for example control measures taken as a result of the road grading to Mexican Bend.

**64.54 COMMENT:** ORV use appears more limited to fewer areas than BLM describes. In those limited areas, BLM has proven that management of ORVs does not cause problems. The initial assumptions given state that BLM will have the necessary resources to manage this area. There are many techniques which can prevent ORV impacts. No management benefits can be given between the boundaries of the partial wilderness recommendation and the all wilderness recommendation. Similar boundary configuration situations are found in both. Enlarging the WSA boundary presents the best management recommendation. Management of ORVs is not a justifiable reason to delete major areas from wilderness designation. [Utah Wilderness Coalition]

**64.54 RESPONSE:** Boundary configurations differ between the All Wilderness and Partial Wilderness Alternatives in terms of the size and/or terrain of the areas to the north and south of the area not proposed for designation. Also, see the responses to General Comments 8.19 and 8.23.

**64.55 COMMENT:** Unfortunately, extensive ORV destruction is also present in the WSAs in the San Rafael. I recently spent several days hiking in these areas and I am appalled at the damage BLM has permitted in areas the law requires to be managed in such manner as to maintain their wilderness characteristics. [Jack Spence]

**64.55 RESPONSE:** See the response to Specific Comment 59.34.

**64.56 COMMENT:** The entire area should be closed to ORV use to protect the fragile natural environment which is today unimpacted. [Sierra Club, Cache Group]

**64.56 RESPONSE:** Closure of the entire WSA to ORV use is not proposed in the present planning documents and therefore it would not occur under the No Action/No Wilderness or Partial Wilderness

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)

Alternatives. Closure would occur under the All Wilderness Alternative.

**64.57 COMMENT:** The Draft EIS states, "WSAs contain about 2 percent of the State total of ORV trails . . . the total miles of ORV routes within WSAs would remain relatively small when compared to the total miles within southern Utah and the State as a whole." (I-185) Yet, the Draft EIS several times, especially in Devils Canyon and Rockwell WSAs, uses ORV use to justify a nonwilderness recommendation. Since wilderness designation will not adversely affect ORV recreationists, BLM should discount any ORV use concerns and actively pursue enforcement of regulations that keep ORVs out of wilderness areas. [Sierra Club, Cache Group]

**64.57 RESPONSE:** Although use of off-road vehicles is not a Statewide issue, it is an important consideration in specific WSAs. Past and potential mechanized use of some areas of the Mexican Mountain WSA cause this to be an issue in this case.

**64.58 COMMENT:** Title 24, Chapter 2 of the Utah Code requires me to be responsible for the suppression of uncontrolled fires on State owned lands. The Draft EIS allows for measures to control fire in a wilderness area when the fire threatens human life, property, or high-value resources on adjacent non-wilderness lands, or when the fire threatens to create unacceptable changes to the wilderness resource. Further, the statement assumes that fire fighting measures would be limited to aerial and hand methods. There are a total of 50 sections of State-owned land within the WSA in Emery County. This State in-held land creates a major conflict between my statutory duty to suppress uncontrolled fires on State-owned land and the limits placed upon me by wilderness designation to comply with that duty. I believe it is impractical to think that effective fire control could take place under those limitations and conditions. Adjacent to the study areas are 84 State-owned sections of land. More than within the WSA, designation poses a greater conflict in regards to fire control to the adjacent areas. Effective fire control requires the officer in charge to make quick decisions regarding time and manner of control operations. If I must determine whether or not a fire within the wilderness area poses a threat to human life, property, or high-value resources on the adjacent land, I will use valuable time. Time that may make the difference between success and tragic failure. Further, the means which I am restricted to use, hand and aerial, would be drasti-

cally ineffective in fighting a fire which threatens human life, property, or high-value resources. [LaMar Guymon]

**64.58 RESPONSE:** See the response to Specific Comment 59.36.

**64.59 COMMENT:** Emergency care also falls within my duties. By declaring the land a wilderness, BLM states that increased use will result. Increased use logically leads to an increase in accidents or emergencies. One would suppose that an increased risk of accidents or emergencies would require an increase in effectiveness in responding to the need. Under wilderness designation, however, it is clear that vehicular travel within the area is prohibited. It may be implied from the limitation to hand and aerial methods of fighting fires that there would be severe restrictions and limitations in the manner in which emergencies or accidents could be handled in the wilderness area. I view these conflicts as significant problems inadequately addressed by BLM in their Draft EIS. I am opposed to the designation as wilderness of these study areas because of the limitations and restrictions placed upon my department when dealing with emergency situations, directly in conflict with my statutory duties. [LaMar Guymon]

**64.59 RESPONSE:** See the response to Specific Comment 59.37.

**64.60 COMMENT:** The Chute section of Muddy Creek frequently has a 4-week period that is suitable for boating, and this section is suitable for boaters of intermediate ability. Your report lists this area as being suitable for boating only about 1 week a year and as being suitable for experts only. This statement is incorrect. The Black Boxes are also suitable for boaters of intermediate ability when this area is boated at lower water levels. I have kayaked through both of these areas. [Doyle Dow]

**64.60 RESPONSE:** See the response to Specific Comment 61.31.

**64.61 COMMENT:** BLM has done a poor job in analyzing the present recreational use of San Rafael Swell area. I don't believe they have any data to back up the numbers that they are putting in the EIS. Because of that, I got myself and the club in a little bit of trouble over Easter by putting up some sign-in boards in several areas of the San Rafael Swell to try to determine what some of the recreational usage



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

levels were down there. My numbers indicate that there is at least a 5-to-1 ratio in favor of off-road vehicles. And I think BLM will have an extremely serious problem in trying to manage those areas if they are closed to off-road vehicles. [Dick Brass, Path Finders Motorcycle Club]

**64.61 RESPONSE:** See the response to Specific Comment 59.38. BLM estimates that annually there are approximately 4,000 visitor days of recreational use in the Mexican Mountain WSA, of which about 2,500 are related to ORV use.

**64.62 COMMENT:** The Recreation and Wildlife Committee in the county is aware of extensive use of the San Rafael areas for recreation, serving campers and ORV users from throughout the State. These people bring money into our area and help our small businesses and help our economy. The Draft EIS statement is inadequate in the extent there are many roads in this area that are not covered by the impact statement. Many trails and ways are used by the ORV users and four-wheel drivers. One of these areas is in the Mexican Mountain area, Pine Canyon. There is a road into Pine Canyon that is not designated in the report. There is also some petroglyphs in that area. There is a concrete dam in Pine Canyon and this indicates that this area has been trampled by man. This shows that it should be continued as a multiple use area. [Stan Truman]

**64.62 RESPONSE:** Known vehicle use activities are described in the EIS. The roaded area in Pine Canyon is outside the WSA.

**64.63 COMMENT:** The statement, "BLM recreation specialists in Utah identified only two areas with important nonmotorized--motorized recreation use conflicts: Moquith Mountain and Crack Canyon" (Draft EIS, Vol. I, p.89), brings into question BLM's exclusion of acreage in many areas because of ORV conflicts, particularly Paria-Hackberry, Mexican Mountain, and the Sids Mountain corridors. [Utah Wilderness Association]

**64.63 RESPONSE:** The EIS recognizes that ORV conflicts occur in the listed WSAs.

**64.64 COMMENT:** The area recommended by BLM for wilderness designation contains wilderness values unequalled elsewhere. Each of their components of the wilderness study criteria is met. Permanent protection of the many natural values of this area has been

a common goal for both conservationists and BLM. Conservationists proposed that this area be included in a San Rafael National Park. BLM was in the process of making a primitive area recommendation (the agency's strongest administrative protection possible) when the wilderness review started. [Utah Wilderness Coalition]

**64.64 RESPONSE:** A portion of the Mexican Mountain WSA has previously been considered by BLM for primitive area status but the proposal was not finalized due to the initiation of BLM's wilderness review process under FLPMA. Also, see the response to General Comment 3.30.

**64.65 COMMENT:** Wilderness activities are all heightened by the presence of the San Rafael River as it cuts deep, narrow paths through the sandstone. River travel is extremely challenging on this section of the river. The high degree of technical skill to kayak this river adds to this area's wilderness value. The dark, high cliffs that rise vertically from next to the river give the Black Box its name. Dark canyon walls prevent almost all sun from reaching the bottom. The more than 1,000 feet of sandstone forming the plateau wall just north and east of the river with several high peaks offer excellent opportunities for technical climbing. No recorded ascent (other than by helicopter) is known for Mexican Mountain and Assembly Hall Peak. Window Blind Peak is rated Grade 1 class 5.6 in the easiest summit route. These large mountains and the cliff walls are a growing attraction for technical rock climbers. The potential for first ascents and new routes makes this area offer a outstanding opportunity for technical rock climbing. BLM incorrectly excluded two of these peaks from the wilderness recommendation, Window Blind Peak and Assembly Hall Peak, and some of the finest cliff areas in the Buckhorn Draw. [Utah Wilderness Coalition]

**64.65 RESPONSE:** The information presented is generally consistent with the analysis of recreation opportunities presented in the Draft EIS. Ascents of the mountains and peaks are possible as described. It is likely that some of the best cliff areas in Buckhorn Draw for technical climbing are found in the Navajo sandstone outcrops along the road to the north of the WSA. This is the area in Buckhorn Draw known to be used by climbers. Wilderness designation is not necessarily the only or last way to protect and manage this resource. There are no identified threats to cliff faces regardless of wilderness designation. The Black

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

Box and the canyon walls north of it are included in BLM's Partial Wilderness Alternative.

**64.66 COMMENT:** We are especially concerned about the following places within this WSA and the surrounding area: [Sierra Club, Cache Group]

- (1) The Black Box
- (2) Black Dragon Canyon
- (3) Window Blind Peak
- (4) Swasey's Leap
- (5) Prickly Pear Flats
- (6) Jackass Benches
- (7) Drowned Hole Draw

**64.66 RESPONSE:** Black Dragon Canyon, portions of Prickly Pear Flats, most of Jackass Benches, and the upper two-thirds of Drowned Hole Draw are not within the WSA. See the response to General Comment 3.1. The Black Box and Swasey's Leap are within BLM's proposed Partial Wilderness Alternative.

**64.67 COMMENT:** I recently visited the Mexican Mountain WSA and was extremely impressed with the area's potential for wilderness. I understand that your wilderness proposal does not include Assembly Hall Peak, the San Rafael River, or even the Black Boxes. I find this absolutely incredible. These features should be some of the highlights of a wilderness experience in this area, particularly for people on the river. [Mark Lennon]

**64.67 RESPONSE:** About 26 miles of the San Rafael River is proposed for designation with BLM's Proposed Action, as are both the Black Box and the Lower Black Box. Assembly Hall Peak is not within the proposed area for designation under the Partial Wilderness Alternative, but is analyzed for wilderness under the All Wilderness Alternative.

**64.68 COMMENT:** I'm concerned about two WSAs in the San Rafael Swell: Sids Mountain and Mexican Mountain. These two areas are the closest slickrock areas of the Colorado Plateau to people from Salt Lake City. There are thousands of people from the Wasatch Front who'd love to escape to these areas, especially since they are closer than the national parks. [Martin Barth]

**64.68 RESPONSE:** BLM's Proposed Action is to designate 46,750 acres or 78 percent of the Mexican Mountain WSA as wilderness.

**64.69 COMMENT:** I have found outstanding opportunities for solitude are present throughout the WSA and in other areas as outlined in the UWC's proposal. [Rudy Lukez]

**64.69 RESPONSE:** During the wilderness inventory process, BLM field personnel determined that about 90 percent of the WSA meets the criterion for the wilderness quality of solitude.

**64.70 COMMENT:** Any impacts between the road and the San Rafael River are obviously substantially unnoticeable. On a 1986 field trip, we hiked across Indian Bench to the edge of the Black Box overlooking the San Rafael River. Our 0.5 to 0.75 mile trek took us across land which has not been included in the BLM Proposed Action supposedly due to ORV conflicts. On the walk we crossed only one ORV track. It is important to note we were there the weekend following Easter weekend, by far the busiest on the San Rafael. In addition, we did not encounter a single ORV although we spent 2 days in the area. To imply, as the Draft EIS does, if the area were designated wilderness it would not be possible to prevent ORV use, is professionally naive and unacceptable. It is equally unacceptable to leave this area open to ORVs and allow the same resource damage to occur here that is occurring around the San Rafael Campground. [Utah Wilderness Association]

**64.70 RESPONSE:** See the response to Specific Comment 64.3.

**64.71 COMMENT:** The land in question is far more important than "acreage." BLM's recommendation nearly splits the unit in two and fails to protect a large part of the San Rafael River as it passes through the unit. The upper Black Box is a good example. While the river corridor itself is protected, BLM's Proposed Action would allow vehicle access to the rim overlooking the river along the entire Black Box. This could effectively eliminate any opportunities for a wilderness experience for recreationists in the Black Box, a very popular part of the WSA. Dodging beer cans thrown from above is nobody's idea of a good time. BLM's recommendation is disturbing because east of Red Canyon most of the land south of the cherry-stemmed road currently receives very little, if any, ORV use. Here there are many incised drainages dropping rapidly into the Black Box. The undulating landscape between the drainages is dotted with pinyon-juniper forest and grasslands. It is very accessible and interesting hiking terrain leading to

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

one of the San Rafael's most notable features--the upper Black Box. This area was included in BLM's proposed Mexican Mountain Primitive Area. [Utah Wilderness Association]

**64.71 RESPONSE:** The rolling terrain and vegetation discussed in the comment are expected to limit the number and location of places where vehicle access actually reaches the rim of the Black Box. Also, see the responses to Specific Comments 64.2 and 64.3.

**64.72 COMMENT:** BLM's Proposed Action will eliminate protection for 2/3 of the San Rafael River Canyon. The San Rafael River should be protected, as proposed, under the Wild and Scenic Rivers Act and wilderness designation will promote this possibility. Thirty-four miles of this river go through this area. [Sierra Club, Cache Group]

**64.72 RESPONSE:** Wild and Scenic River designations can be any of three types: recreational, scenic, or wild. None of the alternatives analyzed in the EIS are inconsistent with potential Wild and Scenic River designation. Wild and Scenic River designations affect impoundments and developments within a 0.25 mile of the river and may exist independent of wilderness designation. The Partial Wilderness Alternative would not alter consideration of the San Rafael River as a potential wild and scenic river. About 26 miles of the San Rafael River are within BLM's Partial Wilderness Alternative.

**64.73 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to:

1. Protect the tax base.

2. Foster agriculture and industry, including mineral reduction and processing plants, together with uses.

3. Stabilize and improve property values. We do not feel that the BLM Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine WSAs as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possibly affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986 to become a matter of record. Quoting

from Section C of this plan, I conclude: "C. Open Space - In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County and accordingly, the county has adapted a zoning resolution in accordance with the earlier mentioned comprehensive plan and its accompanying statement of intent. Further, Emery County positions itself:

1. To support the highest, economically allowable development of known mineral and energy resources throughout the county.

2. To utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable.

3. To maintain at least present levels of AUMs on public lands.

4. To preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands. Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statutes. [Emery County]

**64.73 RESPONSE:** See the response to Specific Comment 59.43.

**64.74 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that even though it acknowledges the presence of the Emery County Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accordingly, and in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**64.74 RESPONSE:** See the response to Specific Comment 25.23.

**64.75 COMMENT:** In a paper entitled "Discussion of an Option to Proposed Wilderness Designation on the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

San Rafael Swell" by the Emery County Economic Development Council the following statements are made: "We are taking the stand that some wilderness designation in Emery County is in the long term best interest of the county." "With few exceptions, we concur with the findings as they were published in the site specific analysis for each of these areas in March of 1983. We come to an even more complete concurrence with the recommended findings of the BLM, which proposes setting aside 366,345 acres in eight of the nine proposed WSAs." "Due to the geographic nature of the land that has been designated as wilderness, it has to be considered as wilderness. Accordingly, we would be acting irresponsibly if we were to discourage or oppose some wilderness designation in Emery County." "But we see in wilderness designation, some status that would encourage visitation of a broader audience than we are now receiving." "There is a certain portion of our County that is deserving preservation and protection."

It is very disappointing to have local officials say one thing then do completely otherwise. To take a position that there will be no wilderness on the San Rafael does nothing towards resolving the wilderness issue on San Rafael. [Utah Wilderness Association]

**64.75 RESPONSE:** See the response to Specific Comment 59.45.

**64.76 COMMENT:** Mexican Mountain WSA ranks high for wilderness-quality values and high for significance of conflicts compared to the other WSAs in the San Rafael Swell. The major conflicts with uranium, other minerals, and livestock uses are mostly eliminated or reduced by the BLM's proposed 46,750-acre partial alternative. A significant conflict with potential water resource development is not eliminated under the partial. This conflict is probably irreconcilable if the potential dam site is developed, but there are high-quality wilderness values in the same area (the Black Box of the San Rafael River) which also need to be considered in the decision making process. [State of Utah]

**64.76 RESPONSE:** The comment is consistent with information presented in the EIS.

**64.77 COMMENT:** A 345 kV transmission line traverses along a portion of the easterly boundary of this area. This utility corridor has potential for expansion and should be preserved as one of the few pos-

sible utility corridors in this rugged area. [Utah Power and Light]

**64.77 RESPONSE:** The 345 kv line right-of-way does, together with an old railroad grade, form a portion (approximately 3.5 miles) of the eastern boundary of the WSA. Room for potential expansion exists within the right-of-way, to the east of the right-of-way, and where the railroad grade forms the boundary, to the west of the right-of-way. Expansion of the utility corridor further to the west, into the more rugged terrain of the WSA, is not likely.

**64.78 COMMENT:** In Volume I, it is indicated that "Utah's mining industry now accounts for less than 3 percent of the State's total employment." In Emery County, over 50 percent of the local work force is either in mining or a utility related position. The Draft EIS indicates that Emery County is one of six counties that could have "the greatest potential for significant impacts resulting from designation" yet the BLM Proposed Action does not appear to take this into consideration. We ask that BLM carefully weigh their recommendations and decisions as they complete their Final EIS. [Emery County]

**64.78 RESPONSE:** See the response to Specific Comment 59.47.

**64.79 COMMENT:** We believe that wilderness designations will negatively affect business opportunities elsewhere in the county as well as directly remove significant acreage of Emery County from any future coal planning options. This process will permanently limit the economic growth potential of Emery County. [Consolidated Coal Company]

**64.79 RESPONSE:** The EIS indicates that over the long term, wilderness designation would cause a slight change in local economic conditions from those which would occur with the No Action/No Wilderness Alternative. This situation would result from oil and gas exploration and exploration for and development of uranium from valid mining claims in existence at the time of wilderness designation. Such claims could be developed but under more restrictive conditions than they could be without wilderness. As a result, about 20 jobs would be created with uranium development in the San Rafael Reef WSA with wilderness as opposed to approximately 50 jobs that would be created without wilderness. Fifty jobs would represent 0.7 percent of the total projected Emery County work force of 6,700 jobs by the year 2010 (Utah Office of

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

Planning and Budget, 1987). The period or length of such employment is unknown. Other economic factors would not be affected by wilderness designation. Livestock grazing levels would not change as a result of wilderness. Recreational use is projected to increase at a rate of between 2 to 7 percent per year in the foreseeable future with or without wilderness. Other mineral resources known to exist or projected to exist within the WSA do not support a conclusion that significant development would occur without wilderness.

**64.80 COMMENT:** It appears that the WSA and partial boundaries are reversed on Map 3. [State of Utah]

**64.80 RESPONSE:** The maps have been revised in the Final EIS.

**64.81 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**64.81 RESPONSE:** See the response to General Comment 14.27.

**64.82 COMMENT:** UP&L is very concerned also about the effect of air quality restrictions from wilderness areas in the vicinity of its existing Hunter and Huntington plants located in Emery County. The table below lists the WSAs that are in close proximity to the Hunter and Huntington plants. These WSAs and their future affect on UP&L's operations should be considered for each alternative. [Utah Power and Light]

WSA	Name	Distance	
		From Hunter	From Huntington
62	Devil's Canyon	21 S	32 S
63	Sids Mountain	10 SE	20 SE
64	Mexican Mountain	23 SE	30 SE
61	Muddy Creek	34 S	43 S
60	Crack Canyon	41 SE	52 SE
59	San Rafael Reef	31 SE	42 SE
65	Jack Canyon	58 NE	54 NE
66	Desolation Canyon	39 ENE	41 ENE
67	Turtle Canyon	40 ENE	40 ENE
68	Floy Canyon	54 ESE	56 WSA
29	Phipps-Death Hollow	98 SSW	111 SSW
31	No. Escalante Canyon	86 SSW	97 SSW
30	Steep Creek	89 SSW	100 SSW

**64.82 RESPONSE:** See the responses to General Comments 10.3 and 10.5.

**64.83 COMMENT:** References to bighorn sheep in the San Rafael Swell units are confusing. For example, the Draft EIS states, "27 percent of the total range" of the North San Rafael herd is in Mexican Mountain WSA (page 21, column 2, paragraph 6, of the Mexican Mountain WSA analysis, Volume VI), while Sids Mountain WSA contains habitat for 100 percent of the herd (page 18, column 1, paragraph 3 of the Sids Mountain WSA analysis, Volume VI). [State of Utah]

**64.83 RESPONSE:** All of Sids Mountain WSA is considered to be potential desert bighorn sheep habitat. The sentence was confusing and has been deleted in the Final EIS. Most of the Mexican Mountain WSA is habitat for desert bighorn sheep, and this represents about 27 percent of the total habitat for the sheep in the North San Rafael area.

**SECTION 65**  
**JACK CANYON WSA**

**65.1 COMMENT:** There are conflicts in the area with energy development, however, it appears possible to draw a boundary that eliminates most conflicts and still protects the important canyon system. Such a boundary could eliminate impacts caused by past energy exploration and development on the mesa tops and still include the canyons. To make this alternative viable, it would be necessary to recombine Jack Canyon and Desolation Canyon WSAs. Nevertheless, the Draft EIS indicates Jack Canyon WSA is not important for energy and mineral production and the All Wilderness Alternative would not result in a

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)

significant loss of development potential. It would protect the important wildlife and wilderness values described above and is clearly the best alternative for BLM to adopt. [Utah Wilderness Association]

**65.1 RESPONSE:** There is no reference in the Draft EIS which indicates the WSA is not important for minerals. The WSA has known occurrences of oil and gas, tar sand, and oil shale. On a national scale, the quantity and quality of these deposits are low, but this does not necessarily make them unimportant.

The nonsignificant loss of development opportunity cited is in reference to oil shale and tar sand under the All Wilderness Alternative. There could be a loss of development opportunity for oil and gas resources.

**65.2 COMMENT:** This BLM tract should be included as a part of a Desolation Canyon wilderness area complex as proposed by the Utah Wilderness Coalition. This entire WSA must be protected through the "All Wilderness" Alternative. [Sierra Club, Cache Group]

**65.2 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**65.3 COMMENT:** A pipeline, actually a 4-inch pipe, laid on top of the ground and causing no surface disturbance is used as the boundary between the Jack and Desolation Canyon WSAs. BLM admits the pipe could be removed when no longer needed without causing surface disturbance and leaving no indication it ever existed. Indeed, unless you are standing right over or immediately adjacent to the pipe it cannot be seen from either WSA. It is very important this "separation" be rectified before making final judgement on the Jack Canyon WSA, since standing alone the Jack Canyon area may not be a viable wilderness candidate. But when you consider it constitutes half the length of one of Desolation Canyon's major drainages, its importance becomes readily apparent. [Utah Wilderness Association]

**65.3 RESPONSE:** Portions of the pipeline extending down the canyon wall are surface laid. At the north end of the pipeline vehicle access and anchors are present. At the south end, the pipeline is laid along a bulldozed line until it reaches the rim. Near the middle portion of the line, where it crosses the canyon bottom, it is accessed by a road and separate facilities are present. The pipeline and associated disturbances and facilities are visible from some locations within

Jack Canyon and Desolation Canyon WSAs. See the response to General Comment 3.1 and Appendix 11.

**65.4 COMMENT:** There is absolutely no question that this entire area is wilderness. It is remote; it contains many "special features" such as wildlife habitat, Indian ruins and petroglyphs, and historic "old west" cabins; it is incredibly scenic; and it is world famous for its abundance of recreational opportunities. Much of this area is adjacent to the Green River. Desolation and Gray Canyons on the Green River are famous for their whitewater rapids and surrounding wilderness areas. This area is a huge economic drawing card for the State of Utah and deserves to be preserved for the benefit of future generations. All of the Turtle Canyon WSA is recommended for wilderness designation in the Draft EIS. Congratulations! I agree with you entirely. This area is completely natural, completely beautiful, and an integral part of the Book Cliffs roadless unit. Large sections of the Desolation Canyon WSA and Jack Canyon WSA have been dropped by the Draft EIS recommendations. These drops are entirely unreasonable. Once again your agency is willing to destroy a precious commodity (wilderness) in order to possibly dig a few minerals out of the ground. This is one of the largest intact wilderness areas in the entire State (or the entire West) and should be given higher consideration. Wilderness is a rare and precious commodity. The supply of it is always shrinking, and the demand for it is always growing. The lands that we preserve now can only become more and more valuable assets. [Scott Delong]

**65.4 RESPONSE:** See the response to General Comment 8.15 and refer to Appendix 11 in Volume I of the Final EIS for a summary of BLM's rationale for designation or nondesignation of wilderness.

**65.5 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which lead us to this recommendation. [Exxon Corporation]

**65.5 RESPONSE:** See the response to General Comment 15.1. Certain types of access are currently available to evaluate these areas during the study phase. Geophysical work is allowed, as is drilling, if it can be done in a nonimpairing manner on post-FLPMA leases. Such restrictions do not apply on pre-FLPMA leases. The remainder of the comment is noted. It should also be noted that the proposed No Action/No Wilderness Alternative will allow for future exploration activities. Appendix 11 in Volume I provides a summary of the rationale for BLM's Proposed Action.

**65.6 COMMENT:** For oil and gas production, why do you refer to a "3-year average" and a "17-month average"? Use a commonly accepted unit of measurement, e.g. MCF, or give the total production. [Brian Wood]

**65.6 RESPONSE:** A 3-year average was used to indicate yearly production for Peters Point 13. That well only produced for 3 years and is now plugged and abandoned. Total production from the well was 10,714 MCF (thousand cubic feet).

A 17-month average was used for production for Peters Point 101 because that was the total time period for which data was available when the reports were written. Total production, from when it was drilled through 1986, has been 102,130 MCF.

Industry jargon was avoided in the writeup in an effort to make the discussion more understandable for all segments of the public. The text of the Final EIS has been amended to improve consistency in how the data is displayed by showing the figures discussed above.

**65.7 COMMENT:** Why are different dates used for the total production from a well ("April 1985") and from the field ("May 1983")? [Brian Wood]

**65.7 RESPONSE:** These numbers have been updated to reflect production figures as of December 1986 and have been incorporated into the Final EIS.

**65.8 COMMENT:** The WSA meets the requirements for both outstanding solitude and outstanding primi-

tive recreation; 85 percent of the WSA has Class A scenic quality; and the speculative mineral values are only moderate. Slant drilling could be used to explore for oil and gas from outside the WSA. This WSA should receive an All Wilderness recommendation from the BLM. [Owen Severance]

**65.8 RESPONSE:** Mineral values are more than speculative. There are known occurrences of oil and gas, tar sand, and oil shale within the WSA. Slant drilling is viable in some instances for developing oil and gas resources, but adds considerably to costs to find and produce it. This can make development non-commercial.

**65.9 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**65.9 RESPONSE:** A statement has been included in the Final EIS concerning these resources.

**65.10 COMMENT:** The areas I am particularly concerned with are Jack, Desolation, Turtle, Floy, Coal, Spruce, and Bruin Canyons. BLM has looked at mineral values and considered mineral values versus wilderness values. I think probably BLM is supposing a little too much in the mineral area. Maybe I can illustrate with a case in point. The Bookcliffs area and the Desolation Canyon area include some of the most rugged and remote country in Utah. These places have wildlife: black bear, bighorn sheep, mountain lion, deer, and elk. You can grow deer most anywhere. You can grow elk in a lot of places. But there really aren't very many places where you can get a good population of bear and lions. The only reason that they weren't recommended that I can figure out is their low to moderate potential for mineral development. Even if they had great potential for mineral development, the potential for wildlife and wilderness experiences are greater. [J. Barnett]

**65.10 RESPONSE:** Both the wildlife and mineral values of the WSA are addressed and analyzed in the EIS. Rationale for BLM's Proposed Action are summarized in Appendix 11 in Volume I.

**65.11 COMMENT:** In the Jack Canyon WSA the BLM has recommended that zero out of the 7,500 acres be designated as wilderness. They note that there is a wide variety of wildlife including riparian habitat, which Volume I describes as, quote, "unique and limited high value habitat." The descriptions of the impact

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 64: MEXICAN MOUNTAIN WSA (CONTINUED)**

of the no designation alternative do not give specific information as to the impact of development on the riparian habitat. Another problem in this WSA is that, quote, "Only the more common or distinct species are discussed here." What follows after that statement is a discussion of only the game animals and two endangered species. There is no precedence or provision in either the law or the legislation to describe only species which an agency decides as distinctive, and certainly a discussion of impact should not be limited to the most common species. My point here is that non-game species are not given due consideration. In the discussion of impact of the No Action Alternative, BLM notes that: "full mineral development also could result in habitat loss for the Federally endangered peregrine falcon and bald eagle." Given the requirements of the Endangered Species Act, the above stated comment should weigh heavily against the proposed mineral development. After Section 7 consultation, such development will be precluded anyway. The fact that there are six additional candidate species, which are species which require special consideration to prevent them from becoming threatened or endangered, makes this WSA an extraordinary rich area for impacts of wildlife. [Scott Mills]

**65.11 RESPONSE:** It is commonly accepted practice to identify representative species in a community or area and then discuss impacts and habitat requirements for those species. Due to the number of terrestrial (land based) and avian (bird) species which occur within the WSA (and on most wild lands), focusing the discussion on certain sensitive and legally protected species is a practical necessity. See the response to General Comment 16.6.

Jack Canyon was mentioned under unique and high value habitat based on the presence of 120 acres of critical deer winter range along the riparian zone in the bottom of Jack Canyon (p.15, Volume VI, Jack Canyon). The impact of no wilderness designation on deer is discussed on page 23 of the same section.

Potential impacts to peregrine falcons or bald eagles, associated with mineral development, would require Section 7 consultation with FWS and projects would be modified and conducted so as to avoid adverse impacts which could result from proposed development. The text of the Final EIS has been changed to reflect this point. Also, see the responses to General Comments 16.4 and 16.5.

**65.12 COMMENT:** Riparian habitat is mentioned here but specific impacts are not detailed. They should be described. [Scott Mills]

**65.12 RESPONSE:** See the response to General Comment 13.11.

**65.13 COMMENT:** Jack Canyon WSA has low wilderness-quality values and moderate conflicts compared with the other WSAs in the region. Mineral conflicts include actual gas production within the WSA from the Green River and Dakota Formations. Wildlife and livestock values could probably be enhanced more by the proposed No Action Alternative because of potential vegetation treatments. [State of Utah]

**65.13 RESPONSE:** The WSA does not have "low-wilderness-quality values." The Draft EIS and the Final EIS note that 97 percent of the WSA has outstanding opportunities for solitude while the entire WSA has outstanding opportunities for primitive and unconfined recreation. The remainder of the comment is noted. See the summary of BLM's rationale for the Proposed Action in Appendix 11 in Volume I.

**65.14 COMMENT:** The benefits of designating adjacent areas should be discussed. [John Veranth]

a. In the individual WSA sections, the "size" section states areas are of sufficient size to enhance wilderness values. Why was the additional benefit of the adjacent areas not discussed?

b. This is a large contiguous roadless area consisting of 600,000 acres of BLM land. When adjacent State and Indian roadless lands are included, the potential roadless/wilderness area totals about a million acres. The synergistic benefits of the adjacent areas is not fully addressed in the Draft EIS. This large area would allow human impact sensitive wildlife species to spend the entire year in a roadless area since the elevation range encompasses both summer and winter range. Why was the wildlife benefit not considered in the analysis?

**65.14 RESPONSE:** Refer to Volume I of the Final EIS. A new Statewide alternative has been added which analyzes this "cluster" potential. See Chapter I in Volume I for the discussion of wildlife issues.



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA**

**66.1 COMMENT:** The boundaries of the WSA were incorrectly placed during the BLM inventory. [Utah Wilderness Coalition]

a. No other area in Utah is more complex in terms of the varying grades of wilderness qualities and diversity of issues. If BLM had followed the BLM inventory policy, the initial roadless area would have possessed more than 488,640 acres. Fragmentation and piecemeal deletion have reduced this huge area to the present size.

b. In the southern Book Cliffs, BLM dropped from wilderness study the large and natural mountain that is found between the left and right hands of Tusher Canyon. There is not a single significant impact that existed in 1976 to justify the deletion of this area. BLM should follow the inventory boundary policy and move the boundary to the edge of the road in the right hand of Tusher Canyon.

c. The western end of Suluar Mesa was deleted from the study and there are no impacts until the foot of the mesa. BLM produced no record justifying this deletion. The area is natural and by wilderness standards, should be part of the area.

d. In a confusing boundary choice, BLM moved the study area boundary to the middle and top of the southern and western Book Cliffs miles from the last human impacts. We propose recommending wilderness in the whole cliff. Again BLM has no evidence of impacts that would justify moving the boundary the extent they did and delete from study thousands of acres.

e. The IBLA has just recently decided in favor of an administrative appeal filed by the Wilderness Society, Sierra Club, and others concerning this area. That IBLA decision remanded the wilderness recommendation on this WSA and BLM will be performing a second wilderness inventory on this area. In the inventory, the most significant and numerous interim management actions destroying wilderness character have occurred in this area. [Utah Wilderness Association]

**66.1 RESPONSE:** Most of the Suluar Mesa is included within the WSA. Also, the WSA boundary has not been moved in the cliff area. The WSA boundary was established during the inventory phase. The inventory phase has been completed and BLM is not doing any

further inventory. See the response to General Comment 3.1. IMP actions have not significantly affected wilderness character, except where valid existing rights were present.

**66.2 COMMENT:** The deletions proposed in the Partial Wilderness Alternative include large areas which BLM claims contain oil and gas potential (Peter's Point in the north) and coal (Little Park in the middle of the west). The difficulty we have with the deletion at Peter's Point is that BLM has allowed extensive exploration outside and inside the WSA during the wilderness review. The deletion of Peter's Point now appears partially made to remove from wilderness designation an area where BLM allowed actions affecting the suitability for designation. The area does contain oil and gas. The issue is what limited access is necessary for these companies to extract their resource? What cherry-stemmed roads are needed to allow this? The area deleted appears larger than is necessary to meet the needs of the industry. [Utah Wilderness Coalition]

**66.2 RESPONSE:** The partial wilderness boundaries are located based on a combination of factors, including known and predicted location of minerals, vehicle access potential, wilderness qualities, and logical terrain demarcations.

**66.3 COMMENT:** The large area around Little Park Wash should not be deleted from BLM's Proposed action. [Utah Wilderness Association, Utah Wilderness Coalition and Slickrock Outdoor Society]

a. In Little Park, BLM deleted a part of the WSA because of alleged coal extraction. The area deleted includes a large area under and to the east of Little Park which would not be impacted by deep coal mining. BLM has not determined what surface entrances into the coal deposit are needed and if any of these would disturb the surface of the WSA. Here the BLM analysis appears inconsistent. In the north in Turtle Canyon, BLM correctly recognized that coal mining would occur without affecting the wilderness values on the surface. Now in an adjacent area, with the same situation, BLM has not found the same conclusion. No explanation for the difference in conclusions is given. Only a part of the Little Park area recommended to be deleted from the wilderness recommendation is shown to contain recoverable coal. BLM needs to detail the specific surface access needed for mining in that area.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

b. We cannot support the 15,000-acres withdrawal in the Little Park area. BLM admits only 2,900 acres are likely to ever be developed. Why so large a withdrawal? Re-defining the boundary to Little Park Wash would boundary out lands needed for accessing the coal resource and provide a more manageable boundary.

c. In Little Park Wash BLM has deleted 15,000 acres from wilderness consideration. The conflict is with coal development, although the Draft EIS states only 2,900 acres (on the western edge) are likely to ever be developed, and none of the coal is likely to be developed in the foreseeable future. None of the coal is leased. Why has 15,000 acres been deleted? The "minor" reasons given are to allow rancher access to a watering pond and potential ORV use. Neither reason is valid since the rancher can maintain historical access if the area is designated wilderness, and the Draft EIS admits there is currently no ORV use in the area. If BLM feels it necessary to draw out the developable coal resource, it can be done by moving the boundary to Little Park Wash.

d. No acreage should be deleted in the Little Park area. The deleted acreage is critical winter wildlife habitat and one of few areas in this expansive wilderness with opportunities for winter recreation. Ample coal supplies are available from existing mines in Carbon and Emery Counties, many of which are shut down now due to lack of markets. The long range mining forecast is poor, not because of wilderness but because there is simply no market. It appears BLM chose to exclude this area from its recommendation simply because a potential conflict exists, not after carefully considering the wilderness values present and prudently comparing them to the value of developing these reserves. It isn't necessary to sacrifice Desolation Canyon wilderness for coal development when supplies are more than adequate outside of any proposed wilderness.

**66.3 RESPONSE:** The 2,900 acres are interspersed among 8,000 acres which are underlain by recoverable coal. A watershed boundary east of the recoverable coal area was established as a manageable boundary for the alternative. The boundary of the proposed Partial Wilderness Alternative in the vicinity of Little Park Wash is considered to be a manageable location which provides a logical compromise between wilderness and nonwilderness uses. See the response to Specific Comment 66.2.

**66.4 COMMENT:** BLM failed to consider other areas outside the WSA for providing these minerals and alternative methods of meeting those needs. These need to be analyzed before a deletion is justified. [Utah Wilderness Coalition]

**66.4 RESPONSE:** The focus of the EIS is the area within the WSA; hence, it is inappropriate to provide detailed analysis for other areas outside the WSA. The various resources within all the WSAs are compared to the State and national perspectives in Volume I, and these serve to indicate the given magnitude of potential. See the responses to General Comments 8.3, 9.10, 15.16, and 15.20.

**66.5 COMMENT:** A major part of the roadless area was never inventoried. FLPMA required BLM to inventory all of its lands for potential wilderness designation. The BLM failed to inventory approximately 23,000 acres which are part of the Nutters Hole roadless area in the Naval Oil Shale Reserve. Within this area are 8 miles of the Green River, the first part of a trip thousands enjoy each year. Other oil shale reserves managed by BLM were inventoried by BLM. Colorado inventoried a similar reserve. BLM has no record of any inventory. We request that BLM inventory this area as required by FLPMA. Would oil shale development impact the area? This is unknown but the mineral deposit is not in conflict with river protection. Regardless of this development, BLM would have to protect this candidate wild and scenic river. We believe this is not just a legal requirement but a reasonable request. [Utah Wilderness Coalition]

**66.5 RESPONSE:** At the beginning of the inventory process, it was determined that the Utah Naval Oil Shale Reserve (NOSR) was not eligible for wilderness review since it is a legally established special area dedicated to energy development. The NOSR was established by Presidential Executive Order dated December 6, 1916, as modified by Executive Order dated November 17, 1924. By virtue of law (10 U.S.C. 7421 [Supp. V, 1964]), the Secretary of the Navy was assigned jurisdiction and control over lands comprising the NOSR. By cooperative agreement initially dated August 8, 1935, and subsequently revised as of November 17, 1966, BLM acted as agent for the Navy in administration of livestock grazing and various other surface uses on those portions of the reserve outside the Uintah-Ouray Indian Reservation. The BLM activities were subject always to the primary purpose of the withdrawal and subject to certain authorization or concurrences from the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

Secretary of the Navy. On October 1, 1977, jurisdiction of the NOSR was transferred from the Secretary of the Navy to the Department of Energy (DOE), pursuant to the Department of Energy Organizational Act (P.L. 95-91). BLM continues to manage certain surface resources under agreement with DOE, subject always to continued recognition of the primary purpose of the reserve for future energy development and to DOE requirements.

**66.6 COMMENT:** The Sand Wash area should be added to the Desolation Canyon WSA. [Sierra Club, Cache Group and Utah Wilderness Coalition]

a. Above Sand Wash, where boaters put in and take out, 11 more miles of wild natural river flow. This is an area we call Nutters Hole and was called Sand Wash (UT-080-605) by BLM. By the end of the wilderness inventory including Secretary Watts deletions, not one acre of wilderness was under study in the Vernal District of BLM. Nutters Hole was also a victim. In the inventory BLM dropped parts of the area because of mineral potential. This violates the Wilderness Inventory Policy. Oil and gas were seen to have potential; the area abuts a producing field. In the initial inventory BLM dropped 27,560 acres at Sand Wash. The "roads" BLM claims are a total of 10 miles of vehicle ways on the ridges east of the river. Field checks by our volunteers found the following. They are passable simply because no road is needed to drive on the smooth ridges east of the river. There is no evidence of any road construction or maintenance for more than 10 years. The vehicle ways are two-wheel tracks with mature shrubs growing between them. Use is very infrequent and for no established need. They are not significant impacts in themselves and occupy a total area of 8 acres. The fence and oil facilities do exist right at the northeastern edge of the original roadless area. We recommend that the boundary be brought in a 0.25 mile to exclude those impacts. BLM used these impacts to justify dropping thousands of acres. Let's assume BLM was right about these impacts and they are significant. In that case the inventory policy requires BLM to redraw the boundary to retain natural areas and exclude only impacted areas. BLM moved the boundary between 2 and 5 miles west of the last human impact. The reason was that they believed that there was potential for oil and gas development on the east side of the river. BLM was not allowed to drop candidate areas because of mineral potential and instead they falsified the analysis of the naturalness of the area.

b. In the intensive inventory, BLM dropped the rest (19,503 acres) of the Sand Wash area and the arguments are illogical. First, the area is so rugged that it is easy for one person to be secluded from another. Next, part of the area offers that expanse of natural land where solitude is paramount. In both cases, IBLA found that BLM failed to correctly interpret the definition of solitude. It is hard to believe that in such a large area with dozens of side canyons, one cannot have solitude. BLM ignored the river recreation experiences which are of regional importance and clearly outstanding. River runners regularly float this section of the river. BLM also ignored the hunting of antelope and deer in the area. Because this area is a critical part of the waterfowl fly way, the river banks offer some of the best bird watching in the region. The river and canyons are highly scenic and offer outstanding opportunities for photography. BLM ignored the presence of numerous unique and threatened plant communities and their importance to wilderness. The wild and scenic river inventory was also ignored in their inventory. Lastly, BLM fragmented the area into small parts along lines that made no sense to the visitor. Why was the right side of the natural river dropped in the initial inventory? Why was the area separated from Desolation Canyon, a contiguous BLM roadless area? BLM clearly violated the inventory process by not considering the wilderness activities tied to supplemental values. BLM totally ignored the presence of the Green River in the wilderness inventory.

c. BLM's proposal deletes the first 16 miles of the popular Green River/Desolation Canyon river trip route (as starting from Sand Wash). The rationale for removing this outstanding river area is difficult to derive from the EIS.

**66.6 RESPONSE:** Portions of the Green River (upstream and downstream from the WSA) are not within a WSA because they did not meet the inventory criteria. Hunting and river running are not essential wilderness criteria; and conversely, wilderness designation is not essential for these activities to continue. The inventory phase is completed, as noted in the response to General Comment 3.1.

**66.7 COMMENT:** This BLM tract should be included as a part of a Desolation Canyon wilderness area complex as proposed by the Utah Wilderness Coalition. This entire WSA must be protected through the "All Wilderness Alternative". [Sierra Club, Cache Group]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

**66.7 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**66.8 COMMENT:** We support and commend the recommendation that Desolation and Turtle Canyons be included in the wilderness preservation system, but we feel that BLM's recommendation should include the entire original wilderness study area acreage, and include the head of Rock Creek Canyon. Desolation Canyon accounts for about a third of all the recreational use in areas studied by BLM for wilderness. It is the single most important area for wildlife habitat capacity and for diversity. The acreage dropped by BLM is no less deserving of protection than those areas recommended. There just are no urgent or compelling reasons to exclude them. [Uintah Mountain Club]

**66.8 RESPONSE:** The rationale for BLM Proposed Action is summarized in Appendix 11 of the Final EIS.

**66.9 COMMENT:** The East Central Region, Desolation Canyon and the Book Cliffs WSAs (Floy, Coal, Spruce, and Flume Canyons) provide excellent sylvian hiking/backpacking opportunities, combined with opportunities to view deer, elk, and bear. Popularity of this region would increase if a reasonable set of hiking trails was established. We recommend that the entire WSA complex be retained as wilderness, with well defined trailheads and hiking trails to provide visitors with a unique forest wilderness experience. [Wasatch Mountain Club]

**66.9 RESPONSE:** The EIS notes the outstanding opportunities for hiking/backpacking and other primitive and dispersed recreation. Additional hiking trails and defined trailheads would be considered in wilderness management plans following wilderness designation.

**66.10 COMMENT:** Three areas need to be added. Facilia Mesa (spelled phonetically), where all the oil and gas wells have turned up dry; Little Park Wash, where 15,000 acres have been excluded, although conflict only affects 2,900 acres in Cedar Ridge; and Jack Canyon. All these areas have been eliminated due to insufficient mineral conflict. BLM should not be making mineral determinations based on current speculative data. We cannot jeopardize renewable resources as wild lands have to offer for the exploitation of nonrenewable resources. Bear in mind that these areas are not only for our enjoyment, but critical for wildlife and plant life. [Mike Nickas]

**66.10 RESPONSE:** No location by the name of Facilia Mesa is known within the WSA based on USGS map data and staff knowledge. Minerals information is not considered to be "speculative." Some production of oil and gas is occurring from wells in and adjacent to the WSA. Coal resources are known to exist. The EIS presents information on various resources, including minerals, wildlife, and wilderness values. Data in BLM records do not support the comments conclusion that all wells drilled in the areas "turned up dry." The majority of wells drilled in the vicinity of Desolation Canyon have had significant oil and/or gas shows in a variety of formations. In addition, several of the wells drilled along the borders of the WSA have discovered commercial reservoirs of oil and gas, which in some instances extend directly underneath the WSA.

The BLM mineral determinations are based on more than speculative data. BLM has well records of all wells drilled on Federal lands. Also, BLM has innumerable publications dealing with regional and local geologic characteristics, published by leading experts in industry, government, and academia. In some instances BLM geologists have been allowed to review and analyze confidential geologic data assembled by industry in the form of geophysical and well data.

**66.11 COMMENT:** Within the context of the Desolation Canyon WSA, I wish to comment on the peculiar inclusion of the upper reach of Rock Creek in the Partial Wilderness Alternative (Preferred), while this area is absent from the WSA description in all other alternatives. Upper Rock Creek clearly meets wilderness criteria and should have been included in and recommended for wilderness designation in all alternatives (except, of course, the obligatory No Wilderness Alternative). There is an old road cut from an active cattle camp (house and bunkhouse) on private land on the northern side of Rock Creek Canyon which descends to meet the creek bottom near the head of the canyon a short distance below where BLM land starts. However, the road has disappeared along much of its length. The central section of this old road is in a deep cut on the side of the canyon which will not rehabilitate by natural means for centuries. However, the steepness and angle of the canyon wall through this portion, and the fact the road is near the top of the canyon wall, makes it invisible from any possible hiking route in the canyon except the road itself (which has already turned itself into a very nice hiking trail giving access to the head of the canyon). Thus, this old road does not represent a

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

substantially noticeable human intrusion affecting the naturalness of the area, but rather adds a hiking route to the area. [Richard Christie]

**66.11 RESPONSE:** The proposed addition of 840 acres in Upper Rock Creek was identified after the inventory and prior to the issuance of the Draft EIS to improve management. In the Final EIS, it has been included as part of the All Wilderness and each of the Partial Wilderness Alternatives, rather than in only one Partial Wilderness Alternative as in the Draft EIS.

**66.12 COMMENT:** The 430-acre exclusion at the head of right hand Tusher Wash is particularly distressing. The exclusion would deny protection to the area, which, because of its gentle relief, numerous springs, greater vegetative variety, and high elevation are some of the most important acres in the Rattlesnake Canyon drainage. I personally have seen trophy deer, elk, and black bear all within the Nutters Hole area. It is a very heavily used area by wildlife, and if development pushes out of Tusher Wash onto the ridge top, it will be ruined. [Slickrock Outdoor Society]

**66.12 RESPONSE:** The upper reaches of Rattlesnake Canyon and the Right Fork of Tusher Canyon are valuable for wildlife. The area is used by big game species and includes aspen communities which support a high density and diversity of nongame birds. Wildlife may be considered a supplemental wilderness value, but it is not one of the primary criteria for wilderness suitability. Wildlife values may be fully managed through BLM land use plans. Nevertheless, after reviewing the relationship of Nutters Hole to potential oil or gas reservoirs, BLM has determined that resources in this area could be possibly be extracted from adjacent lands and the areas have been included in BLM's proposed Partial Wilderness Alternative.

**66.13 COMMENT:** One general problem that exists in the Draft EIS "Manageability" Alternative is that this alternative should include the All Wilderness Alternative for Desolation Canyon. There might be some problem with pre-FLPMA leases near Jack Creek, but the rest of the WSA does not contain any existing rights that would conflict with wilderness designation. Perhaps a new alternative could be developed for Desolation Canyon that excludes only lands with valid-rights conflicts. [Utah Wilderness Association]

**66.13 RESPONSE:** The Statewide Manageability Alternative has been deleted from detailed analysis in the Final EIS.

**66.14 COMMENT:** There is considerable doubt and controversy surrounding the potential oil and gas resources within the WSA, particularly along the southern boundary (Suluar Mesa area). Even the mineral industry claims insufficient data has been used in current decision. This can be rectified, to the greatest extent possible, by including the entire WSA in the "suitable" recommendation so that the area can receive the more extensive GS/BM studies. The areas in question will be controversial throughout the wilderness designation process and those making the decisions, be they the Secretary, President, or Congress, should have the best information available when making a decision. The public also deserves to have such information available in deciding if we think the area should be designated wilderness. An all wilderness recommendation at this stage in the process does not require any change in management of the areas in question, however, it is the only way the additional information will be gathered by GS/BM. If the GS/BM reports indicate that significant mineral resources exist BLM can find the lands unsuitable at that point and the information will be available to all decision-makers throughout the designation process. Sound decision-making dictates this approach. [Utah Wilderness Association]

**66.14 RESPONSE:** BLM believes that wilderness, wildlife, recreation, and mineral potential are all important resources in the Desolation Canyon WSA (and other Book Cliffs WSAs). The BLM Proposed Action in the Final EIS provides for a balance among these important uses. BLM has suggested that GS/BM provide information on all the Book Cliffs WSA acreage; however it is unlikely that GS/BM will have the capability to fully study the entire Bookcliffs area prior to the 1981 wilderness reporting deadline.

**66.15 COMMENT:** A pipeline, actually a 4-inch pipe, laid on top of the ground and causing no surface disturbance is used as the boundary between the Jack and Desolation Canyon WSAs. BLM admits the pipe could be removed when no longer needed without causing surface disturbance and leaving no indication it ever existed. Indeed, unless you are standing right over or immediately adjacent to the pipe, it cannot be seen from either WSA. It is very important this "separation" be rectified before making final judgement on the Jack Canyon WSA, since standing alone the Jack

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

Canyon area may not be a viable wilderness candidate. But when you consider it constitutes half the length of one of Desolation Canyon's major drainages, its importance becomes readily apparent. [Utah Wilderness Association]

**66.15 RESPONSE:** See the response to Specific Comment 65.3.

**66.16 COMMENT:** The Desolation and Floy Canyon WSAs should be joined by closure of the road in the Right Hand Fork of Tusher Canyon. [Utah Wilderness Association]

a. The boundary between Desolation and Floy Canyon WSAs is Right Hand Tusher Canyon. At the time of the inventory, a jeep trail existed part of the way up Right Hand Tusher Canyon. In 1981, BLM allowed Tenneco to upgrade the jeep trail and build several miles of new road to the head of Tusher Canyon, where they drilled a well. The well is shutin and as of spring 1985, the road was no longer passable a couple of miles beyond the forks of Tusher Canyon. Most of the road was built in the wash bottom and has been obliterated by spring runoff. The lease, which the shutin well is holding, will expire soon and should be followed by road reclamation, if necessary. The two units should be recombined for analysis in the Final EIS.

b. Four deletions are particularly troubling and insupportable and should be reversed. The exclusion of 430 acres at the head of Right Hand Tusher Canyon and Rattlesnake Canyon is simply insupportable. For 5 years we have tried to convince BLM of the importance and potential disastrous impact of this exclusion, only to be ignored. You only need to look at a map with the proposed deletion surrounded by Desolation Canyon, Floy Canyon, and Indian land wilderness to see the absurdity of this pocket of nonwilderness. You only need to sit watching a black bear drink from a spring near the head of Rattlesnake Canyon within the "exclusion," to see how absurd and damaging this exclusion could be. There can be no doubt that oil and gas development in this area could significantly impact the surrounding wilderness and could not be conducted without causing severe environmental damage in this steep and rugged terrain. What is especially troubling about the exclusion is that the oil and gas resource is absolutely unimportant to the public and the industry. The well was drilled and shutin 5 years ago and to this day has not produced one bit of energy. By the time the Final EIS is released, the lease

that is being held by the shutin well will most likely have expired. As of May 1985, the route to the well site was impassible just beyond the forks of Right Hand and Left Hand Tusher Canyons. It should be allowed to reclaim, with a little help from the company in compliance with the APD and IMP requirements, and the Floy Canyon and Desolation Canyon WSAs should be rejoined.

**66.16 RESPONSE:** See the response to General Comment 3.1. The road in the Right Hand Fork of Tusher Canyon is periodically maintained and is currently passable up to the well site of the head of the canyon. Also, see the response to Specific Comment 66.12 relative to the 430 acres at the head of the canyon.

**66.17 COMMENT:** BLM has ignored the presence of roads and their importance to livestock operators. [Utah Cattlemen's Association and Steve and Joel Stamatakis]

a. A lot of the roads are left off that link ranches in that area, are used for water development, and are very crucial to some of the operations. Some other things were left out, like our Rock Creek Ranch on the Green River. That is 160 acres of private ground. That never even showed up in the report.

b. A major flaw in the Draft EIS is its failure to recognize existing roads within the following permits: Elliot Mountain, Pack Trail River, and Big Horn Benches. The river permit has numerous roads that have not been considered. These roads are essential for ranchers to build stock ponds, pulling their camp wagons, salting and maintaining their livestock, and in addition, rangeland improvements such as reseeding, spraying, and chaining will be essential for the future of the rancher. Due to the shortage of water on all these permits, development of stock ponds, tanks and springs is a great necessity for livestock, as well as the wildlife in this area. Due to the fact that these areas have great potential for natural resources, for ranchers as well as recreation, why put it in a wilderness area?

**66.17 RESPONSE:** All vehicle access routes which meet the official definition of a "road" have been omitted from the WSA during the inventory process, by boundary selection and/or cherry-stemming. Vehicle routes such as jeep trails do not qualify as roads, but are addressed in the EIS as "ways." As explained in Appendix 1, livestock operators would be permitted

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

to use vehicles, if needed on an occasional basis, within designated wilderness areas. Roads have not been identified within the allotments mentioned that are within the WSA, with the exception of the vehicle route onto the Beckwith Plateau. This vehicle way has been cherry-stemmed from the WSA. There is also a vehicle way extending south into Little Park Wash which is used by ranchers. With these two exceptions, vehicle use within the WSA (for livestock grazing) in these areas is not known.

The effects of designation on potential range projects are evaluated in the EIS. Due to site characteristics, BLM has not proposed reseeding, spraying, or chainings for any of these allotments. The map has been corrected to show the private land at Rock Creek. Also, see the response to General Comment 1.1.

**66.18 COMMENT:** What will happen to our private grounds bordering wilderness areas. [Utah Cattle-men's Association]

**66.18 RESPONSE:** See the responses to General Comments 3.35 and 7.1.

**66.19 COMMENT:** The BLM deleted six very popular canyons around Peters Point and Suluar Mesa for mineral development potential. We feel that the wilderness qualities of solitude, primitive recreation and naturalness far outweigh any mineral development for these pristine canyons. [Sierra Club, Cache Group]

**66.19 RESPONSE:** The views expressed are noted. The rationale for the BLM Proposed Action is summarized in Appendix 11. Also, see the response to Specific Comment 26.51.

**66.20 COMMENT:** The Draft EIS recommends that only 23,140 acres of the 72,605-acre Floy Canyon WSA be designated as wilderness. The entire area deserves to be designated. It is the crucial link between the huge Desolation complex on the west side of the Book Cliffs complex and the huge south Book Cliffs complex of the Coal Canyon, Flume Canyon, and Spruce Canyon WSAs. This canyon and its adjoining WSA neighbors, make up what is probably the largest, most remote and most wild area in the entire State. The area provides habitat for "Mule deer, elk, bear, cougar, coyote, bobcat, blue grouse, ruffed grouse, chukar, and numerous species of raptors, songbirds, small mammals, reptiles, and amphibians

... " according to the Draft EIS. Many of these species are extremely sensitive to the presence of human intrusions. This area is very remote and almost completely untouched. According to the Draft EIS: "A complete inventory for historic or prehistoric values in the WSA does not exist . . . It is estimated that an excess of 60 sites could be in the WSA, with 30 of these having National Register potential . . ." (page 20). The fact of the matter is that this area is so wild that the BLM does not even know what is in it! "The deeply incised, branching drainages within the WSA allow dispersion of recreational use and provide for outstanding solitude." (page 22) This area is "clearly and obviously" wilderness. I strongly urge you to reconsider your recommendations for this entire area and hope to see a recommendation for a 457,800-acre Desolation Canyon complex/Floy Canyon wilderness in the Final EIS. [Scott Delong]

**66.20 RESPONSE:** The various resources of the Desolation Canyon/Floy Canyon WSAs have been identified in the EIS and considered by BLM. Also, see the responses to General Comment 3.29 and Specific Comment 66.16.

**66.21 COMMENT:** The dropping of Book Cliffs has been purely political to this point because of some local opposition perhaps, but Congress is the place for politics, not in BLM. BLM should find all the WSAs and Desolation Canyon as suitable and have the GS/BM reports completed. They have the most outstanding wilderness values in the State of Utah, and they have already shown they are very valuable for that use. [George Nickas]

**66.21 RESPONSE:** BLM's Proposed Action for wilderness designation includes several of the Desolation Canyon-Book Cliffs WSAs. They have been revised in the Final EIS as follows.

Jack Canyon	No Change-No Action/No Wilderness
Desolation Canyon	Decrease 46,560 acres
Turtle Canyon	Decrease 5,730 acres
Floy Canyon	No Change-Partial Wilderness
Coal Canyon	Increase 20,774 acres
Spruce Canyon	Increase 14,736 acres
Flume Canyon	Increase 16,495 acres

Also, see the responses to Specific Comments 66.14 and 66.19.

**66.22 COMMENT:** The Desolation should be expanded past the southern confluence with the Price River on the east side of the Green River. The southern portion of Floy Canyon should also be recommended

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 66: DESOLATION CANYON WSA (CONTINUED)

wilderness. The Desolation/Floy/Coal/Spruce/Flume Canyons along with the State roadless area and the Hill Creek extension could compromise the largest and best BLM wilderness in the State and could be renamed the Book Cliff-Desolation Wilderness. [D. Kennell]

**66.22 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**66.23 COMMENT:** The decision to exclude the Peters Point KGS and surrounding lands has eliminated nearly the entire Jack Creek drainage from the wilderness proposal. This area is characterized by an expansive 1,000-foot deep canyon system with unequivocal wilderness values. The imprints associated with oil and gas activity have been confined, almost in their entirety, to the higher country west of the WSA. At the mouth of Jack Creek Canyon is an extensively used river camp. The canyon provides outstanding hiking, hunting, and exploring opportunities for those running the river. Jack Canyon provides excellent river access to those using the high country for horsepacking and backpacking. Unfortunately, a road was illegally bladed into Jack Creek for access to a drill site. The well is now a producer and the site and road would have to be "cherry-stemmed" from the wilderness proposal. This would undoubtedly detract from a visitor's wilderness experience, but not in the upper or lower reaches of the canyon. [Utah Wilderness Association]

**66.23 RESPONSE:** River recreationists using the Green River occasionally make a side-trip up the Jack Creek Canyon for hiking, exploring, and possibly hunting. The use is very light and mostly occurs in the lower 2 miles of the canyon.

The majority of the oil and gas development to date has occurred outside of the WSA. The road to the well site was not constructed illegally, but was allowed as a valid existing right. It does detract from the wilderness characteristics in the immediate vicinity, and will continue to do so as long as the well is in production. The evidence of producing wells supports the BLM position that mineral values should be given precedent in the Peters Point area. Also, see the response to General Comment 5.1 concerning IMP actions.

**66.24 COMMENT:** While some of the deletions may be warranted because of major mineral deposits of proven commercial value, the wilderness values lost are not reported in the Draft EIS in a measurable man-

ner. BLM does not comprehensively report the loss of critical wildlife ranges, wilderness opportunities, wilderness economic benefits, or other wilderness values in the Draft EIS for this area. It is not possible to weigh the decision to make those deletions until the loss of wilderness values is matched against the benefits from the minerals. [Utah Wilderness Coalition]

**66.24 RESPONSE:** For each alternative, the impacts on wilderness values and other significant resources are narrated in the EIS. The common measurable unit for wilderness values is given in acres having such values. The intrinsic values such as naturalness, outstanding solitude, and opportunities for primitive recreation cannot be directly compared to tons of mineral production or economic potentials. Also, see the response to General Comment 3.3.

**66.25 COMMENT:** This WSA contains numerous arches, a 1-mile deep canyon and other unique and natural geological features that deserve wilderness protection as proposed by the Utah Wilderness Coalition. [Sierra Club, Cache Group]

**66.25 RESPONSE:** It is true that the WSA includes arches, a 1-mile deep canyon, rock pinnacles, and other features of geological interest. These features are described in the Final EIS.

**66.26 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**66.26 RESPONSE:** A statement has been included in the Final EIS concerning these resources.

**66.27 COMMENT:** Page 21, Table 1: The soil loss figures (due to development) are apparently wrong. Soil loss on the 143,350-acre partial is 6.4 percent, while no action is only 6 percent. [State of Utah]

**66.27 RESPONSE:** The surface disturbance and soil loss estimates in the Final EIS have been revised and recalculated.

**66.28 COMMENT:** The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions. Future mineral production could be hindered by regulation of water



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation. [Emery County]

**66.28 RESPONSE:** See the response to Specific Comment 59.21. The mainstream of the Green River passes through the WSA. For several reasons, including the requirements of the Colorado River Compact and the presence of Canyonlands National Park downstream of the WSA, it is likely that sufficient water for wilderness purposes would flow through the WSA without additional encumbrances. For further explanation, see the response to Specific Comment 66.33.

**66.29 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. Accordingly, I submit to you with this statement, a copy of our resolution numbered 4-17-86 concerning Federal reserve water rights. [Emery County]

**66.29 RESPONSE:** The resolution is contained in the Final EIS in Volume VII, Part A.

**66.30 COMMENT:** Being that the San Rafael and the tributaries to the San Rafael are major contributors to the Colorado River salinity problem, we are concerned with what measures might be taken if downstream areas are designated wilderness. [Emery County]

**66.30 RESPONSE:** Additional information on salinity is included in the Final EIS.

**66.31 COMMENT:** We feel that sediment load from even modest road construction and site preparation would result in unacceptable degradation of water quality in the Book Cliffs WSAs. Continued activities on-site, especially with ongoing mining activities or the establishment of oil and gas "fields" would likely cause continued erosion in this up-and-down canyon country. In the canyons with perennial streams, beaver dams--nature's own "instream drop structures"--would certainly be affected. Don't meddle. If there is to be soil loss, let it be under the All Wilderness Alternative. [Uintah Mountain Club]

**66.31 RESPONSE:** Beavers can have both positive and negative impacts on riparian areas. While they do construct natural instream structures, they also may deprive a stream segment of needed trees (for shade

and other habitat). The role and function of beavers would not be affected with slight and temporary increases in sediment from small construction projects. Also, see the response to General Comment 14.21.

**66.32 COMMENT:** We can never lose sight of the value water has to wilderness; it simply makes no sense to dewater a wilderness area, thereby destroying the natural values--wildlife, fish, and riparian habitat--the wilderness was designated to protect. All avenues must be pursued to assure there will be adequate water to preserve wilderness values within these areas. Since wilderness is nonconsumptive of water, it assures downstream users of a constant supply. The inventory of major surface water supplies within or bordering WSAs (Table 24, Vol., p. 66) should be upgraded. Some of the major water supplies missing from the list are Rock Creek and Flat Creek in Desolation Canyon, Indian Farm Creek in the Deep Creek Mountains, and the Little Dolores in Westwater Canyon. [Utah Wilderness Association]

**66.32 RESPONSE:** These streams mentioned, including Rock Creek and Flat Creek in the Desolation Canyon WSA, have been added to Table 37 in Volume I of the Final EIS.

**66.33 COMMENT:** UP&L has pending water rights on the Green River equal to 4,355,000 acre-feet of storage and 29,500 cfs of direct flow. UP&L filed its water applications in these WSAs prior to the time that they were being studied for wilderness designation, in conjunction with its plans for developing steam electric generating plants near Green River and Wellington, Utah. [Utah Power and Light]

**66.33 RESPONSE:** The locations mentioned in the comment are downstream of the WSA and would not be affected by wilderness designation. In addition, BLM expects that wilderness designation would have little or no affect on Green River water, due to the existing water rights and other existing limitations.

The Green River is a major tributary to the Colorado River. It is part of the upper basin under the Colorado River Compact, and it originates in Wyoming and flows south into Colorado and through Utah to its confluence with the Colorado River in southeastern Utah. The river flows in Utah have been highly regulated since the late 1960s by storage and releases from Flaming Gorge Dam (a Bureau of Reclamation hydroelectric project).

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 66: DESOLATION CANYON WSA (CONTINUED)

Upstream of Desolation Canyon, the uses of the river include many existing diversions for consumptive uses, storage, instream use for power production, sport fishing, and recreation (including individual and commercial rafting). Also upstream, the Uintah and Ouray Indian Reservation (Ute Tribe) has decreed water rights and currently undefined water rights granted by the Winters Doctrine. Quantification of these tribal rights have been in process for many years and still is unresolved.

Within Desolation Canyon, the river primarily supports recreation use, with about 60,000 annual visitors participating in individual and commercial rafting.

Downstream from Desolation Canyon, there are limited diversions and additional recreation uses. Currently, the Green River contributes substantial flows to subsequent downstream uses of the Colorado River.

For the upper basin States to utilize their water entitlements specified in the Colorado River Compact, various projects have been, and in the future may be, proposed to divert flows from the Green River and its tributaries upstream from Desolation Canyon. This is a significant activity based on long-standing compact provisions; and in Utah, for example, it includes major Federal funding of "out-of-basin water transfers" as part of the Central Utah Project. With this effort, future flows in the Desolation Canyon portion of the Green River may be reduced (at least on a seasonal basis), with the use of existing water rights agreements and water management programs. The Final EIS includes additional information on the Colorado River Compact, water rights, and water uses.

If the Desolation Canyon area is designated wilderness, the riverine values (including the river-oriented recreation, the riparian conditions, and the several threatened and endangered fishes [Colorado squawfish, razorback sucker, and humpback chub]) would continue. Due to the Endangered Species Act, limitations or special conservation measures for water projects already are required where Federal lands or permits are necessary. Regardless of wilderness considerations, minimum flow requirements already are an important aspect of endangered fish protection and Colorado River system operation (i.e., Flaming Gorge, Glen Canyon, and Hoover Dam). Instream flows for endangered fish protection likely would fully serve wilderness ecological needs.

Average annual flow of the Green River in Desolation Canyon is about 3.9 million acre-feet. Utah's annual allotment for diversion under the Colorado River Compact is about 1.7 million acre-feet (UDNR, 1980). Current annual water use in Utah is less than one million acre-feet, although many additional water filings exist (including those noted in the comment). Entitlements of the Ute Indians, Colorado, and Wyoming would add to this use. Wilderness designation would not alter the Colorado River Compact or the existing water use entitlements and water rights. Also, it would not alter flow releases from Flaming Gorge.

**66.34 COMMENT:** A Federal hydroelectric power generation withdrawal exists in the canyon on the Green River side. However, development of a water storage and hydroelectric project presents obstacles. Primary among these obstacles is the presence of endangered fish species throughout the canyon. Another obstacle is the recreation and the historic significance of the river gorge itself. The Green River is being considered for Wild and Scenic River study, and a portion is already protected as a historic landmark. There may be potential conflicts with development of the deep aquifer. Overall, this WSA has conflicts with other resources values while it also has high-quality wilderness values. The 143,350-acre Partial Wilderness Alternative possibly minimizes the more serious conflicts. [State of Utah]

**66.34 RESPONSE:** The EIS reflects the presence of a powersite withdrawal. It also notes the endangered fish, the recreational use, and the Wild and Scenic River Inventory status. Also, the EIS indicates that future construction of a dam in Desolation Canyon is unlikely and it is not predicted in the foreseeable future.

**66.35 COMMENT:** BLM correctly found that no legal authority prevented wilderness management within the WSA. Management of mining claims and mineral leases is possible in wilderness areas without impairing wilderness values. Recent legal decisions and the Wilderness Management Policy firmly have established this. [Utah Wilderness Coalition]

**66.35 RESPONSE:** Management of existing mining claims and mineral leases in WSAs and in designated wilderness areas must be handled on a case-by-case basis. Sometimes the legal requirements (pre-existing rights) and the nature of the actions are such that wilderness values may be impaired; other times, the

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

situation may allow both activities to co-exist without significant or long-term impairment to wilderness values. Also, see the response to General Comment 1.13.

**66.36 COMMENT:** The area controlled by Kaiser extends northwest to southeast for approximately 26 miles, roughly following the line of the Book Cliffs (specifically, from T. 13 S., R. 13 E. to T. 17 S., R. 15 E.). These holdings extend from the valley floor on the west and up to 8 miles west-to-east. The mining method used in the working mines and planned for future mines is underground longwall mining. BLM estimates there are approximately 230 million tons of recoverable coal on Kaiser's property, and production in 1986 will be over 1.8 million clean tons. The Kaiser reserves constitute the vast majority of the metallurgical grade coking coal in the State of Utah. The area of most concern in this study is the so-called South Lease area, which is actually comprised of several Federal and State leases. Although the depth of cover over the mineable seams increases from west to east, the seams themselves are continuous and there is probably significant high-quality, low sulfur recoverable coal to the east of the current leases, beneath the area contained in the Turtle Canyon WSA. The 1982 SAI study, used in the Draft EIS, assumes 27 million tons of recoverable coal in this area. To the south of Kaiser's property, there are additional reserves contiguous to Kaiser's existing identified reserves and beneath portions of the Desolation Canyon WSA (SAI, 1982). [Kaiser Coal]

**66.36 RESPONSE:** The comment is consistent with information presented in the EIS.

**66.37 COMMENT:** This WSA is directly adjacent to the south boundary of Kaiser's Federal coal lease U-0126948. All of the comments regarding the potential for lost coal resources discussed for Turtle Canyon pertain to the Desolation Canyon WSA as well. The southwestern portion of the WSA overlies significant potential coal reserves, with one major difference being that since these reserves are on the outcrop, they would be more likely to attract competitive bidding as a stand-alone mining tract. Certainly Kaiser might be interested in these reserves in the future, if further study demonstrated sufficient quality and mineability. The proposed alternative (partial (242,000) acreage) would eliminate from wilderness consideration the portion of the WSA that directly adjoins Kaiser's lease. That is obviously better than the all wilderness

option in terms of the coal resource conflicts. [Kaiser Coal]

**66.37 RESPONSE:** It is intended that BLM's proposed Partial Wilderness Alternative will minimize conflicts between the various land uses and identify significant areas for wilderness designation.

**66.38 COMMENT:** The oil and gas potential of Suluar Mesa and Tusher Canyon has been overstated. [Utah Wilderness Association and Slickrock Outdoor Society]

a. Certainly the Suluar Mesa area does not meet the criteria of strong potential for mineral and energy resources. Several wells have been drilled in the vicinity of right and left hand Tusher Washes as well as in the Butler Canyon area and even within the WSA on the shoulder of left hand Tusher Wash; none of these wells were producers. These findings greatly decrease the chances of significant gas or oil being present on Suluar Mesa. It is our view that the wilderness resources present on Suluar Mesa are too outstanding to put at risk for what little gas and oil may be there.

b. Suluar Mesa has been deleted because of potential for oil and gas. Again, this decision is insupportable by the data. In the early 1980s, several wells were drilled near the southern boundary of the WSA in Right Hand Tusher Canyon, and one well was drilled and reclaimed on the shoulder of Suluar Mesa inside the WSA. None of these wells indicated any oil and gas near Suluar Mesa. BLM should not ignore this information as it indicates there is little likelihood for oil and gas in the deleted portion. At the same time, the Draft EIS recognizes that all of Suluar Mesa contains outstanding opportunities for solitude and primitive recreation. Certainly the wilderness values outweigh what appears to be little potential for development.

**66.38 RESPONSE:** BLM data indicates that of the two wells drilled in Right Hand Tusher Canyon, one had a gas show in a Mancos sand unit and the other one had no tests run in the well. Regardless of this, the nature of the sand reservoirs found in this area and in productive areas to the east, are such that two drill holes do not represent a full test for an area this size. Other holes drilled in the area, combined with regional and local geologic conditions, indicate the area has potential to contain productive reservoirs. However, the size of these reservoirs, probably from 300 to 5,000 acres, make finding them difficult.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 66: DESOLATION CANYON WSA (CONTINUED)

**66.39 COMMENT:** We support only the cherry-stemming of the road and drill pad in the Jack Creek-Peter's Point KGS exclusion. The rest of the acres in this exclusion should be added back to the WSA. The gas and oil resources can be satisfactorily extracted from this area by development at the peripheral of the WSA and from the existing drill pad within the WSA by slant drilling techniques if necessary. We do not support the Jack Creek-Peter Point KGS exclusions. [Slickrock Outdoor Society]

**66.39 RESPONSE:** Directional drilling is not a feasible technique for all areas. It is applicable in certain circumstances, but these are a small minority of cases. There are many technical considerations involved such as depth of a target deposit and the type of rock to be drilled through. The harder the rock type (sandstone as opposed to muds) and the shallower the target, the less a well can be directionally drilled. In this area, the target depths are shallow and the rock types are hard consolidated sandstones and shales. The maximum a well could be offset would be only on the order of 200 feet. In addition, if the area is designated wilderness, new leasing would not be allowed and only areas with existing leases could be drilled and developed.

**66.40 COMMENT:** Assigning Desolation Canyon area a high importance rating for mineral and energy development when the potential of such development is rated as low to moderate is a mistake. [Pamela Quayle]

**66.40 RESPONSE:** The Final EIS addresses the feasibility of mineral and energy exploration and production in the foreseeable future. This varies in certain portions of the WSA as analyzed for each of the alternatives. In the Final EIS, the overall importance rating has been deleted, as this was found to be a confusing number which did not give managers or the public an accurate measurement of individual mineral resources known to be or thought to be present.

In addition, the potential for development must also be looked at on a mineral-by-mineral basis. For example, oil and gas has a high potential for development. Minerals cannot all be considered as a whole or an erroneous analysis would be the result.

**66.41 COMMENT:** Recent drilling activity has resulted in new field discoveries adjacent to some of the WSAs, but no mention is made of their significance in the EIS. As an example, Gulf's #1 Norris Fed-

eral (Section 8, T18S-R16E) and #1 Range Creek Federal (Section 6, T18S, R16E) wells, both new field discoveries, were reported in August 1984 and January 1983, respectively. Both discoveries are left out of the analysis for the Desolation Canyon WSA. The two wells are proximal to the boundary of the study area and both reservoir and source rocks are known to underlie the entire 289,650 acres which comprise Desolation Canyon. What is even more disturbing in this particular example is that BLM has available to it, from its own files, the necessary information with which to update SAI's mineral reports. This information includes well completion reports, sundry notices, and monthly production reports (BLM forms 3160-4, 3160-5, and 3160-6 respectively). Further, the BLM has on its "Known Geological Structures" staff, an extensive body of relevant information and geological expertise which should have been used to update the SAI reports. By doing so, BLM would have improved the accuracy of the resource assessments and ultimately the usefulness of the document. [Exxon Corporation]

**66.41 RESPONSE:** Data from these wells have been analyzed and included in the Final EIS. This analysis indicates that no adjustment of SAI's rating for oil and gas within the WSA is warranted. The data does add to the potential for oil and gas occurrence within the WSA, but does not indicate that potential fields would be of any larger size than the f3 rating specifies.

**66.42 COMMENT:** The area contains important habitat for bighorn sheep, mountain lions, bear, and the endangered peregrine falcon. The area within the UWC's proposal is very famous for excellent hunting. [Sierra Club, Cache Group]

**66.42 RESPONSE:** The EIS describes hunting activities for the Desolation Canyon WSA.

**66.43 COMMENT:** The EIS indicates that "no wildlife transplants are planned in the WSA." In fact, a bighorn sheep transplant is contemplated on the Beckwith Plateau, which is in the WSA. [State of Utah]

**66.43 RESPONSE:** Information regarding wildlife transplants have been updated in the Final EIS. The Beckwith Plateau (in the WSA) has been identified as a potential transplant site for bighorn sheep and several livestock grazing allotments have been retired in favor of the bighorn sheep.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

**66.44 COMMENT:** In the section on wildlife, the listing of economically important species omitted chukars. [State of Utah]

**66.44 RESPONSE:** Information on chukars has been added to the Final EIS.

**66.45 COMMENT:** The areas I am particularly concerned with are Jack, Desolation, Turtle, Floy, Coal, Spruce, and Bruin Canyons. BLM has looked at mineral values and considered mineral values versus wilderness values. I think probably BLM is supposing a little too much in the mineral area. Maybe I can illustrate with a case in point. The Book Cliffs area and the Desolation Canyon area are some of the most rugged and remote country in Utah. These places have wildlife: black bear, bighorn sheep, mountain lion, deer, and elk. You can grow deer most anywhere. You can grow elk in a lot of places. But, there really aren't very many places where you can get a good population of bear and lions. The only reason that they weren't recommended that I can figure out is their low to moderate potential for mineral development. Even if they had no great potential for mineral development, the potential for wildlife and wilderness experiences are greater. [J. Barnett]

**66.45 RESPONSE:** See the responses to General Comments 8.14 and 8.16. Both the wildlife and mineral values of the WSA are addressed and analyzed in the EIS. The rationale for BLM's Proposed Action are summarized in Appendix 11.

**66.46 COMMENT:** BLM is correct in finding that scenic vistas add to the presence of outstanding opportunities for solitude. Almost all of the WSA has the highest scenic quality rating allowed in the BLM visual resource management rating system. The BLM is also correct in finding that the sight of Green River seen from 1,000-foot cliffs more than 2 miles from the town does not degrade the solitude but heightens it. The contrast of development and wilderness heightens the experience. [Utah Wilderness Coalition]

**66.46 RESPONSE:** The EIS identifies that about 90 percent of the WSA is rated as Class A scenic quality.

**66.47 COMMENT:** In the section on Visual Resources, a Class V visual area is mentioned but not defined in Appendix 7. [State of Utah]

**66.47 RESPONSE:** Previously, the BLM VRM system did have a Class V. This was for disturbed areas

identified for rehabilitation. This class is no longer used, and reference to it in the text has been removed for the Final EIS. Appendix 7 in the Draft EIS was correct and has been retained unchanged in the Final EIS.

**66.48 COMMENT:** Under Cultural Resources, the size of Flat Canyon archaeological district should be indicated. [State of Utah]

**66.48 RESPONSE:** The Flat Canyon archaeological district is located at the confluence of Flat Canyon and the Green River. It is approximately 1.5 miles in length and approximately 0.5 mile wide and contains about 300 acres. The district is situated entirely within the canyons of the two drainages.

Five sites have been recorded within the boundaries of the archaeological district and additional sites may be present. Three of the sites are Fremont style petroglyph panels, all in relatively good condition. One of the panels is approximately 409 feet in length while the other two are much smaller. The remaining two sites contain masonry structures which represent granaries and a possible dwelling. One of the structures is in excellent condition, but the remaining structures have been vandalized.

**66.49 COMMENT:** One of the country's highest quality white water river areas, Desolation Canyon, has the critical large natural size to support major mammal wildlife species unable to exist in areas humans frequent. BLM has paid more attention to detailing the history, wildlife, and some of the wilderness activities in this WSA. Unfortunately, the text for wilderness activities found is generic and could in general be adapted to many areas. What is more unique in this area is the scale of the length of activities, the diversity of many within one area, and the immensity of the geography (canyons more than 1 mile deep). The analysis lacks specific detail on the degree and scope of the activities, particularly those dealing with scientific study. Inventories for endangered and threatened species appear sparse as do inventories for cultural resources. [Utah Wilderness Coalition]

**66.49 RESPONSE:** The text of the Final EIS has been expanded to further explain wilderness characteristics. Regarding resource data inventories, see the responses to General Comments 9.6, 13.8, 16.3, and 20.2.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

**66.50 COMMENT:** BLM pointed out that the best winter cross-country skiing opportunities are found in Little Park, the portion of the unit that BLM is deleting from wilderness recommendation. [Utah Wilderness Coalition]

**66.50 RESPONSE:** Little Park and Cedar Ridge are the portions of the WSA best suited for cross-country skiing. This is due to terrain, access, and adequate snow cover during winter months. Winter cross-country skiing is not dependent on wilderness designation and is not a criteria for wilderness suitability.

**66.51 COMMENT:** Desolation Canyon provides exciting and outstanding primitive recreational opportunities for those who float boat the nearby river system. Wilderness designation will enhance their trips and provide lasting protection. [Sierra Club, Cache Group]

**66.51 RESPONSE:** The comment is consistent with information presented in the EIS.

**66.52 COMMENT:** You couch the benefits of recreation in economic terms, not in the intangible and non-commercial values these areas will provide to a growing and hurried population. These contiguous roadless areas, Coal, Spruce, and Flume Canyons, are in close proximity to Interstate 70, making them an ideal destination from many places in Colorado and Utah. A large wilderness area would afford an attractive, convenient, and fascinating backcountry experience for cross-country travelers. With Desolation and Floy Canyon, this roadless area balances the geographic distribution of BLM and other wilderness in Utah. [Uintah Mountain Club]

**66.52 RESPONSE:** It is correct that large or contiguous wilderness areas facilitate extended visits. See General Comment Responses 3.13 and 3.29. The benefits of recreation are couched in economic terms in the Socioeconomics sections. The "intangible" benefits of recreation are discussed in the Recreation and Wilderness Values sections.

**66.53 COMMENT:** The document indicates that keys to the gates on the Range Creek road are available from the private owner of those lands. This is not the case; access is definitely not encouraged or available to the "casual user." [State of Utah]

**66.53 RESPONSE:** The description of public access in the Range Creek area has been revised for the Final EIS.

**66.54 COMMENT:** There is absolutely no question that this entire area is wilderness. It is remote; it contains many "special features" such as wildlife habitat, Indian ruins and petroglyphs, historic "old west" cabins; it is incredibly scenic; and it is world famous for its abundance of recreational opportunities. Much of this area is adjacent to the Green River. Desolation and Gray Canyons on the Green River are famous for their whitewater rapids and surrounding wilderness areas. This area is a huge economic drawing card for the State of Utah and deserves to be preserved for the benefit of future generations. All of the Turtle Canyon WSA is recommended for wilderness designation in the Draft EIS. Congratulations! I agree with you entirely. This area is completely natural, completely beautiful, and an integral part of the Book Cliffs roadless unit. Large sections of the Desolation Canyon WSA and Jack Canyon WSA have been dropped by the Draft EIS recommendations. These drops are entirely unreasonable. Once again your agency is willing to destroy a precious commodity (wilderness) in order to possibly dig a few minerals out of the ground. This is one of the largest intact wilderness areas in the entire State (or the entire West) and should be given higher consideration. Wilderness is a rare and precious commodity. The supply of it is always shrinking, and the demand for it is always growing. The lands that we preserve now can only become more and more valuable assets. [Scott DeLong]

**66.54 RESPONSE:** The EIS describes the various wilderness values and special features of the Desolation Canyon WSA. BLM recognizes the recreational attraction of the Green River. See the response to General Comment 8.15 and refer to Appendix 11 in Volume I of the Final EIS for a summary of rationale for BLM's Proposed Action.

**66.55 COMMENT:** Desolation Canyon WSA is the largest WSA that BLM studied and probably the most spectacular WSA in Utah. When it's added with the four Book Cliffs WSAs to the east, it accounts for an unroaded area of roughly 600,000 acres of public land. If you consider the Indian lands that are adjacent to that and a State roadless area, there are roughly 1 million acres of wilderness land in the Desolation Canyon-Book Cliff region. BLM made a good recommendation in Desolation Canyon with 242,000 acres for wilderness, but that's still short of what this should be.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

They left out three important areas in that recommendation. One of them is on the Suluar Mesa area which is north of the Turtle Canyon and south of Rattlesnake Canyon. As close as you can tell from the EIS, the reason it was left out was because of potential oil and gas development; several oil and gas wells developed along the periphery of this area. Everyone of them have been plugged and abandoned. They have not produced any oil and gas. There's no reason not to recommend this area. Another area is in Little Park Wash. BLM really doesn't identify a lot of conflicts on roughly 15,000 acres neglected, other than potentially recoverable coal in about one-fifth of that. The rest of that area BLM identifies the entire area as critical winter range for big game. The third area is Upper Jack Creek Canyon. Upper Jack Creek Canyon is a spectacular 1,000 foot deep canyon from the northern end of Desolation Canyon. In the WSA are some of the plateaus, above this canyon there is oil and gas development. [George Nickas]

**66.55 RESPONSE:** See the responses to Specific Comments 66.3 and 66.23. Data from past drill holes in the area, combined with regional and local geologic interpretations, provide adequate supportable data for this exclusion. The wells drilled at the head of Rattlesnake resulted in the discovery of a gas field in the Dakota Formation. The fact that they are shut-in reflects the costs associated with building a pipeline to them. If the company could drill more wells in the area, and additional fields are found, then a pipeline could be economically justified. Additional wells are not being drilled because of the high costs of complying with IMP guidelines. In addition, this shut-in well may hold the lease its on beyond its primary expiration date because it has been determined to be a paying well i.e., the values of gas produced would pay the costs of producing. In these determinations, BLM is not required to take into account costs of a pipeline. This is by regulation identified in 43 CFR 3160.

**66.56 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to:

1. Protect the tax base.
2. Foster agriculture and industry, including mineral reduction and processing plants, together with uses.
3. Stabilize and improve property values.

We do not feel that BLM's Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine WSAs as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possible affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986, to become a matter of record. Quoting from Section C of this plan, I conclude: "C. Open Space: In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County and accordingly, the county has adapted a zoning resolution in accordance with the earlier mentioned comprehensive plan and its accompanying statement of intent.

Further Emery County positions itself:

1. To support the highest, economically allowable development of known minerals and energy resources throughout the county.

2. To utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable.

3. To maintain at least present levels of AUMs on public lands.

4. To preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands.

Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statues.

5. To support land exchanges within the county where they can be shown to be economically beneficial to the county, and only when the county officials are provided opportunities for input in the decision process.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

6. To study intensively all areas included in the Wilderness Study Areas 023, 054, 029A, 028A, 007, 045, 068A, and 067, including drillings and other appropriate samples. While the county recognizes that there are areas in the county of critical environmental concern, not enough is known regarding subsurface minerals and resources. Under no circumstances will the county agree to any wilderness designations without a thorough analysis of all potential resource developments affected thereby. On these matters the county intends to play a role in the decision making process as provided by law. [Emery County]

**66.56 RESPONSE:** See the response to Specific Comment 59.43.

**66.57 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that even though it acknowledges the presence of the Emery County Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accordingly, and in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**66.57 RESPONSE:** See the response to Specific Comment 25.23.

**66.58 COMMENT:** Because of UP&L's responsibility to provide electricity for future growth and development in Utah, the proximity of five WSAs in the BLM Proposed Action alternative to its future steam electric generating stations is of serious concern. No future plants are located in WSAs. Should UP&L's next steam electric plant be one of those listed below, a full EIS would be required as part of the planning process. UP&L is concerned, however, that it would be precluded from building to meet future generation needs in the efficient and economical manner because of wilderness designation between and the time the plant is needed. Future steam electric generating plants may be jeopardized if additional air quality restrictions are placed on future wilderness areas. The plant sites and distances to the nearest WSAs are listed below: [Utah Power and Light]

<u>Plant Site</u>	<u>Distance/Direction</u>	<u>Nearest WSA</u>
Mounds	10 miles/east	67
East Canyon	12 miles/southeast	67
Wellington	25 miles/southeast	67

<u>Plant Site</u>	<u>Distance/Direction</u>	<u>Nearest WSA</u>
Gordon Creek	32 miles/southeast	67
Woodside	4 miles/southeast	66
Green River	10 miles/southeast	62
Westwater	5 miles/southeast	72

**66.58 RESPONSE:** See the response to Specific Comment 62.43.

**66.59 COMMENT:** The Draft EIS (Volume I) implies the proposed Rock Creek water diversion in Desolation Canyon WSA would be foregone with wilderness designation. Why? [Utah Wilderness Association]

**66.59 RESPONSE:** The proposed diversion of water from Rock Creek involves a valid existing water right and minimal impact or development. It would utilize an existing ditch and a small structure at the creek. The text of the Final EIS has been changed to indicate that this project would not be foregone.

**66.60 COMMENT:** This area now used as a wilderness area provides a significant economic basis for a long-term stable community. The more than 26 outfitters now use mostly the river trips. Hunting and horsepack outfitters need to be added with river users and other wilderness users to estimate the total annual economic base. This low impact industry provides continued support to the local people with few negative impacts. The major mineral developments offer as many or more problems and negative impacts as positive impacts in each part of the local life style. BLM has only started to estimate this enormous benefit. [Utah Wilderness Coalition]

**66.60 RESPONSE:** The existing river use and related benefits are described in the EIS. The EIS also indicates that quality use is near capacity; therefore, with the existing BLM permit system, dramatic increases in use and related economic benefit are not anticipated in the future, regardless of wilderness designation.

**66.61 COMMENT:** This area includes 60 rapids on the Green River. Over 25 river outfitting businesses depend on this area for their existence. Wilderness designation will protect these businesses and the dollars that they bring into the local and State economies. [Sierra Club, Cache Group]

**66.61 RESPONSE:** The EIS describes the recreational use of the river. Commercial river business is expected to continue, regardless of wilderness



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 66: DESOLATION CANYON WSA (CONTINUED)**

considerations. Many river trips in the Desolation Canyon presently are advertised as a wilderness experience and wilderness designation would add support to such advertising.

**66.62 COMMENT:** In Volume I, it is indicated that "Utah's mining industry now accounts for less than 3 percent of the State's total employment." In Emery County, over 50 percent of the local work force is either in mining or a utility-related position. The Draft EIS indicates that Emery County is one of six counties that could have "the greatest potential for significant impacts resulting from designation" yet the BLM Proposed Action does not appear to take this into consideration. We ask that BLM carefully weigh their recommendations and decisions as they complete their Final EIS. [Southeastern Utah Association of Local Governments]

**66.62 RESPONSE:** See the response to Specific Comment 59.47.

**66.63 COMMENT:** This is the only WSA where the BLM devoted three pages to describing the exceptional recreation in the area. The usual is one-fourth page for recreation and three pages for minerals. [Utah Wilderness Coalition]

**66.63 RESPONSE:** The size of the EIS narrative is not directly related to the significance or value of the resource but is related to the complexity of the issues involved.

**66.64 COMMENT:** In the text on Geology, paragraph 2 is very awkward and confusing. [State of Utah]

**66.64 RESPONSE:** The wording has been revised.

**66.65 COMMENT:** On Map 1: The State does not own the parts of T. 18 S., R. 19 E., secs. 21 and 22 shown as State land. [State of Utah]

**66.65 RESPONSE:** The map in the Final EIS has been revised and corrected. The status of the lands within the WSA referenced are Section 21: NE 1/4-private surface with Federal minerals; and Section 22: NW 1/4-private surface, Federal minerals. The remainder of Section 21 is Federal surface and Federal minerals. Portions of Section 22 which are in the WSA are also Federal surface and Federal minerals.

**66.66 COMMENT:** On Map 3: It would be helpful if this map identified the KGS, the National Historic Landmark, and Flat Canyon archeological district. [State of Utah]

**66.66 RESPONSE:** The locations of these features are described in the narrative. Also, see the response to Specific Comment 66.48.

**66.67 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**66.67 RESPONSE:** See the response to General Comment 14.27.

**66.68 COMMENT:** The five Book Cliffs area WSAs represent 403,660 acres (630 square miles of geologically similar terrain). They also are adjacent to the State of Utah South Book Cliffs Designated Roadless Areas of 48,490 acres in the Roan Cliffs, set aside in 1975. If the wilderness inventory had followed BLM policy, unimpacted BLM land forming a contiguous ecosystem would have lead to approximately 650,000 acres of land under wilderness study. [Utah Wilderness Coalition]

**66.68 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**66.69 COMMENT:** The benefits of designating adjacent areas should be discussed. [John Veranth]

a. In the individual WSA sections, the "size" section states areas are of sufficient size to enhance wilderness values. Why was the additional benefit of the adjacent areas not discussed?

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 66: DESOLATION CANYON WSA (CONTINUED)

b. This is a large contiguous roadless area consisting of 600,000 acres of BLM land. When adjacent State and Indian roadless lands are included, the potential roadless/wilderness area totals about a million acres. The synergistic benefits of the adjacent areas is not fully addressed in the Draft EIS. This large area would allow human impact sensitive wildlife species to spend the entire year in a roadless area since the elevation range encompasses both summer and winter range. Why was the wildlife benefit not considered in the analysis?

**66.69 RESPONSE:** See the response to Specific Comment 65.14.

**66.70 COMMENT:** Exxon believes each of these areas contain geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which lead us to this recommendation. [Exxon Corporation]

**66.70 RESPONSE:** See the response to Specific Comment 65.5. The proposed Partial Wilderness Alternative would allow for exploration and development in a portion of the WSA.

**66.71 COMMENT:** In the Desolation Canyon (WSA #66), the "Summary of Significant Environmental Consequence" identified less than 0.8 percent (2,317 acres) of the WSA wildlife habitat to be adversely impacted. However, on page 59, 9,072 acres (3 percent of WSA) in the nondesignated portion would be unuseable for wildlife due to development and human encroachment. This disparity in percent of habitat adversely impacted brings into question the accuracy of BLM assessment of adverse habitat impact on the remainder of the WSA. [Utah Wildlife Federation]

**66.71 RESPONSE:** The actual wording in the "Summary of Significant Environmental Consequences" in

the Draft EIS was that "less than 0.8 percent of the WSA could be disturbed by mineral and energy exploration and development . . ." The 9,072 acres of effect identified on page 59 added the influence of human encroachment. The disturbance estimates have been revised for the Final EIS and the direct and indirect effects have been recognized.

**66.72 COMMENT:** Also, the Desolation Canyon summary identifies a potential loss in carrying capacity of 63 bighorn sheep, 347 deer, and 48 elk as a result of winter loss. These losses represent a significant loss, but does not reflect the impact on current population levels which are far below carrying capacity. Since it is highly unlikely population levels of the above animals will not increase significantly prior to congressional wilderness recommendations, current impact on wildlife as well as impact on carrying capacity should be addressed prior to the Final EIS. This may necessitate a supplemental wildlife impact draft for public comment prior to the Final EIS. Failure to address impact of development on current wildlife populations could result in irreversible impact on existing wildlife populations. This could be especially relevant concerning the current downward trend now being experienced by desert bighorn sheep. [Utah Wildlife Federation]

**66.72 RESPONSE:** The impacts discussed in the EIS are based on activities that are projected to occur in the foreseeable future. Many of the activities may not occur for 10, 20, or more years. Therefore, it is not consistent to analyze the impacts of future activities on present populations. In addition, the situation in the Desolation Canyon WSA relative to bighorn sheep has changed. Livestock grazing in portions of the WSA has been retired in order to provide for bighorn sheep. Disturbance estimates have also been revised for the Final EIS.

## SECTION 67

### TURTLE CANYON WSA

**67.1 COMMENT:** We support and commend the recommendation that Desolation and Turtle Canyons be included in the wilderness preservation system, but we feel that BLM's recommendation should include the entire original wilderness study area acreage and include the head of Rock Creek Canyon. Desolation Canyon accounts for about a third of all the recreational use in areas studied by BLM for wilderness. It is the

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 67: TURTLE CANYON WSA (CONTINUED)

single most important area for wildlife habitat capacity and for diversity. The acreage dropped by BLM is no less deserving of protection than those areas recommended. There just are no urgent or compelling reasons to exclude them. [Uintah Mountain Club]

**67.1 RESPONSE:** In the Final EIS, the BLM Proposed Action has been changed to the Partial Wilderness Alternative for the Turtle Canyon WSA. The rationale for the Proposed Action is summarized in Appendix 11 in Volume I.

**67.2 COMMENT:** Desolation Canyon WSA is the largest WSA that BLM studied and probably the most spectacular WSA in Utah. When it's added with the four Book Cliffs WSAs to the east it accounts for an unroaded area of roughly 600,000 acres of public land. If you consider the Indian lands that are adjacent to that and a State roadless area, there are roughly 1 million acres of wilderness land in the Desolation Canyon/Book Cliffs region. BLM made a good recommendation in Desolation Canyon, with 242,000 acres for wilderness, but that's still short of what this should be. They left out three important areas in that recommendation. One of them is on the Suluar Mesa area which is north of Turtle Canyon and south of Rattle Snake Canyon. As close as you can tell from the EIS, the reason it was left out was because of potential oil and gas development, several oil and gas wells developed along the periphery of this area. Everyone of them have been plugged and abandoned. They haven't produced any oil and gas. There's no reason not to recommend this area. Another area is in Little Park Wash. BLM really doesn't identify a lot of conflicts on roughly 15,000 acres neglected, other than potentially recoverable coal in about one-fifth of that. The rest of that area, BLM identifies the entire area as critical winter range for big game. The third area is Upper Jack Creek Canyon. Upper Jack Creek Canyon is a spectacular 1,000-foot deep canyon from the northern end of Desolation Canyon. In the WSA are some of the plateaus, above this canyon there is oil and gas development. [George Nickas]

**67.2 RESPONSE:** See the response to Specific Comment 66.56.

**67.3 COMMENT:** The All Wilderness Alternative plus additional acreage should be BLM's Proposed Action. [M. Cohen and Eric Johnson]

a. BLM has recommended all of the WSA for wilderness, but the other 110 acres recommended by

UWC should be included as well. The road separating this area from Desolation Canyon ought to be removed to improve the integrity of the wilderness in the region.

b. This area should be "all wilderness" as proposed. The crime is that the area was part of Desolation Canyon until BLM illegally allowed an impassable road to be upgraded, against IMP standards.

**67.3 RESPONSE:** In the Final EIS, the BLM Proposed Action has been changed to the Partial Wilderness Alternative. The rationale for the Proposed Action is summarized in Appendix 11 in Volume I. See the response to General Comment 5.1 concerning IMP actions.

**67.4 COMMENT:** There is absolutely no question that this entire area is wilderness. It is remote; it contains many "special features" such as wildlife habitat, Indian ruins and petroglyphs, historic "old west" cabins; it is incredibly scenic; and it is world famous for its abundance of recreational opportunities. Much of this area is adjacent to the Green River. Desolation and Gray Canyons on the Green River are famous for their whitewater rapids and surrounding wilderness areas. This area is a huge economic drawing card for the State of Utah and deserves to be preserved for the benefit for future generations. All of the Turtle Canyon WSA is recommended for wilderness designation in the Draft EIS. I agree with you entirely. This area is completely natural, completely beautiful, and an integral part of the Book Cliffs roadless unit. Large sections of the Desolation Canyon WSA and Jack Canyon WSA have been dropped by the Draft EIS recommendations. These drops are entirely unreasonable. Once again your agency is willing to destroy a precious commodity (wilderness) in order to possibly dig a few minerals out of the ground. This is one of the largest intact wilderness areas in the entire State (or the entire West) and should be given higher consideration. Wilderness is a rare and precious commodity. The supply of it is always shrinking and the demand for it is always growing. The lands that we preserve now can only become more and more valuable assets. [Scott Delong]

**67.4 RESPONSE:** See the response to Specific Comment 66.54. The attributes of the Turtle Canyon WSA are described in the EIS.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 67: TURTLE CANYON WSA (CONTINUED)**

**67.5 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**67.5 RESPONSE:** A statement has been included in the Final EIS concerning the resources.

**67.6 COMMENT:** The question of air quality and water quality standards poses a potential problem to industry in Emery County by the Federal government attempting to control and protect visibility in the areas surrounding wilderness. Production costs could increase in mining operations by stricter standards on fugitive dust control and emissions. Future mineral production could be hindered by regulation of water running through wilderness areas by making water unavailable for coal cleaning, dust suppression, drinking water at site locations, and irrigation used for reclamation. [Emery County]

**67.6 RESPONSE:** See the response to Specific Comment 59.21.

**67.7 COMMENT:** In an area where water is so important, the impacts of the Kane decision in Sierra Club vs. Block cause us great concern. The availability of water will determine future growth. Accordingly, I submit to you with this statement, a copy of our resolution numbered 4-17-86 concerning Federal reserve water rights. [Emery County]

**67.7 RESPONSE:** The resolution is contained in the Final EIS in Volume VII-A.

**67.8 COMMENT:** Being that the San Rafael and the tributaries to the San Rafael are major contributors to the Colorado River salinity problem, we are concerned with what measures might be taken if downstream areas are designated wilderness. [Emery County]

**67.8 RESPONSE:** Additional information on salinity is provided in the Final EIS.

**67.9 COMMENT:** We feel that sediment load from even modest road construction and site preparation would result in unacceptable degradation of water quality in the Book Cliffs WSAs. Continued activities on-site, especially with ongoing mining activities or the establishment of oil and gas "fields," would likely cause continued erosion in this up-and-down canyon country. In the canyons with perennial streams, beaver dams--nature's own "instream drop structures"--

would certainly be affected. Don't meddle. If there is to be soil loss, let it be under the All Wilderness Alternative. [Uintah Mountain Club]

**67.9 RESPONSE:** See the response to Specific Comment 66.31.

**67.10 COMMENT:** WSAs 66 (Desolation Canyon), 67 (Turtle Canyon), and 68 (Floy Canyon): UP&L has pending water rights on the Green River equal to 4,355,000 acre-feet of storage and 29,500 cfs of direct flow. UP&L filed its water applications in these WSAs prior to the time that they were being studied for wilderness designation, in conjunction with its plans for developing steam electric generating plants near Green River and Wellington, Utah. [Utah Power and Light]

**67.10 RESPONSE:** See the response to Specific Comment 66.33.

**67.11 COMMENT:** The proposed western boundary of this WSA has been drawn to include over 700 acres of Kaiser's lease holds on two separate Federal leases, specifically U-0126947 and SL-066490. It appears the western boundary of the WSA was drawn to include a series of ridge lines, and the result is an uneven western boundary. That may be expedient when there are no competing property rights, but in the case of the Turtle Canyon WSA, the boundary overlays existing leases in a completely arbitrary manner. In addition, as the Draft EIS acknowledges, recoverable coal reserves not currently under lease underlie more of the WSA. Of the approximately 55 million tons contained in place (SAI, 1982) within about 2,360 acres, about 27 million tons would be recoverable. On page 17 the following statement appears: "The area extends up to 1 mile inside the WSA boundary and is estimated to contain 55 million tons of in-place coal, of which 27 million tons could be recovered. The mining method employed would be underground, and no surface facilities are likely to be needed or located within the WSA." This apparently innocuous and almost flippant comment is grossly misleading and tends to obscure a significant risk to this important economic resource. In addition, there is a misstatement on page 29, in the discussion of the effects of the All Wilderness Alternative, to the effect that the entire 27 million tons would be recoverable under the proposed All Wilderness Alternative. Compare this to the first line of page 6 and also the discussion on page 28, where it is acknowledged that no new leases would be issued. Therefore under the most

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 67: TURTLE CANYON WSA (CONTINUED)**

ideal conditions, only a fraction of the 27 million tons that are already under lease in the 740 acres of the Kaiser leases could possibly be recovered. Furthermore, it is misleading for BLM to assert on pages 6 and 29 that even the existing leases could be developed. Conditions require underground mining on Kaiser's leases, but surface facilities such as ventilation shafts and roads to reach and maintain them may be not only necessary, but are contractually allowed as a reasonable surface use attendant to the terms of the leases. On page 29 is a statement acknowledging that ventilation shaft might be required within the wilderness. That statement is not accompanied by any discussion of the need for special permission required to construct the shaft, thus leaving the impression that no such permission would be required. If ventilation facilities are needed on the surface, they would likely be required to double as an emergency escape-way. Federal and State safety regulations and common sense would dictate that the facilities be accessible by an adequate surface road. Furthermore, a ventilation shaft would require a fan, and therefore a powerline on the surface to the site. In addition, due to the sometimes gassy conditions encountered in coal seams in this area, prudence might dictate construction of a methane pumping system, requiring drill holes, pumps, and powerlines. However, if the area is designated wilderness, Kaiser would be forced to comply with FLMPA and BLM regulations for a plan of operations (pursuant to 43 CFR Subpart 3809) to construct these facilities. BLM rules currently in place only allow continuation of activities already being conducted on leases prior to establishment of a wilderness (43 CFR 3892.6). New facilities must not be inconsistent with wilderness use. There have not been mining activities thus far on the leases in question. Approval within a wilderness area would not be likely. Even if BLM were to approve construction of the facilities described above, which rights in the absence of wilderness Kaiser already enjoys by virtue of its leases, special interest groups could bring suit to prevent the construction of the facilities. At best, Kaiser could expect significant delays.

Even if no surface facilities were required on this specific property, Kaiser's operations at Sunnyside and those contemplated for this area are conducted by longwall mining methods, which include planned and controlled surface subsidence specifically allowed under the Surface Mining Act and regulations. Although no significant surface effects would be discernible to the naked eye, we could be held up by BLM or special interest group action if the area were declared wilder-

ness. Even outside the boundaries of the proposed wilderness area, underground mining operation could be challenged because subsidence occurs on an upward and outward angle from the longwall mining itself, thus arguably "affecting" the wilderness.

We haven't studied the situation enough to determine the total potential extent of restrictions on Kaiser's future operations, but we believe they could be substantial. However, that is beside the point for this discussion of the Draft EIS. The entire section on Turtle Canyon WSA because of inconsistent statements and assumptions and the failure to adequately address factors which will work to abrogate existing rights, is confusing and misleading.

As stated in the Draft EIS, the study indicated there are 1,620 acres not currently under lease that would be leased only if the area is not declared wilderness. There may be much more actual recoverable coal reserves in the area, since there is no indication the coal seams are not present in other areas. The extent of "recoverable" reserves appears to be limited strictly by height of seam and depth of cover. Advancement in mining methods in the future could make recovery possible under deeper cover and in thinner seams, opening up more potential reserves for lease to the east of the current Kaiser leases and the reserves described by SAI. [Kaiser Coal]

**67.11 RESPONSE:** Delineation of the wilderness study area boundaries was based on surface resource characteristic and did not take subsurface leases into account. This was done in accordance to provisions in FLPMA and the BLM's Wilderness Inventory Guidelines. Such leases were taken into account at the impact analysis stage. In the case in point it was determined that surface wilderness characteristic outweighed the value of the coal, which BLM feels could conceivably be developed primarily from outside the WSA. However, the Final EIS has been modified to indicate that underground mining may indeed require surface facilities to be constructed within the WSA. The text has also been modified to indicate mining may be done with longwall techniques which would result in surface subsidence.

Existing coal leases have valid existing rights since they were issued prior to any wilderness designation, thus allowing for their development. Such valid existing rights would allow the leaseholder to conduct work in the WSA if it were determined that "undue and unnecessary degradation" would not occur. At

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 67: TURTLE CANYON WSA (CONTINUED)**

the time of the Draft EIS, and indeed in the foreseeable future, mining in overburden of more than 3,000 feet and thickness of less than 3 feet does not appear feasible. Language has been added to the Final EIS that indicates future technological advances may result in the loss of more of the coal resources in the area.

For the purposes of the Final EIS, it has been projected that without wilderness designation the coal resource will be developed in the long-term future and that the potential for development and extracting of coal would be foregone with wilderness designation.

**67.12 COMMENT:** Coal is known to lie under a small fraction of the WSA on the northwest. Even though this is of commercial grade, no management conflicts are present. BLM correctly determined that deep mines entered from outside the WSA will make wilderness management of the surface feasible. The small size of the area to be mined makes outside access for ventilation and mining access the most logical answer. The designation will not affect mining of this resource. Exploration of oil and gas has ringed (five wells within 1 mile of the boundary) this WSA providing adequate evidence that commercial quantities of oil or gas are not present in this geologic structure. [Utah Wilderness Coalition]

**67.12 RESPONSE:** The Final EIS projects that coal mining would occur within the Turtle Canyon WSA in the long-term future. There are still 310 acres of coal leased that could be developed prior to its expiration. Also, the Draft EIS has been modified as to presentation of well data. This data indicates that several of the wells surrounding the WSA had significant oil and gas shows. Consequently the certainty rating has been changed from c3 to c4. A productive gas reservoir is known to be adjacent to the WSA and is presumed to extend under portions of the WSA.

**67.13 COMMENT:** According to Table 1, the All Wilderness Alternative will have no effect on development of the 55 million ton coal resource. In reality, no surface occupancy and other wilderness mandated stipulations may effectively prevent recovery of this resource. Additionally, the 27 million ton reserve figure should clearly be labeled as a room and pillar estimate (33 to 50 percent coal recovery). Longwall mining can be expected to produce much higher percentages of the coal. [State of Utah]

**67.13 RESPONSE:** Wilderness designation would preclude recovery of the coal resource located in the

Turtle Canyon WSA. BLM projects that with the No Action/No Wilderness Alternative this resource would be developed in the long-term future. Mining methods, such as room and pillar or longwall would be determined at time of development. Table 1 has been revised to focus on minerals that would be foregone in the foreseeable future with wilderness designation.

**67.14 COMMENT:** The areas I am particularly concerned with are Jack, Desolation, Turtle, Floy, Coal, Spruce, and Bruin Canyons. BLM has looked at mineral values and considered mineral values versus wilderness values. I think probably BLM is supposing a little too much in the mineral area. Maybe I can illustrate with a case in point. The Book Cliffs area and the Desolation Canyon area include some of the most rugged and remote country in Utah. These places have wildlife: black bear, bighorn sheep, mountain lion, deer, and elk. You can grow deer most anywhere. You can grow elk in a lot of places. But, there really are not very many places where you can get a good population of bear and lions. The only reason that they weren't recommended that I can figure out is their low to moderate potential for mineral development. Even if they had great potential for mineral development, the potential for wildlife and wilderness experiences are greater. [J. Barnett]

**67.14 RESPONSE:** Both the wildlife and mineral values of the WSA are addressed and analyzed in the EIS. Rationale for BLM's Proposed Action are summarized in Appendix 11 in Volume I.

**67.15 COMMENT:** In the text on Salable Minerals, the narrative states "other salable minerals would not be available for the staking of claims . . ." You cannot locate a mining claim for salable minerals, that is why they are salable versus locatable. The following sentence in the narrative mentions favorability for hard rock minerals. You are mixing two distinct types of minerals classifications, each with its own set of regulations and basis in law. These classifications had their own set of regulations and basis in law. This whole section should be rewritten and clarified. This also applies to the salable mineral and should be rewritten and clarified. This also applies to the salable mineral narrative on page 33. Also by "permit" do you mean a free-use permit? What about mineral material sales? Are sales being excluded? [Agency comment]

**67.15 RESPONSE:** The Final EIS has been reworded to correct the errors.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 67: TURTLE CANYON WSA (CONTINUED)**

**67.16 COMMENT:** Mineral conflicts are nonexistent. The Draft EIS points out that any coal underlying the WSA could be recovered even with wilderness designation, since the coal is located along the boundary. We question the (f3) rating for oil and gas which seems high given the analysis in the Draft EIS. The Draft EIS states, "No producing wells have been drilled, and it is unknown whether adequate reservoirs for production are present within the WSA. To date, all wells drilled in the vicinity have been dry except one." A number of other statements in the Draft EIS indicate potential is very low. Given this information, the Draft EIS is correct in stating that the All Wilderness Alternative will have an insignificant impact on development. [Utah Wilderness Association]

**67.16 RESPONSE:** See the response to Specific Comment 67.12.

**67.17 COMMENT:** The analysis on page 117 (Volume I) is wrong. It says Turtle Canyon is a WSA where predator control could be constrained and higher losses could be expected because it is one of eight WSAs "where sheep grazing occurs." However, the site specific report in Volume VI clearly notes only 30 acres of a sheep allotment is in the WSA and that it has not been grazed since 1975! There can be no predation upon sheep where sheep are not found. Floy Canyon is in a similar situation. Although two sheep allotments occur in the WSA, they are not within BLM's partial alternative which has been selected as the Proposed Action. [Utah Wilderness Association]

**67.17 RESPONSE:** The livestock grazing use data table for the Turtle Canyon WSA has been amended to reflect the correct acres and AUMs of sheep use in two grazing allotments within the WSA. Predator control was not practiced in either of these two allotments during 1986-1987. However, the analyses in the Draft EIS is correct since restrictions on predator control, especially on sheep allotments, could cause an increase in livestock losses.

**67.18 COMMENT:** Turtle Canyon WSA has high wilderness-quality values and moderate conflicts compared with the other WSAs in the region. Resource conflicts include oil and gas potential and coal development that are not reduced by any partial alternative. The WSA also contains groundwater resources. Livestock conflicts can be reduced by the 27,960-acre Partial Wilderness Alternative. [State of Utah]

**67.18 RESPONSE:** The comment is noted. The Final EIS recommends a Partial Wilderness Alternative of 27,960 acres.

**67.19 COMMENT:** When wilderness value inventories are completed, additional information is likely to support the designation of this area. BLM has not performed an inventory of threatened and endangered species in this area. If more of the area were inventoried for archaeological sites, a large number probably would be found. Less than 1 percent of the WSA has been inventoried for archaeological sites at this time. [Utah Wilderness Coalition]

**67.19 RESPONSE:** See the responses to General Comments 9.6 and 20.2.

**67.20 COMMENT:** Recreation: Is there any recreational river use of Range Creek? [State of Utah]

**67.20 RESPONSE:** As discussed in the Draft EIS, Range Creek is used for hunting and fishing opportunities and occasional horseback trips. However, Range Creek flows through the WSA for less than a 0.5 mile in the northern portion of the WSA. Consequently, recreational use of Range Creek within the WSA is limited.

**67.21 COMMENT:** The EIS is not clear on the extent of opportunities for solitude in the Turtle Canyon WSA. [State of Utah and Owen Severance]

a. I support BLM's Proposed Action of All Wilderness for 33,690 acres. "Differences in topographic features, vegetation productivity, variety in wildlife, and wildlife habitat represented in the WSA are highly unusual and seldom represented in an area the size of the WSA." Why doesn't the Draft EIS state how much of the WSA meets the requirement for outstanding solitude? The SSA states that all of the WSA meets the outstanding requirement. The importance of this area for wildlife is another reason for BLM to continue the all wilderness recommendation.

b. Do outstanding opportunities for solitude exist throughout the entire WSA?

**67.21 RESPONSE:** The Final EIS has been amended to clarify the narrative on solitude. Overall the entire WSA provides outstanding opportunities for solitude. It should be noted that the Partial Wilderness Alternative is BLM's Proposed Action for the Turtle Canyon WSA.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 67: TURTLE CANYON WSA (CONTINUED)**

**67.22 COMMENT:** The benefits of designating adjacent areas should be discussed. [John Veranth]

a. In the individual WSA sections, the "size" section states areas are of sufficient size to enhance wilderness values. Why was the additional benefit of the adjacent areas not discussed?

b. This is a large contiguous roadless area consisting of 600,000 acres of BLM land. When adjacent State and Indian roadless lands are included, the potential roadless/wilderness area totals about a million acres. The synergistic benefits of the adjacent areas is not fully addressed in the Draft EIS. This large area would allow human impact sensitive wildlife species to spend the entire year in a roadless area since the elevation range encompasses both summer and winter range. Why was the wildlife benefit not considered in the analysis?

**67.22 RESPONSE:** Refer to Volume I of the Final EIS. A new Statewide alternative has been added which analyzes this "cluster" potential. See Chapter 1 of Volume I for the discussion of wildlife issues.

**67.23 COMMENT:** The Emery County Planning and Zoning Ordinance is designed to:

1. Protect the tax base.

2. Foster agriculture and industry, including mineral reduction and processing plants, together with uses.

3. Stabilize and improve property values.

We do not feel that the BLM Draft EIS takes these issues into consideration. The county planning and zoning ordinance further zones the nine WSAs as well as surrounding areas as M&G-1 for mining and grazing. Wilderness designation will eliminate mining and could possibly affect grazing in those areas where wilderness values might be impaired. At this time, I would like to submit to you a copy of the Emery County Community Development and Housing Plan adopted on January 15, 1986, to become a matter of record. Quoting from Section C of this plan, I conclude: "C. Open Space: In attempting to determine the best possible uses of the land within the county's jurisdiction, the Commission is required to make decisions concerning trade-offs between possible conflicting uses and planned changes in present uses." Land use has always been of top concern in Emery County and accordingly,

the county has adapted a zoning resolution in accordance with the earlier mentioned comprehensive plan and its accompanying statement of intent.

Further, Emery County positions itself:

1. To support the highest, economically allowable development of known mineral and energy resources throughout the county.

2. To utilize public lands under multiple use management. All present and prior uses of public lands shall be preserved, except where economically unfavorable.

3. To maintain at least present levels of AUMs on public lands.

4. To preserve current uses of public lands which are adjacent to privately or State-owned lands, the economical uses of which depend upon access and usage of adjacent public lands. Full disclosure of all ramifications shall be made to the county prior to any changes of uses on public lands, and the county shall be permitted to review and comment on each proposed change, consistent with applicable Federal statutes.

5. To support land exchanges within the county where they can be shown to be economically beneficial to the county, and only when they county officials are provided opportunities for input in the decision process.

6. To study intensively all areas included in the Wilderness Study Areas 023, 054, 029A, 007, 045, 068A, and 067, including drillings and other appropriate samples. While the county recognizes that there are areas in the county of critical environmental concern, not enough is known regarding subsurface minerals and resources. Under no circumstances will the county agree to any wilderness designations without a thorough analysis of all potential resource developments affected thereby. On these matters the county intends to play a role in the decision making process as provided by law. [Emery County]

**67.23 RESPONSE:** See the response to Specific Comment 59.43.

**67.24 COMMENT:** The Draft EIS is remiss in its recommendations for wilderness in that even though it acknowledges the presence of the Emery County



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 67: TURTLE CANYON WSA (CONTINUED)**

Planning and Zoning Ordinance which calls for a multiple use sustained yield mode of management, it does not couch its recommendations for wilderness accordingly, and in those cases where wilderness is recommended, it does not include a list of factors which act in disharmony with local planning objectives. [Emery County]

**67.24 RESPONSE:** See the response to Specific Comment 25.23.

**67.25 COMMENT:** The Draft EIS incorrectly concludes that a nonwilderness recommendation would be consistent with other plans. Wildlife management planned by both BLM and the Utah Department of Wildlife Resources would be adversely impacted by lack of protection from continued mineral exploration, off-road vehicle use, and other destructive land uses not allowed within wilderness areas. [Utah Wilderness Coalition]

**67.25 RESPONSE:** Introduction of bighorn sheep or elk are possible in or adjacent to the WSA. While carrying capacity for these species might be reduced under the No Action/No Wilderness Alternative, populations could become established. While optimum population levels and habitats conditions for some species (e.g., mountain lion, black bear) may not be achieved with nondesignation, the species would continue to be present at lower population densities.

**67.26 COMMENT:** Because of UP&L's responsibility to provide electricity for future growth and development in Utah, the proximity of five WSAs in the BLM Proposed Action alternative to its future steam electric generating stations is of serious concern. No future plants are located in WSAs. Should UP&L's next steam electric plant be one of those listed below, a full EIS would be required as part of the planning process. UP&L is concerned, however, that it would be precluded from building to meet future generation needs in the most efficient and economical manner because of wilderness designation between now and the time the plant is needed. Future steam electric generating plants may be jeopardized if additional air quality restrictions are placed on future wilderness areas. The plant sites and distances from the nearest WSAs are listed below: [Utah Power and Light]

<u>Plant Site</u>	<u>Distance/Direction</u>	<u>Nearest WSA</u>
Mounds	10 miles/east	67
East Canyon	12 miles/southeast	67

<u>Plant Site</u>	<u>Distance/Direction</u>	<u>Nearest WSA</u>
Wellington	25 miles/southeast	67
Gordon Creek	32 miles/southeast	67
Woodside	4 miles/southeast	66
Green River	10 miles/southeast	62
Westwater	5 miles/southeast	72

**67.26 RESPONSE:** See the response to Specific Comment 62.43.

**67.27 COMMENT:** Elimination of 27 million tons or more of recoverable coal, including coal royalties for both the Federal and State governments, as well as cut short the mine life at Sunnyside. This loss must be reflected as a cost of proposing the wilderness alternative. Because of the serious resource conflicts, BLM should drop this WSA completely. At the very least, if some of the WSA is recommended for wilderness designation, the western boundary should be moved several miles to the east to eliminate current and potential future conflicts with the valuable resources contained on and adjacent to the Kaiser leases. [Kaiser Coal]

**67.27 RESPONSE:** The EIS recognizes that wilderness designation would alter future economic conditions as compared to the No Action/No Wilderness Alternative.

**67.28 COMMENT:** In Volume I it is indicated that "Utah's mining industry now accounts for less than 3 percent of the State's total employment." In Emery County, over 50 percent of the local work force is either in mining or a utility related position. The Draft EIS indicates that Emery County is one of six counties that could have "the greatest potential for significant impacts resulting from designation," yet the BLM Proposed Action does not appear to take this into consideration. We ask that BLM carefully weigh their recommendations and decisions as they complete their Final EIS. [Emery County]

**67.28 RESPONSE:** See the response to Specific Comment 59.47.

**67.29 COMMENT:** The future of present land uses critically relies on continued wilderness protection. Commercial hunting and outdoor recreation is a critical component of local economy, particularly those using Range Creek. The vegetation ties to the water collected in this extremely mountainous area. Dense fir stands are found on the north-facing slopes in Cherry, Meadow, Mitchs, Nelson, and Bear Canyons and their many side draws. Wilderness designation is

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 67: TURTLE CANYON WSA (CONTINUED)**

essential for future wildlife management programs. Continued existence of sensitive wildlife such as black bear, mountain lion, and bighorn sheep require little interference from humans. To stabilize these species requires wilderness designation in this portion of the Book Cliffs. [Utah Wilderness Coalition]

**67.29 RESPONSE:** The Final EIS indicates that about 60 to 100 hunters per year use the WSA, mostly in the Range Creek vicinity. The Final EIS also describes the vegetation and wildlife in the WSA. The hunting and other recreational use in the WSA contributes only a small economic benefit to the local economy.

**67.30 COMMENT:** Exxon believes each of these areas contain geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which led us to this recommendation. [Exxon Corporation]

**67.30 RESPONSE:** See the response to Specific Comment 65.5. The proposed Partial Wilderness Alternative would allow for explanation in a portion of the WSA.

**67.31 COMMENT:** Dry holes at the Bogart Canyon site and other sites around Book Cliffs should convince oil companies that no profit is to be made there. These findings support conservationist claims that wilderness is the most appropriate land use for the WSAs in this region. BLM should deny further leases and exploration claims on Book Cliffs WSAs (Turtle, Floy, Coal, Spruce, and Flume Canyons), which have already been extensively explored, and recognize the paramount wilderness attributes of these areas. [Wasatch Mountain Club]

**67.31 RESPONSE:** See the responses to General Comment 15.1 and Specific Comment 67.12

**SECTION 68**  
**FLOY CANYON WSA**

**68.1 COMMENT:** The Floy Canyon WSA should be combined with the Desolation Canyon WSA in the Final EIS. [Uintah Mountain Club and Utah Wilderness Association]

a. There is a procedural problem with your study and recommendation for the Floy Canyon WSA. At the initiation of your WSA inventory, the Floy Canyon WSA was not the separate entity that it appears today. Rather, it was part of the larger Desolation Canyon WSA. Floy Canyon was peremptorily dropped from further consideration, and subsequently reinstated through an appeal to IBLA. Since that time, Floy Canyon has been found to have "outstanding" wilderness characteristics, as described in your Draft EIS. That's odd. We suspect that Floy Canyon WSA was severed from the Desolation Canyon unit to allow access to a Tenneco drill site at the head of Right Hand Tusher Canyon. The road to the site became a contrived "boundary"--the only way that road building in Tusher Canyon could have been justified. This was singularly inappropriate and inconsistent with the spirit and intent of the FLMPA which guided the wilderness review. We object to this procedural impropriety, while acknowledging the necessity of responding to your analysis of this tailor made WSA in the Draft EIS.

b. The boundary between Desolation and Floy Canyon WSAs is Right Hand Tusher Canyon. At the time of the inventory, a jeep trail existed part of the way up Right Hand Tusher Canyon. In 1981, BLM allowed Tenneco to upgrade the jeep trail and build several miles of new road to the head of Tusher Canyon, where they drilled a well. The well is shutin and as of spring 1985, the road was no longer passable a couple of miles beyond the forks of Tusher Canyon. Most of the road was built in the wash bottom and has been obliterated by spring runoff. The lease, which the shutin well is holding, will expire soon and should be followed by road reclamation, if necessary. The two units should be recombined for analysis in the Final EIS.

**68.1 RESPONSE:** See the response to Specific Comment 66.16.

**68.2 COMMENT:** An error in the Statewide "Manageability" Alternative needs to be corrected.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

The Floy Canyon WSA coal is not leased and there are no valid, existing rights that would prevent the area from being managed as wilderness. The "Manageability" Alternative should include the All Wilderness Alternative for Floy Canyon. [Utah Wilderness Association]

**68.2 RESPONSE:** The Statewide Manageability Alternative has been deleted from detailed analysis in the Final EIS.

**68.3 COMMENT:** The rationale in the Draft EIS for this area is very poor. It is difficult to tell why BLM will not recommend this area for wilderness. [Sierra Club, Cache Group]

**68.3 RESPONSE:** BLM's rationale is summarized in Appendix 11 in Volume I of the Final EIS.

**68.4 COMMENT:** The Draft EIS recommends that only 23,140 acres of the 72,605-acre Floy Canyon WSA be designated as wilderness. The entire area deserves to be designated. It is the crucial link between the huge Desolation complex on the west side of the Book Cliffs complex and the huge south Book Cliffs complex of the Coal, Flume, and Spruce Canyons WSAs. This canyon and its adjoining WSA neighbors make up what is probably the largest, most remote, and most wild area in the entire State. The area provides habitat for "mule deer, elk, bear, cougar, coyote, bobcat, blue grouse, ruffed grouse, chukar, and numerous species of raptors, songbirds, small mammals, reptiles, and amphibians . . ." according to the Draft EIS. Many of these species are extremely sensitive to the presence of human intrusions. This area is very remote and almost completely untouched. According to the Draft EIS: "A complete inventory for historic or prehistoric values in the WSA does not exist . . . It is estimated that an excess of 60 sites could be in the WSA, with 30 of these having National Register potential . . ." The fact of the matter is that this area is so wild that BLM does not even know what is in it! "The deeply incised, branching drainages within the WSA allow dispersion of recreational use and provide for outstanding solitude." This area is "clearly and obviously" wilderness. I strongly urge you to reconsider your recommendations for this entire area and hope to see a recommendation for a 457,800-acre Desolation Canyon Complex/Floy Canyon wilderness in the Final EIS. [Scott Delong]

**68.4 RESPONSE:** See the response to Specific Comment 66.20. See Appendix 11 in Volume I for a sum-

mary of the rationale for proposed wilderness. BLM has proposed partial wilderness designation for the Coal, Spruce, and Flume Canyon WSAs, which is a modification from the Draft EIS.

**68.5 COMMENT:** You state that "disturbance in the form of roads and drill pads could . . . alter the composition of the riparian community (less than 5 percent of the WSA)." You don't mention the impacts of parking lots, administrative and shop buildings, and 24-hour lighting associated with a fair-sized mining operation. What could be a more important part of the WSA than the riparian zone? You estimate surface disturbance that may occur in your alternative to be as follows:

oil and gas operations	109 acres
uranium/vanadium mining	14 acres
coal development	864 acres
range improvements	<u>205 acres</u>
total	1,192 acres

The No Action Alternative would only be twice as much. Why, then, exclude 49,465 acres from wilderness consideration? No species are threatened or endangered by your proposed alternative, yet it is the cumulative effect of deletions like that in Floy Canyon WSA that determines whether our wildlife will continue to thrive. Historically, habitat degradation and destruction is the single most important cause of species attrition. There is simply no question about the importance of Floy Canyon WSA and adjacent units in the southern Book Cliffs if we consider the future of wildlife and big game hunting in Utah. Why open this excellent habitat to speculative energy interests? Wildlife values are preeminent in this case.

We request that BLM draft an alternative that designates wilderness to all areas except the 1,192 acres that would be disturbed if development were to occur. We also request that BLM provide a map which clearly shows where the coal resource lies and where the 1,192 acres subject to impact are located. We request that BLM explain thoroughly a reasoning behind any acreage recommendations. [Uintah Mountain Club]

**68.5 RESPONSE:** The Final EIS has modified the acreage of surface disturbance for the different alternatives. It is now projected for the Partial Wilderness Alternative that 312 acres of surface disturbance would occur in the nondesignated area. See Appendix 11 in Volume I for a summary of the BLM rationale for designation for a portion of this WSA as

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 68: FLOY CANYON WSA (CONTINUED)

wilderness. Major negative impacts on wildlife species are not projected in the Final EIS. This is due largely to the reduction in anticipated disturbance as well as to the continuation of management that would protect inherent wildlife values even without wilderness designation.

**68.6 COMMENT:** Why delete two-thirds of this area for potential coal conflicts when probably only half of that area contains a questionable quality of coal? Better coal could be mined in existing economies in Carbon and Emery Counties which are dependent on it and more benefit received by the local economy through recreation opportunities in the wilderness.

BLM recommends a Partial Wilderness Alternative for Floy Canyon WSA and bases this recommendation on the need to protect a coal resource in the southern part of the WSA. Yet, by BLM's own admission, this resource is not likely to be developed in the foreseeable future. Furthermore, BLM offers no evidence to support its claim that coal would or could be developed over the long term. BLM does not define what it means by "foreseeable future" and "development" over the long term and the distinction between them. In order to protect this unlikely coal resource, BLM recommends nondesignation for an area of land 40 times the size of the land that would actually be disturbed if all mineral resources were developed in the WSA, even though these additional lands have outstanding wilderness values according to the BLM's nondesignated portion. BLM does not even identify the specific location of the coal resource or the location of the 1,192 acres it claims could potentially be disturbed by mineral development. It is requested that BLM substantiate the feasibility of developing the coal resource in the long-term future or change its recommendation to an All Wilderness Alternative. We request that BLM pinpoint the coal resource and the specific lands that would be disturbed by development and draft an alternative that would exclude from wilderness designation only those lands that would be disturbed. [Pamela Quayle]

**68.6 RESPONSE:** Based on additional studies, coal development is no longer anticipated to occur within the foreseeable future within the Floy Canyon WSA. However, an oil and gas resource is believed to occur in the WSA. BLM projects that this resource would eventually be developed with the No Action/No Wilderness Alternative. The Final EIS has been modified to reflect this change. See Appendix 11 in Volume I for a

discussion of the BLM rationale for partial designation for this WSA.

**68.7 COMMENT:** BLM's rationale for the proposed Partial Wilderness Alternative is inadequate. [Utah Wilderness Association and David Jorgensen]

a. BLM's recommendation for Floy Canyon is completely inadequate to protect the wilderness values of the WSA. Twenty-five thousand acres have been excluded because of potential coal conflicts. No rationale has been given for excluding an additional 25,000 acres west of the KRCRA. The Draft EIS does an excellent job in describing the WSA's unsurpassed wilderness values and the importance of maintaining those values throughout the WSA if the black bear, cougar, and elk are to survive. That's why it is so hard to understand why BLM would so hastily drop 50,000 acres from the suitable recommendation, 25,000 of which has no apparent conflict. This decision is insupportable. The excluded portion contains several major canyons. Nearly all of them have water (Horse Canyon, Middle Horse Canyon, Floy Canyon, Dry Fork, Crescent Canyon, Thompson Canyon, and Right Hand Thompson). The length of the canyons, availability of water, and the opportunity for many loop routes make this portion of the WSA ideally suited for primitive recreation. The area has Class A scenery, containing hoodoos, pedestal rocks, multi-hued cliffs and slopes, and waterfalls in some of the creeks. To exclude 25,000 acres of this area, even though there are no conflicts present, is a highly questionable decision.

b. In the nonrecommended part of the WSA where mineral conflicts exist, the major conflict is coal. Apparently coal is the major reason why only 23,000 of the unit's 72,000 acres were recommended. However, the KCRA covers only 25,000 of the 49,000 nonrecommended acres. At the minimum, the 24,000 nonrecommended acres outside the KCRA should be included within the wilderness recommendation.

**68.7 RESPONSE:** See the response to Specific Comment 68.6.

**68.8 COMMENT:** Speculative mineral values should not override known wilderness values. [Slickrock Outdoor Society, Uintah Mountain Club, and Utah Wilderness Association]

a. The area with the coal conflict is also recognized as having outstanding wilderness and wildlife

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

values throughout. Unfortunately, the acreage is deleted based simply on the existence of coal and not after carefully considering the ramifications of the decision and the unimportance of the coal resource. The Draft EIS admits the coal will likely not be developed in the foreseeable future because better, more accessible coal is available elsewhere. That's accurate since existing mines in Carbon and Emery Counties are unable to sell their "better, more accessible coal." The Draft EIS describes the impact of the All Wilderness Alternative as probably "insignificant." Given the fact the local economy is heavily reliant on tourism and expected to become even more so, and not at all reliant on coal mining, it seems foolish to trade a potential tourism gem for a very speculative coal mine. Worse yet, the public will lose a wilderness treasure for the profits of a few. None of the coal is leased so no one will lose any rights whatsoever if the All Wilderness Alternative is adopted. The Book Cliffs WSAs' coal resource is minuscule when compared to the State as a whole. If BLM is not going to recommend any wilderness in the Kaiparowits field (where the majority of the coal is), then coal should not drive decision-making in the Book Cliffs.

b. The value of recoverable coal is cited as approximately 711 million tons. This is about 1.2 percent of Utah's total estimated coal reserves. This is an extremely small volume of coal, made even less significant by your accurate observation that there is "better quality, ore accessible coal elsewhere in the vicinity," but "outside" of the WSA. Why, then, do you recommend excluding almost 50,000 acres from this WSA on the basis of coal potential? The coal is not even leased, so there is no particular mandate for its use. The only value foregone would appear to be that which may become available through future leasing of this resource. We feel that other tangible values should receive more consideration. Should some of the finest wildlife habitat in the State be sacrificed to the dubious importance of 71 million tons of coal? We think not. Wilderness designation is by act of Congress. If this insignificant coal resource becomes absolutely indispensable at some later date, the legislative apparatus exists to claim it. We feel that you should acknowledge the far superior natural values now. We can worry about being coal-short later.

c. We assume that the 50,000-acre deletion from the WSA that BLM is proposing is to resolve conflicts in proposed land uses; i.e., wilderness versus gas, oil, and coal development. How serious is the conflict? BLM's own rating for favorability of producing

oil and gas from within the WSA is low. I am unsure of the total number of exploratory wells drilled at the periphery and within the WSA. I personally have visited over a dozen. All are abandoned, none of them ever having produced, adding credibility to the low probability of extracting significant reserves from within the WSA. The coal resource is known to exist. How important is this resource now and in the foreseeable future? BLM does not feel development is likely because of varying quality and because higher quality, more accessible coal is available locally outside the WSA. The point here it would seem is that the wilderness resources throughout the WSA are documented as being unquestionably outstanding; the energy resource is marginal at best and yet preserving the right to access this resource is "driving" BLM's decision. The probability is that the public will never derive one Btu of benefit from energy produced within this WSA, yet the wilderness resource remaining in the unprotected portion of the WSA most assuredly will be degraded; perhaps irretrievably, from exploratory activities. If down the road this coal becomes economically feasible and socially acceptable to recover, it will still be there.

**68.8 RESPONSE:** See the response to Specific Comment 68.6. The oil and gas resource has been reevaluated to reflect more current data. See the response to General Comment 15.1. The Final EIS was modified to reflect a moderate favorability for oil and gas (up from a low favorability in the Draft EIS). See Appendix 11 in Volume I for the BLM wilderness designation rationale.

**68.9 COMMENT:** Why does the Proposed Action not include the 810 acres in Showerbath Canyon (outside the WSA) that was included in the Draft SSA. The reason for its inclusion in the Draft was to improve manageability. This piece of land contains Showerbath Spring, a wonderful spot certain to become popular as the WSA becomes better known. We assume the exclusion was an oversight and encourage BLM to include it in the final recommendation. [Utah Wilderness Association]

**68.9 RESPONSE:** Acreage outside the WSA is not being considered because other public lands were dropped from study during the inventory phase (refer to the response to General Comment 3.1).

**68.10 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

**68.10 RESPONSE:** A statement has been included in the Final EIS concerning these resources.

**68.11 COMMENT:** We feel that sediment load from even modest road construction and site preparation would result in unacceptable degradation of water quality in the Book Cliffs WSAs. Continued activities on-site, especially with ongoing mining activities or the establishment of oil and gas "fields," would likely cause continued erosion in this up-and-down canyon country. In the canyons with perennial streams, beaver dams--nature's own "instream drop structures"--would certainly be affected. Don't meddle. If there is to be soil loss, let it be under the All Wilderness Alternative. [Uintah Mountain Club]

**68.11 RESPONSE:** The preferred alternative projects approximately 1,075 acres of surface disturbance in the foreseeable future. Approximately 84 percent of this acreage (905 acres) would be vegetation treatments (prescribed burn and seeding). These treatments would improve water quality and lessen soil erosion. The proposed watershed treatment structures (retention draws, gully plugs, etc.) would also aid water quality. The remaining 170 acres amounts to less than 1 percent of the WSA and would not cause significant impacts to water quality or soil erosion. Also, see the response to Specific Comment 66.31.

**68.12 COMMENT:** UP&L has pending water rights on the Green River equal to 4,355,000 acre-feet of storage and 29,500 cfs of direct flow. UP&L filed its water applications in these WSAs prior to the time that they were being studied for wilderness designation, in conjunction with its plans for developing steam electric generating plants near Green River and Wellington, Utah. [Utah Power and Light]

**68.12 RESPONSE:** See the response to Specific Comment 66.33.

**68.13 COMMENT:** Dry holes at the Bogart Canyon site and other sites around the Book Cliffs should convince oil companies that no profit is to be made there. These findings support conservationist claims that wilderness is the most appropriate land use for the WSAs in this region. BLM should deny further leases and exploration claims on Book Cliffs WSAs (Turtle, Floy, Coal, Spruce, and Flume Canyons), which have already been extensively explored, and recognize the paramount wilderness attributes of these areas. [Wasatch Mountain Club]

**68.13 RESPONSE:** See the responses to Specific Comment 68.8 and General Comment 15.1. A moderate to high-moderate certainty exists that the WSA contains between 10 and 50 million barrels of oil and 60 and 300 billion cubic feet of gas. Anticipated production from this area will mainly be found in pools formed by stratigraphic traps and not structural closures. Stratigraphic traps are usually more difficult to discover and require more exploration and drilling before discovery. Based on new data, the minerals sections in the Final EIS has been changed to reflect and increased favorability for oil and gas in the WSA.

**68.14 COMMENT:** You point out that there is "a moderate certainty" of oil and gas due to the proximity of other fields. The WSA was given a "low" rating for oil and gas based on the shape of the sedimentary strata and the high rate of dry holes that had been drilled to date on or adjacent to the WSA. There is a very low favorability for oil shale. We must assume, then, that oil and gas is not an issue. [Uintah Mountain Club]

**68.14 RESPONSE:** See the responses to Specific Comments 68.13 and 68.17. Oil and gas has been identified as a specific issue in the Final EIS due to potential conflicts with wilderness designation.

**68.15 COMMENT:** In the Book Cliffs field, several WSAs (Spruce, Flume, Floy, and Coal Canyons) contain coal deposits. USGS investigations of Floy Canyon WSA, typical of these WSAs, indicate that the coal seams are too thin (less than 4.5 feet) to be economically recoverable. [Utah Wilderness Coalition]

**68.15 RESPONSE:** See the response to Specific Comment 68.6. The coal seams present in these WSAs may, in places, attain a thickness of 7 to 9 feet. Seams thin rapidly and are lenticular. The relative overall thin coal seam thickness will reduce chances for development. Coal development is not projected in the foreseeable future.

**68.16 COMMENT:** The statement that "the geologic structure of the WSA is not suited to the occurrence of oil shale" should probably be rephrased since oil shale is not a structurally controlled commodity. It is agreed, however, that significant oil shale beds are unlikely to occur in this area. [State of Utah]

**68.16 RESPONSE:** The comment is noted. Oil shale is not structurally controlled. The statement has been modified in the Final EIS to correct this error.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

**68.17 COMMENT:** The discussion on leasable minerals seems to support a much more favorable rating for oil and gas than the SAI rating of f2/c3. [State of Utah]

**68.17 RESPONSE:** See the responses to Specific Comment 68.8 and General Comment 15.1. Based upon additional information received during the public comment period, the SAI rating has been changed to support a f3/c3 rating for oil and gas in the Floy Canyon WSA.

**68.18 COMMENT:** Though it is never mentioned, we suspect the exclusion might be due to a conflict with oil and gas (this seems to be the general rationale throughout the Book Cliffs). The data does not support any deletions based on oil and gas. The Draft EIS gives the WSA a "low" rating for oil and gas potential and describes the decision as difficult. "The difficulty in assigning a rating stems from the relatively horizontal layering of the sedimentary strata in the WSA. Without structural traps there is likely to be little hydrocarbon accumulation" (page 16). Several wells were drilled in the early 1980s in Tusher Canyon (bordering the deleted acres), and those wells turned up dry. The only "successful" well borders the suitable acreage, but it is likely to never produce. The portion of the WSA with the highest potential for oil and gas, identified in the Draft SSA, is north of the deleted acreage. The record indicates there is no real conflict with wilderness designation on an additional 25,000 acres of the WSA that contain outstanding wilderness values.

BLM recommends designating the northern third of this area, 23,140 acres, as wilderness. The designated portion contains the northern reaches of Floy and Thompson Canyons and ridges abutting the Roan Cliffs. BLM would leave over two-thirds of the WSA, 49,465 acres, nondesignated. BLM's Partial Wilderness Alternative is designed primarily to resolve potential conflicts with coal resource in the southern part of the WSA, and secondarily to resolve conflicts with other mineral/energy resources and a proposed vegetation treatment. The coal resource occupies 25,540 acres, but BLM estimates that only 864 acres in the nondesignated portion would have to be disturbed to develop the coal. In addition, 14 acres could potentially be disturbed to recover uranium/vanadium, 109 acres to recover oil and gas, and 205 acres in the nondesignated portion are slated for a vegetation treatment consisting of a controlled burn. In all, out of 40,465 acres not designated for wilder-

ness BLM estimates that only 1,192 acres would actually be disturbed if all potential development took place. BLM's claim that coal could be developed in the southern part of the WSA is unsupported. The SAI rating for coal indicates that a moderate amount could exist in the WSA. BLM admits that this resource is not likely to be developed. BLM bases its recommendations, then, on a resource which is not likely to be developed at any foreseeable time. BLM simply claims that "the coal resource in the WSA could be extracted in the long-term future." But no where in the Draft EIS does BLM provide evidence to support this claim. No where does BLM explain why "long-term" development is more likely than development in the "foreseeable future" or what conditions would have to change in order for long-term development to become feasible. Only feasible developments should be considered as a basis for wilderness recommendations; anything else is mere speculation. Therefore, BLM needs to substantiate a reasonable likelihood of coal development sometime in the future, or change its recommendation to the All Wilderness Alternative. BLM should address this issue by defining the terms "foreseeable future" and "long-term future" and the distinction between them, and then by discussing such issues as the probability of coal development occurring in certain time periods; the potential profitability of this resource; the presence of other resources necessary to development, etc. [Utah Wilderness Association]

**68.18 RESPONSE:** See the responses to Specific Comments 68.8, 68.13, and 68.17 and General Comment 15.1.

**68.19 COMMENT:** The Utah Division of Wildlife Resources identifies over 50,000 acres of the Floy Canyon WSA as "crucial" wildlife habitat. Much of this is big game habitat. The Bureau recognizes the outstanding opportunities for primitive and unconfirmed recreation, yet recommends only 23,000 acres as wilderness because of the highly speculative possibility that significant quantities of coal may exist in the remainder. We feel that wildlife and natural values far outweigh coal and hydrocarbon potential, and that the entire area should be included in the wilderness proposal. [Uintah Mountain Club]

**68.19 RESPONSE:** See the responses to Specific Comments 68.5 and 68.6. Also, see Appendix 11 in Volume I for the BLM rationale.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

**68.20 COMMENT:** Riparian habitat is mentioned here but specific impacts are not detailed. They should be described. [Scott Mills]

**68.20 RESPONSE:** See the response to General Comment 13.11.

**68.21 COMMENT:** Probably the biggest tragedy in the whole BLM wilderness review in Utah, is BLM's recommendation of only 23,000 acres in over a quarter million acres of wilderness land in the eastern Book Cliffs. BLM recognizes in the EIS that virtually this entire quarter million acres of land is crucial habitat for elk, black bear, and cougar. The reason it's crucial is because it's all that's left that's roadless in the Book Cliffs. It's amazing where these species have been driven. It's especially crucial for black bear. It's probably the last stronghold in the State of Utah for black bear. The reason that all of these areas have been left out of the review is again potential oil and gas development. BLM should have all of the information they can get on these areas before they make a recommendation to Congress. The areas that are omitted in the eastern Book Cliffs have recognized high wilderness values. BLM recognized they may be the highest wilderness values in the State of Utah, and yet by recommending as unsuitable now, BLM eliminates the opportunity for these areas to have the GS/BM studies that will be done on all the suitable areas. There is no reason not to recommend their areas as wilderness at this stage in the process. BLM admits that all of the information on the oil and gas resource is highly speculative. It may or may not exist in this area. The decision to leave those areas out is purely political. At this state, BLM should base their decisions on resource data, make sound resource decisions, and leave the politics to Congress. That's why Congress has reserved the right for themselves to make final determination on wilderness areas. [George Nickas]

**68.21 RESPONSE:** In the Final EIS BLM has recommended the Partial Wilderness Alternative for each of the four WSAs which make up the eastern Book Cliffs (Floy, Flume, Coal, and Spruce Canyons). Of the 208,785 acres within these four WSAs, 75,145 acres (36 percent) has been recommended for wilderness designation, an increase of 52,005 acres over that proposed in the Draft EIS. The remaining acreage will be managed under existing laws and land use plans. These laws and plans restrict certain uses, for example mineral exploration, that are not compatible with other values within the WSA, such as wildlife

habitat and populations, visual resources, watershed values, threatened and endangered species, etc. Consequently these resources will continue to be managed for their inherent values in those areas not recommended for wilderness designation. Also, see the response to Specific Comment 66.21.

**68.22 COMMENT:** The areas I am particularly concerned with are Jack, Desolation, Turtle, Floy, Coal, Spruce, and Bruin Canyons. BLM has looked at mineral values and considered mineral values versus wilderness values. I think probably BLM is supposing a little too much in the mineral area. Maybe I can illustrate with a case in point. The Book Cliff area and the Desolation Canyon area include some of the most rugged and remote country in Utah. These places have wildlife: black bear, bighorn sheep, mountain lion, deer, and elk. You can grow deer most anywhere. You can grow elk in a lot of places. But, there really are not very many places where you can get a good population of bear and lions. The only reason that they were not recommended that I can figure out is their low to moderate potential for mineral development. Even if they had great potential for mineral development, the potential for wildlife and wilderness experiences are greater. [J.D. Barnett]

**68.22 RESPONSE:** See the responses to General Comments 8.14 and 8.16. Both the wildlife and mineral values of the WSA are addressed and analyzed in the EIS. The rationale for the BLM Proposed Action are summarized in Appendix 11 in Volume I.

**68.23 COMMENT:** Threatened and endangered species are summarily dismissed. The Draft EIS Volume I notes no terrestrial threatened and endangered species are found in WSAs and the only nonaquatic threatened and endangered animals are migrant bald eagles and peregrine falcons. It fails to note bald eagles are not mere migrants to Westwater Canyon WSA. They are permanent residents. Only the North Horseshoe Canyon WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise the findings on terrestrial threatened and endangered species are flawed. The FWS letter (Draft EIS, Appendix 4) indicates the black-footed ferret may inhabit several WSAs (Dirty Devil, Horseshoe Canyon [North and South], Behind the Rocks, Desolation Canyon, Floy Canyon, Spruce Canyon, Flume Canyon, Westwater Canyon, Lost Spring Canyon, and Daniels Canyon). It also indicates the desert tortoise may inhabit Red Mountain and Cottonwood Canyon WSAs. [Utah Wilderness Association]



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

**68.23 RESPONSE:** See the responses to General Comments 9.6, 16.1, and 16.3. It was not the intent of BLM to conduct detailed inventories for all resources within the WSAs, nor was it a prerequisite to do so for the wilderness study effort. Although a substantial amount of information has been gathered that was not previously available, much of the information used in the Final EIS came from existing information available from government agencies, public comment, and various other sources. Much of the data used for threatened and endangered species has been liberally applied. For example, the black-footed ferret is assumed to be located in a number of WSAs because the favorable habitat is present. However, the other necessary ingredient, the prairie dog prey base, is normally nonexistent. Consequently many threatened and endangered species "may occur" within the WSAs, but the likelihood is low.

**68.24 COMMENT:** You accurately surmise that visual resources would suffer with development, yet you feel that sufficient mitigation is possible. You project Class II air quality on most of the area if development occurs, yet you estimate that Class IV air would likely occur on 5,080 acres. We feel that the allowance of Class IV standards on any part of the WSA will cause visual deterioration of the whole to a degree which is unacceptable from an aesthetic standpoint. This would be especially true if development occurred far up any of the southern canyons. [Uintah Mountain Club]

**68.24 RESPONSE:** The commentor confuses air quality class with visual resource classes. The WSA is in a Prevention of Significant Deterioration (PSD) Class II air quality area, but the visual resources include 67,525 in VRM Class II and 5,080 acres in VRM Class IV. Visual impacts are discussed in the Wilderness Values section as impacts on naturalness and special features. Some Class A scenery would be reduced in quality in the disturbed areas. Less than 2 percent of the WSA would be directly disturbed. However, aesthetic values would not be lost in the area as a whole.

**68.25 COMMENT:** BLM's inventory and analysis of impacts on cultural resources is inadequate. [Uintah Mountain Club and Utah Wilderness Coalition]

a. You state that "a complete inventory for historic and prehistoric values in the WSA does not exist." Cultural resources, e.g., cabins, ruins, middens, and rock art, characteristically suffer when roaded ac-

cess is allowed. You correctly identify the potential hazards of development: "Vandalism of sites would be expected to increase in proportion to the general population increase as well as to any increase in roads from mineral and energy exploration and development." What makes you think that you can mitigate the effects of increased access upon cultural resources here, in light of the extreme difficulty the BLM is experiencing in protecting this resource in other areas of southern Utah? Opening the area in any way is asking for trouble and regulatory headaches. We feel that cultural resources may be adversely impacted by your proposed alternative since it excludes from protection two-thirds of the WSA. The nonwilderness land would be open to road-building and vehicular access, subject to the nonwilderness management direction of BLM administrators. Wilderness designation, on the other hand, spells out the protection the land and its resources must be afforded.

b. The risks to cultural resources inherent in BLM's recommendation have not been adequately assessed. It has been estimated that 60 historic sites exist in the Floy Canyon WSA and as many as 30 might qualify for the National Register of Historic Places. In addition, the WSA lies in a border area between two ancient cultures, the Anasazi and the Fremont. BLM recognizes that there is a risk of inadvertent loss or damage to historic and prehistoric sites if the area is not designated as wilderness and development occurs. Since no inventory exists of historic or prehistoric sites in the WSA, the risk to cultural resources posed by any partial wilderness recommendation cannot adequately be assessed. We request that an inventory of cultural resources be completed before the Final EIS so that the potential risk to these resources can be accurately evaluated before final wilderness recommendations are made.

**68.25 RESPONSE:** See the response to General Comment 20.2. Inventories will be completed on a site-specific basis when surface disturbances are proposed on the public land. Mitigation of cultural resources will continue to be BLM's policy when sites are discovered. Losses from vandalism are, as you indicate, less easy to control. Increased loss is more likely as roads improve the accessibility of public lands. See the response to General Comment 20.1.

**68.26 COMMENT:** The cultural resources statement is well done--one of the better analyses. [State of Utah]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

**68.26 RESPONSE:** In the Final EIS, impacts on cultural resources are considered as impacts on special features in the wilderness values analysis. Because of the reduction in anticipated surface disturbances and the limitations of accessibility due to terrain, impacts to cultural values are not considered significant.

**68.27 COMMENT:** The Draft EIS anticipates many archaeological features could be found by primitive recreation users, and Floy Canyon has been called one of the very important cultural areas of the State (see the RDCC Wilderness Subcommittee's Report to the Governor, p. 230). The Final EIS should improve upon the Draft EIS cursory treatment of cultural values in this area. [Utah Wilderness Association]

**68.27 RESPONSE:** See the responses to Specific Comments 68.25 and 68.26.

**68.28 COMMENT:** The East Central Region, Desolation Canyon and the Book Cliffs WSAs (Floy, Coal, Spruce, and Flume Canyons) provide excellent sylvian hiking/backpacking opportunities, combined with opportunities to view deer, elk, and bear. Popularity of this region would increase if a reasonable set of hiking trails was established. We recommend that the entire WSA complex be retained as wilderness, with well defined trailheads and hiking trails providing visitors a unique forest wilderness experience. [Wasatch Mountain Club]

**68.28 RESPONSE:** See the response to Specific Comment 66.9.

**68.29 COMMENT:** Recreational opportunities are recognized as outstanding in this WSA. This is emphasized by many of our members who have backpacked, horsepacked, and hunted the area. We doubt that your visitation figures are very accurate in this case. Hunting is the main use, of course, and Floy Canyon WSA provides a quality experience--one that is becoming increasingly rare in the intermountain west. It is the observation of every serious hunter that the quality of the hunt for big game is inversely related to the proximity of roads and other human intrusions. Some of the best hunting in Utah could be compromised by your proposed alternative. On the other hand, wilderness would enhance some aspects of game management in the southern Book Cliffs. Game animals seem to thrive without "improvements" there. There would appear to be no real conflict between hunting and other recreational uses of wilderness, e.g., backpack-

ing, since seasonal use by the different groups does not generally overlap. Four-wheel drive and ATV use would not be compatible with the qualities you have ascribed to this area of quiet beauty, but you acknowledge that the area is not heavily used or in demand for this purpose now. We believe that visitor use would markedly increase following wilderness designation. It would be very difficult to reliably predict wilderness visitor days or economic benefits at this point, but it is possible that recreation revenues may eventually go a long way toward mitigating the loss of leasing revenues. Close proximity to I-70 makes this area quite attractive for brief and extended trips for the resident and interstate traveler alike. [Uintah Mountain Club]

**68.29 RESPONSE:** The Draft and Final EIS report established that the entire WSA contains outstanding opportunities for primitive and unconfined recreation, and also that hunting is by far the most prevalent recreation activity in the WSA. The entire 72,605 acres within the WSA are in oil and gas leasing Category 2 (standard and special stipulations). Due to the wildlife resources and hunting values, special stipulations are added to each lease which restricts winter use (56,575 acres identified as crucial winter habitat for black bear, cougar, deer, and elk) to protect watershed and wildlife habitat values. Current ORV use is essentially nonexistent in the WSA due to the terrain and its distance from population centers, and none is projected under the alternative scenarios. Visitor use is expected to increase between 2 to 7 percent over the next 30 years based upon recreation information available within the State. Based on information received during the public comment period, annual use within the WSA has been changed from 200 visitor use days to 300. Over the next 30 years, it is expected that up to approximately \$10,700 of local revenues would be derived from recreational use, with or without wilderness designation, whereas oil and gas leasing has the potential to return \$145,210 to the Federal treasury (refer to the Socioeconomics section).

**68.30 COMMENT:** It is stated that in 1982, 1,568 hunter days were spent in the unit. The EIS later states that there are only 200 visitor days per year. Have visitations declined much, or is there an error in the numbers? [State of Utah]

**68.30 RESPONSE:** The 1,568 hunter days was in reference to the southern Book Cliffs area as a whole, which includes more than just the Floy Canyon

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

WSA. The Final EIS has been changed to make it more understandable. Also, due to comments received during the public comment period, current visitor use has been changed from 200 to 300 visitor days per year.

**68.31 COMMENT:** Floy Canyon is the heart of the southern Book Cliffs area. Deleting this area from any wilderness proposal for southern Utah will severely affect wilderness qualities in nearby wilderness lands. [Sierra Club, Cache Group]

**68.31 RESPONSE:** See the response to Specific Comment 68.21. The Final EIS recommends that a 23,140-acre portion of the WSA be designated wilderness. This partial alternative is in the northern portion of the WSA and is adjacent to the Coal Canyon and Desolation Canyon WSAs that have been proposed for wilderness.

**68.32 COMMENT:** You recite a litany of wilderness values for the entire WSA: "outstanding opportunities for solitude," "expansive views and deeply cut canyons," "outstanding sightseeing and photography values," "outstanding opportunities for primitive and unconfined recreation", "hunting opportunities for both large and small game are unique," and "opportunities for hiking, backpacking, and hunting are considered outstanding." And yet you reject two-thirds of the area for wilderness consideration. This is like saying that your wife is a good mother, an excellent cook, beautiful, intelligent, witty, charming, a great lover, a fantastic homemaker, and a true friend, and yet you still intend to divorce her. [Uintah Mountain Club]

**68.32 RESPONSE:** See the response to General Comment 8.6. The southern two-thirds of the WSA has moderate to high potential for oil and gas deposits. Refer to Appendix 11 in Volume I for a summary of BLM's rationale.

**68.33 COMMENT:** Because of UP&L's responsibility to provide electricity for future growth and development in Utah, the proximity of five WSAs in the BLM Proposed Action Alternative to its future steam electric generating stations is of serious concern. No future plants are located in WSAs. Should UP&L's next steam electric plant be one of those listed below, a full EIS would be required as part of the planning process. UP&L is concerned, however, that it would be precluded from building to meet future generation needs in the most efficient and economical manner because of wilderness designation between

now and the time the plant is needed. Future steam electric generating plants may be jeopardized if additional air quality restrictions are placed on future wilderness areas. The plant sites and distances from the nearest WSAs are listed below: [Utah Power and Light]

<u>Plant Site</u>	<u>Distance/Direction</u>	<u>Nearest WSA</u>
Mounds	10 miles/east	67
East Canyon	12 miles/southeast	67
Wellington	25 miles/southeast	67
Gordon Creek	32 miles/southeast	67
Woodside	4 miles/southeast	66
Green River	10 miles/southeast	62
Westwater	5 miles/southeast	72

**68.33 RESPONSE:** See the response to Specific Comment 62.43.

**68.34 COMMENT:** Grand County has less than 1 percent of the State's population. Over 95 percent of the settlement is in the Moab area. Coal is already depressed, with no recent market expansion. Any development will likely spur the economy in the local towns, with the characteristic growth that comes with the harvest of nonrenewable resources. Development benefits are likely to be transient and discontinuous, producing the same painful spasm in local economy, public services, and housing that have been repeated throughout the west. Tax coffers in southern Grand County may fill, but the effect will not be sustainable. Places like Floy Canyon WSA may be sacrificed to this endless cycle of boom and bust. If growth is not directed and monitored, the finest resources in this area--its wilderness qualities and recreational potential--will suffer. We do not trust the private sector to show restraint in most cases. We do not feel that two-thirds of this WSA must be excluded to protect the economic vitality of Grand and adjacent counties. Your Draft EIS should include maps showing the areas of maximum resource potential, with the idea that any development allowed will be prioritized. But don't expect us to believe that 50,000 acres of prime wildlife and recreational land must be sacrificed to less than 1 percent of Utah's population. Another string of boom towns is the last thing Utah needs. [Uintah Mountain Club]

**68.34 RESPONSE:** The Final EIS has been amended to indicate that coal production and any associated impacts, are not projected to occur in the Floy Canyon WSA in the foreseeable future. However, the moderate to high oil and gas reserve potential within the WSA conflicts with the All Wilderness Alternative. Consequently, a 23,140-acre partial alternative in

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

the northern portion of the WSA has been recommended. Refer to Appendix 11 for a summary of BLM's rationale.

**68.35 COMMENT:** You couch the benefits of recreation in economic terms, not in the intangible and non-commercial values these areas will provide to a growing and harried population. These contiguous roadless areas, Coal, Spruce, and Flume Canyons, are in close proximity to I-70, making them an ideal destination from many places in Colorado and Utah. A wilderness area would afford an attractive, convenient, and fascinating backcountry experience for cross-country travelers. With Desolation and Floy Canyon, this roadless area balances the geographic distribution of BLM and other wilderness in Utah. [Uintah Mountain Club]

**68.35 RESPONSE:** See the response to Specific Comment 66.52.

**68.36 COMMENT:** On page 1, the eight State sections total 4,508.61 acres. This will affect the text elsewhere. [State of Utah]

**68.36 RESPONSE:** The comment is noted and the necessary changes have been made in the Final EIS.

**68.37 COMMENT:** Map 1; the State does not own T. 20 S., R. 17 E., Sec. 36. [State of Utah]

**68.37 RESPONSE:** The map has been corrected in the Final EIS.

**68.38 COMMENT:** Page 36, Coal, Paragraph 1: The phrase "22,303 acres would be within the designated area," should read "22,303 acres would be within the nondesignated area." [State of Utah]

**68.38 RESPONSE:** The text in the Final EIS has been corrected.

**68.39 COMMENT:** The five Book Cliffs area WSAs represent 403,660 acres (630 square miles) of geologically similar terrain. "They also are adjacent to the State of Utah South Book Cliffs Designated Roadless Areas of 48,490 acres in the Roan Cliffs, set aside in 1975." If the wilderness inventory had followed BLM policy, unimpacted BLM land forming a contiguous ecosystem would have lead to approximately 650,000 acres of land under wilderness study. [Utah Wilderness Coalition]

**68.39 RESPONSE:** See the responses to General Comment 3.1 and 3.29.

**68.40 COMMENT:** The benefits of designating adjacent areas should be discussed. [John Veranth]

a. In the individual WSA sections, the "size" section states areas are of sufficient size to enhance wilderness values. Why was the additional benefit of the adjacent areas not discussed?

b. This is a large contiguous roadless area consisting of 600,000 acres of BLM land. When adjacent State and Indian roadless lands are included, the potential roadless/wilderness area totals about a million acres. The synergistic benefits of the adjacent areas is not fully addressed in the Draft EIS. This large area would allow human impact sensitive wildlife species to spend the entire year in a roadless area since the elevation range encompasses both summer and winter range. Why was the wildlife benefit not considered in the analysis?

**68.40 RESPONSE:** See the response to Specific Comment 65.14.

**68.41 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which led us to this recommendation. [Exxon Corporation]

**68.41 RESPONSE:** See the response to General Comment 65.5. The proposed Partial Wilderness Alternative would allow for exploration in a portion of the WSA.

**68.42 COMMENT:** The Floy Canyon WSA has moderate wilderness quality values and moderate conflicts compared with the other WSAs in the region.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 68: FLOY CANYON WSA (CONTINUED)**

Conflicts are with coal, other mineral values, and livestock uses which probably would not be reduced except by the No Action/No Wilderness Alternative. High cultural and wildlife values are also present. [State of Utah]

**68.42 RESPONSE:** The quality of wilderness values in the Floy Canyon WSA is discussed in the Final EIS. The impacts of wilderness designation and nondesignation on wilderness values, as well as on mineral development, livestock uses, and wildlife, are analyzed. It is not projected that coal mining will take place in the WSA in the foreseeable future. Consequently, associated impacts are not discussed. Cultural values in this WSA are considered a wilderness special feature. Impacts of wilderness designation and nondesignation on these values are analyzed in the Wilderness Values section of the Final EIS.

**SECTION 69**  
**COAL CANYON WSA**

**69.1 COMMENT:** The numerous inventory violations, including massive acreage reductions and wilderness inventory unit division, make this area a partial wilderness study recommendation at this point. A majority of the conflicts were removed during the inventory in violation of that policy. Our volunteers have done extensive travel through the south and eastern portions of these units checking boundaries and human impacts. BLM extends the vehicle way up Nash Wash beyond the point where the vehicle way is passable, receives regular use, or is maintained. BLM is only allowed to cherry-stem roads. In this case BLM cherry-stemmed about 3 miles of track, some of which is now impassable. BLM should correct the map to reflect the policy on cherry-stemming. BLM should produce documents which validate their decision on this deletion. BLM incorrectly excluded the natural cliff mouth of Sage Canyon, excluding nearly 400 feet of rugged cliff face with no impacts. BLM should move the boundary to the edge of human impacts which end at the base of the cliffs. BLM excluded the natural parts of the cliffs near Corral and Tepee Point. The boundary should be moved to exclude only the impacts. BLM puts the boundary in the middle of the cliff, removing large natural areas from designation. There is no road that separates Spruce Canyon WSA from Coal Canyon WSA. BLM incorrectly shows a road ending up the right fork of Bear Canyon. This

jeep track ends almost 2 miles from the State roadless area. According to inventory policy, the BLM can not divide units except along significant human impacts. In the Spruce Canyon area, BLM deleted the ridge and bottom of Halfway Canyon Canyon from wilderness study. BLM should include this natural area. Also excluded was the natural mountain that separates Cottonwood Canyon and Diamond Canyon. Approximately 900 acres was deleted because of the presence of nearby State lands. No impacts are found in these areas and according to policy, the boundary should include them in the WSA. In the initial inventory, the BLM incorrectly deleted part of the unit (48,480 acres from 100A, 100B, and 100C). In the intensive inventory the BLM dropped 9,240 acres from 100A (all of 100A), 6,300 acres from 100B, and 22,340 acres from 100C. The whole unit needs to be studied together to follow comprehensive planning and study policies. We request that BLM provide detailed description of the legal justifications for the deletions of the areas we described above. With this information and the information we have provided, BLM will see the need to adjust the WSA boundaries to meet inventory requirements. [Utah Wilderness Coalition]

**69.1 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**69.2 COMMENT:** The five Book Cliffs area WSAs represent 403,660 acres (630 square miles) of geologically similar terrain. "They also are adjacent to the State of Utah South Book Cliffs Designated Roadless Areas of 48,490 acres in the Roan Cliffs, set aside in 1975." If the wilderness inventory had followed BLM policy, unimpacted BLM land forming a contiguous ecosystem would have lead to approximately 650,000 acres of land under wilderness study. [Utah Wilderness Coalition]

**69.2 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**69.3 COMMENT:** The Book Cliffs WSAs should be combined into one unit. [Slickrock Outdoor Society, Uintah Mountain Club, Utah Wilderness Association, Dean Petaja, and John Veranth]

a. By creating (fabricating) three separate WSAs, you have fragmented an intact roadless unit with uniform physiography, wildlife, and wilderness values. This is not appropriate.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 69: COAL CANYON WSA (CONTINUED)**

b. We have chosen to make a combined comment on these three Book Cliff units because, in reality, they are one contiguous roadless area with 4x4 roads extending part way up Cottonwood, Diamond, and Preacher Canyons. We recommend they be combined in the final EIS as one Book Cliff unit.

c. Spruce Canyon WSA is one of three contiguous Book Cliffs WSAs that are not separated by any imprints of man. Coal, Spruce, and Flume Canyons WSAs should be recombined to form a single, large Book Cliffs unit. The boundary between Coal Canyon WSA and Spruce Canyon WSA is Cottonwood Creek. A jeep trail exists part way up Cottonwood Canyon but is virtually obliterated before reaching the confluence with Little Twin Canyon. Beyond this point, hiking in Cottonwood Canyon is very enjoyable. Near the head of Cottonwood Canyon, the boundary shoots straight up the mountain to the ridgeline, where no vehicle has ever been. The boundary between Spruce Canyon WSA and Flume Canyon WSA is Diamond Creek. A jeep trail exists part way up Diamond Canyon but is obliterated above the confluence with Halfway Canyon. From this point on, hiking is very pristine and leads to one of the Book Cliff's gems, the beaver ponds, meadows, and glens at the head of Diamond Canyon. Obviously, there are no imprints separating the Coal, Spruce, and Flume WSAs and they should be recombined to form a nearly 150,000-acre Book Cliffs unit.

d. What is the justification for treating the areas as separate WSAs?

e. BLM's divide-and-conquer strategy separated what was once the Cottonwood Canyon WSA. On the ground, in fact, they are not separate. The lower section of Cottonwood Canyon has an old jeep trail and the extremely lower portion has seen oil and gas activity in the past. There has been no activity (oil and gas) for years. Why not "cherry-stem" the impacted area and close the old jeep trail past that point. Oil and gas favorability is rated as low for this area which seems to be born out by the fact that the Cottonwood Canyon wells did not produce. Yet in the face of extremely high wildlife values, BLM recommends No Action/No Wilderness. Admitting that the No Action Alternative could result in total loss of habitat, BLM arrogantly assumes the wildlife can find other habitat. Where in Utah can wildlife go? BLM needs to take responsible, resource-based action and recommend All Wilderness for all the Book Cliffs units. The same arguments discussed above apply equally to Flume Canyon; recommend All Wilderness.

**69.3 RESPONSE:** See the response to General Comments 3.1 and 3.29. Impacts resulting from the presence and use of existing roads in the Book Cliffs area are not significantly different whether the roads are cherry stemmed into a WSA or form a boundary between the WSAs. Further, BLM does not assume that implementation of the No Action/No Wilderness Alternative would automatically result in a "total" loss of wildlife habitat. The wilderness values of the Book Cliffs area, including wildlife habitat, are recognized. Therefore, BLM has proposed in the Final EIS that 75,145 acres be designated wilderness. This includes partial wilderness designation for the Floy Canyon, Coal Canyon, Spruce Canyon, and Flume Canyon WSAs. This is an increase of 52,005 acres over that proposed in the Draft EIS. With this new proposal, wilderness would extend across the length of the Book Cliffs area and into Desolation Canyon.

**69.4 COMMENT:** BLM incorrectly interprets court rulings on access to mandate road construction. BLM ignores the State policy to exchange State in-holdings in areas recommended for wilderness.

**69.4 RESPONSE:** See the responses to General Comments 6.1 and 6.3.

**69.5 COMMENT:** "In-held State sections and numerous pre-FLPMA leases would hinder manageability of the area as a wilderness." The same comments made on UT-060-100B also apply here.  
[Utah Wilderness Coalition]

**69.5 RESPONSE:** The Final EIS projects access to three of the in-held State sections for mineral exploration and development purposes. Also six post-FLPMA oil and gas leases are located in the WSA. Exploration and development of these leases is projected for both wilderness and nonwilderness designation. The potential impacts to wilderness values from these actions are analyzed in the Wilderness Values section.

**69.6 COMMENT:** This area has had popular support for wilderness in the past. BLM should remember the appeals that conservationists used before to further the wilderness process for Coal Canyon. [Sierra Club, Cache Group]

**69.6 RESPONSE:** See the response to Specific Comment 69.3. BLM recognizes that the Book Cliffs area has popular support for wilderness designation. Approximately 75,145 acres in the Book Cliffs have been proposed for wilderness in the Final EIS (an

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 69: COAL CANYON WSA (CONTINUED)**

increase of 52,005 acres over the Draft EIS). Other interest groups have also expressed interest in the Book Cliffs. These include energy companies, local citizens, etc.

**69.7 COMMENT:** This area is so remote and rugged that it is largely unexplored!! The Draft EIS even admits this: ". . . it is probable that scenic and archaeological features not mapped or named could be found by wilderness users." This not only means that your agency, the nation's largest absentee landlord, has never bothered to survey this land for its scenic or archaeological values! Have you ever even been there? The logical corollary to that is that you are making a nonwilderness recommendation based on nothing but your own anti-wilderness biases. Why are these WSAs not included in your wilderness recommendations? I challenge you to give all of us a direct answer that is not couched in bureaucratic double-speak and glittering generalities. The Draft EIS states that these WSAs have "negligible potential" for minerals and that the terrain is so incredibly rugged that even if any mineral discoveries were made, mineral recovery would be "infeasible." There is absolutely no valid reason for not designating the entire 135,000-acre Book Cliffs roadless area as wilderness. I most certainly hope that this pristine and wild, wildlife habitat and recreation area will be included in your wilderness recommendations in the Final EIS. [Scott DeLong]

**69.7 RESPONSE:** See the responses to Specific Comments 66.20 and 68.4. Also, see Appendix 11 in Volume I for a summary of the rationale for BLM's Proposed Action. BLM has proposed partial wilderness designation for the Coal Canyon WSA, which is a modification from the Draft EIS.

Based on several minerals studies, the Coal Canyon has been determined to have high potential for oil and gas resources. Portions of two known oil and gas fields cover 7,209 acres of the WSA. A major oil and gas field is located 10 miles southeast of the WSA. Leasing and drilling activity have been high in the vicinity of the WSA (see Mineral and Energy Resources section for details). Therefore, the WSA has a high potential for mineral exploration and development.

**69.8 COMMENT:** The old jeep trails on which the areas are divided are scarcely used and are being naturally revegetated, and there is scant sign of human activity, certainly none permanent, in this rugged, wonderful, wild area. Wildlife values are ex-

tremely high, due to the remoteness from large population centers, the dissected and tumbled terrain, the good water in the canyons, and the light human intrusions. The wilderness experience is absolutely incomparable. BLM has used oil, gas, and coal as a reason to exclude these areas from consideration, yet the possibility of coal development is not good, and oil and gas potential is described as "low" in the Draft EIS. We believe that high quality wilderness values are being ignored in favor of relatively low quality mineral potential. The northern Book Cliffs are riddled with roads and well sites. Why subject the finest wildlife habitat in the State to potential degradation or destruction, when far superior oil, gas, and coal potential can be found elsewhere? [Uintah Mountain Club]

**69.8 RESPONSE:** See the responses to Specific Comments 69.3 and 69.7. It is important to note that BLM does not project that coal will be developed in the Se-go coal field in the foreseeable future. The WSA does have a high value for oil and gas resources.

**69.9 COMMENT:** BLM didn't even allow WSA status for this region. This is very important deer, elk, and bear habitat. Energy development isn't likely here ever, and deposits aren't major anyway. The importance of this area is high; it should be saved. BLM's claims that the area shouldn't be wilderness because it's too rugged for hiking are asinine--there is more to wilderness than trails for human use. [Eric Johnson]

**69.9 RESPONSE:** See the response to Specific Comment 69.3. Also, see Appendix 11 for a summary of the rationale for the BLM Proposed Action. Assuming the premises of the comment, there would also be little or no threat to wilderness values. BLM has proposed partial wilderness designation to protect portions of the WSA from potential development.

**69.10 COMMENT:** The Desolation should be expanded past the southern confluence with the Price River on the east side of the Green River. The southern portion of Floy Canyon should also be recommended wilderness. The Desolation/Floy/Coal/Spruce/Flume Canyons along with the State roadless area and the Hill Creek extension could compromise the largest and best BLM wilderness in the State and could be renamed the Book Cliff-Desolation Wilderness. [D. Kennell]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

**69.10 RESPONSE:** See the responses to General Comments 3.1 and 3.29 and to Specific Comment 69.3.

**69.11 COMMENT:** The 61,000-acre Coal Canyon proposal of the Utah Wilderness Coalition is all within the 61,430 acres of the WSA. This Book Cliffs roadless area extension contains many significant wilderness qualities. From the Draft EIS, it is difficult to tell why BLM does not recommend this roadless area for wilderness. [Sierra Club, Cache Group]

**69.11 RESPONSE:** See the response to General Comment 3.1. Also, see Appendix 11 in Volume I for a summary of the rationale for BLM's Proposed Action. A partial wilderness designation has been proposed for the Coal Canyon WSA which would preserve the best wilderness values in the WSA and eliminate the great-est resource conflicts.

**69.12 COMMENT:** The dropping of Book Cliffs has been purely political to this point because of some local opposition perhaps, but Congress is the place for politics, not in BLM. BLM should find all these WSAs and Desolation Canyon as suitable and have the GS/BM reports completed. They have the most outstanding wilderness values in the State of Utah, and they have already shown they are very valuable for that use. [George Nickas]

**69.12 RESPONSE:** See the responses to General Comment 8.6 and Specific Comments 66.21, 69.6, and 69.11. In the Final EIS, BLM's Proposed Action for the Coal Canyon WSA is a Partial Wilderness Alternative. A USGS/USBM report has been requested for the proposed area.

**69.13 COMMENT:** There does not appear to be any logic on how BLM selected its Preferred Alternative of 1.9 million acres. I fully agree and support that the entire 1.9 million acres be designated wilderness because they exhibit exceptional wilderness characteristics. However, I don't understand why additional WSAs that exhibit the same wilderness qualities which should be recommended as wilderness are not. An example is the Book Cliffs area. While living in Vernal, I have spent considerable time exploring the Book Cliffs area. Spruce Canyon WSA, Flume Canyon WSA, and Coal Canyon WSA should all be included as wilderness recommendations. Your own Draft EIS states "likelihood of development is moderate to low"; "the large size and blocky configuration of the WSA contribute to a feeling of vastness, and the rugged tem-

porary and isolated nature provide outstanding opportunities for the visitor to find solitude"; "primitive and unconfined recreation opportunities are present uniformly throughout the WSA"; and that "the WSAs cover part of an area of critical watershed and provides habitat for big game animals that shy away from areas of human occupation." Yet these three WSAs are not recommended for wilderness. Nor is there given any reason why they are not recommended for wilderness. Why are Spruce Canyon, Coal Canyon, and Flume Canyon WSAs not recommended for wilderness designation? [D. Kennell]

**69.13 RESPONSE:** See the responses to General Comments 8.2 and 8.6 and Specific Comment 69.6.

**69.14 COMMENT:** These WSAs are not recommended as wilderness in the BLM "Proposed Action" and should be recommended as wilderness. In the Draft EIS BLM admits development potential in these areas is moderate to low, that the areas are extremely important to wildlife, important as watersheds, have valuable cultural resources, and the areas are isolated, rugged and provide outstanding wilderness characteristics. The areas are highly erosive in nature and would be extremely difficult to develop without creating unexceptable resource damage. In addition, these areas are immediately adjacent to a State roadless area and the Hill Creek extension of the Ute Indian Reservation which are being managed as wilderness. [D. Kennell]

**69.14 RESPONSE:** See the responses to Specific Comments 69.3 and 69.17. BLM has reviewed and updated the resource information in the Draft EIS.

**69.15 COMMENT:** BLM should propose the All Wilderness Alternative for this WSA. [Utah Wilderness Association and John Veranth]

a. BLM's recommendation for no wilderness is a tragedy. The Draft EIS recognizes the WSA's extremely high wilderness values and "low" potential for development. The OIR (2+) is a good indication of how insignificant the mineral values of the WSA really are. This rating is lower than much smaller WSAs that have been recommended for wilderness. No WSAs have more important wilderness values than the Book Cliff units. The oil and gas potential is low (f2) and none of the WSA is leased for coal. Only 13,000 acres are thought to contain recoverable coal. This coal resource is a miniscule amount of the recoverable coal in Utah, and is absolutely insignificant to the



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 69: COAL CANYON WSA (CONTINUED)**

State. The local economy is not one bit dependent upon coal development, therefore the All Wilderness Alternative would have no impact on the status quo.

b. These areas include crucial habitat for elk, bear, and cougar. Also, the areas have high scenic value due to both nearby rock formations and deep canyons and due to the vistas of a huge area to the south ranging from Grand Mesa to Navajo Mountain. The low to moderate mineral potential does not justify a nonwilderness recommendation.

**69.15 RESPONSE:** See the response to Specific Comment 69.3. Also see Appendix 11 in Volume I for a summary of the rationale for the Proposed Action.

Based on several mineral studies, the Coal Canyon WSA has been determined to have high potential for oil and gas resources. Portions of two known oil and gas fields cover 7,209 acres of the WSA. A major oil and gas field is located 10 miles southeast of the WSA. Leasing and drilling activity have been high in the vicinity of the WSA (see the Mineral and Energy Resources section for details). Even though a substantial coal resource is present in the WSA (Sego coal field), BLM does not believe that the coal would be developed in the foreseeable future due to more favorable resources located elsewhere.

BLM recognizes the important wildlife habitat located in the WSA. It is discussed and analyzed in the Wildlife Resources sections of the EIS.

**69.16 COMMENT:** BLM fails to consider the manageability of this area with development. Protection of sensitive values appear impossible under the present limitations on the agency in implementing resource protection programs. Stated policy shows strong resource development conflicts. [Utah Wilderness Coalition]

**69.16 RESPONSE:** Manageability of the WSA as wilderness is addressed for all alternatives in the Impacts on Wilderness Values section. The ability or inability to manage the area as wilderness was considered in identifying resource conflicts and impacts to wilderness values. Benefits to wildlife species from wilderness designation of Coal Canyon WSA as part of a large wilderness system are addressed. Proper management of sensitive resources in the Book Cliffs area is of concern to BLM. However, there are many options other than wilderness designation available to manage sensitive values. Management of these values

has been addressed in the Grand RMP. Many values are already guided by existing laws, rules, and regulations. For example, threatened and endangered species are covered by the Endangered Species Act. Cultural resources are protected by existing laws and regulations. BLM recognizes that significant wilderness values are present and has proposed that 75,145 acres be designated wilderness in the Book Cliffs area.

**69.17 COMMENT:** The benefits of designating adjacent areas should be discussed. [John Veranth]

a. In the individual WSA sections, the "size" section states areas are of sufficient size to enhance wilderness values. Why was the additional benefit of the adjacent areas not discussed?

b. This is a large contiguous roadless area consisting of 600,000 acres of BLM land. When adjacent State and Indian roadless lands are included, the potential roadless/wilderness area totals about a million acres. The synergistic benefits of the adjacent areas is not fully addressed in the Draft EIS. This large area would allow human impact sensitive wildlife species to spend the entire year in a roadless area since the elevation range encompasses both summer and winter range. Why was the wildlife benefit not considered in the analysis?

**69.17 RESPONSE:** See the response to Specific Comment 65.14.

**69.18 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**69.18 RESPONSE:** Additional information has been added to the Final EIS concerning these resources.

**69.19 COMMENT:** We feel that sediment load from even modest road construction and site preparation would result in unacceptable degradation of water quality in the Book Cliffs WSAs. Continued activities on-site, especially with ongoing mining activities or the establishment of oil and gas "fields," would likely cause continued erosion in this up-and-down canyon country. In the canyons with perennial streams, beaver dams--nature's own "instream drop structures"--would certainly be affected. Don't meddle. If there is to be soil loss, let it be under the All Wilderness Alternative. [Uintah Mountain Club]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

**69.19 RESPONSE:** See the response to Specific Comment 66.31. The Proposed Action alternative projects approximately 579 acres of surface disturbance in the foreseeable future. About 86 percent of this acreage (500 acres) would be vegetation treatments (prescribed burns and seeding). These treatments would improve water quality and lessen soil erosion. The proposed watershed treatment structures (retention dams, gully plugs, etc.) would also aid water quality. The remaining 79 acres amount to less than 1 percent of the WSA and would not cause significant impacts to water quality or increases in soil erosion.

**69.20 COMMENT:** Exxon believes each of these areas contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist, and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which led us to this recommendation. [Exxon Corporation]

**69.20 RESPONSE:** See the response to Specific Comment 65.5. The proposed Partial Wilderness Alternative would allow for exploration in a portion of the WSA.

**69.21 COMMENT:** The area is known for oil and gas production. The same data used for WSA UT-060-100B (Flume Canyon) repeats itself in the Draft EIS for this area. As for 100B (Flume Canyon) BLM overstates the oil and gas development potential. No production figures are given supporting their opinion. Refer to our comments on the adjacent WSA for additional information. [Utah Wilderness Coalition]

**69.21 RESPONSE:** See the responses to Specific Comments 69.15 and 71.23.

**69.22 COMMENT:** Coal deposits are described as a conflict with wilderness designation. Part of the WSA lies within a portion of the Se-go coal field. BLM

claims that only 690 acres would be disturbed by coal development. BLM needs to show which parts of the area are involved on a map. BLM should develop an alternative which excludes this resource. BLM failed to apply the alternatives described in Volume I. If they had done so, there would have been a Partial Wilderness Alternative considered. [Utah Wilderness Coalition]

**69.22 RESPONSE:** See the responses to Specific Comments 69.8 and 69.15.

**69.23 COMMENT:** Dry holes at the Bogart Canyon site and other sites around the Book Cliffs should convince oil companies that no profit is to be made there. These findings support conservationist claims that wilderness is the most appropriate land use for the WSAs in this region. BLM should deny further leases and exploration claims on Book Cliffs WSAs (Turtle Canyon, Floy Canyon, Coal Canyon, Spruce Canyon, and Flume Canyon), which have already been extensively explored, and recognize the paramount wilderness attributes of these areas. [Wasatch Mountain Club]

**69.23 RESPONSE:** See the responses to General Comment 15.1 and Specific Comments 68.8, 68.13, and 69.15. A moderate to high moderate certainty exists that the WSA contains between 10 and 50 million barrels of oil and 60 and 300 billion cubic feet of gas. Anticipated production from this area will mainly be found in pools formed by stratigraphic traps and not structural closures. Stratigraphic traps are usually more difficult to discover and require more exploration and drilling before discovered. Based on new data, the Minerals sections in the Final EIS has been changed to reflect an increased favorability for oil and gas in the WSA.

**69.24 COMMENT:** In Coal Canyon, no wells have produced. BLM describes the development potential as "low." The Draft EIS does not provide a site map featuring KGSs or the relative extraction potential for different sites in the area. You do not show the location of pre- and post-FLMPA leases, but you describe 21,672 acres as post-FLMPA-leased, with special stipulations, and 17,508 acres as not leased. This brings the total acreage that would likely not be developed to 39,180 acres--almost 40,000 acres. This is 64 percent of the WSA, yet you reject wilderness designation for the entire unit. Why? Three million of 10 million barrels of oil is recoverable from "small, relatively shallow fields." Only 18 million of 60

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

million cubic feet of gas is described as "recoverable." For this, apparently, you would sacrifice the entire wilderness resource. You do not specify when the last pre- and post-FLMPA leases are expected to expire. [Uintah Mountain Club]

**69.24 RESPONSE:** See the responses to Specific Comments 69.5, 69.15, 69.16, and 69.23. No expiration date for pre-FLPMA leases in the WSA has been established. These leases are either in an oil and gas unit or are being held by production and will not expire so long as the wells are capable of producing in paying quantities. The mineral favorability rating as determined by Scientific Application, Inc. (SAI) refers only to the estimated size of the resource and not to the development potential of the resource. Maps of the locations of oil and gas units and KGSS are available for inspection at the Utah State Office and various District Offices. The recovery rates discussed in the text are a general industry-wide average. The actual would vary from site to site.

**69.25 COMMENT:** Together, the Coal, Spruce, and Flume Canyon WSAs are estimated to have about 9 million bbl of recoverable oil and 54 billion of natural gas, recoverable from small, scattered fields. To put this in perspective, this represents about 0.04 percent of all the proven natural gas reserves in the U.S. (in 1979), or enough oil to supply the needs of the U.S. for about half a day. Roading and well sites have the potential for being extremely disruptive to sensitive species, reducing crucial habitats during periods of disturbance (Coal Canyon). We feel that BLM should not make exploration and development attractive by releasing these areas from the constraints of wilderness management. These areas could be irrevocably altered, and another piece of American wilderness forever lost. [Uintah Mountain Club]

**69.25 RESPONSE:** See the responses to General Comments 3.1 and 15.1 and Specific Comments 69.15 and 69.20. The amount of energy resources thought to be located in the Utah WSAs is discussed on a nationwide perspective in Volume I. Anticipated impacts from energy and mineral resource exploration and development in the Coal Canyon WSA have been analyzed and documented in the text of the Final EIS.

**69.26 COMMENT:** There are no coal leases in these WSAs. This reflects the grade of coal there, the availability of coal elsewhere, and the feasibility of recovery. The coal in Flume Canyon WSA is described as "very poor quality." Only 22 percent of the Coal Can-

yon acreage is considered to have recoverable coal. The 38 million tons of recoverable coal in Coal Canyon is only about 0.5 percent of Utah's total coal reserves. In Spruce Canyon WSA you say that "oil, gas, tar sand, coal . . . likely would not be recovered." Potential exists for small amounts of coal--5 to 30 million tons (page 8). "Low tonnage" of coal exists in Flume Canyon WSA, with production unlikely." An optimistic estimate of recoverable coal in these three WSAs amounts to about 2 percent of Utah's total coal reserves. In the analysis of these WSAs, nowhere do you include a map demonstrating KRCRAs. The reader cannot possibly surmise just where possible conflicts exist. In all cases, you correctly point out that "the loss of development would not be significant." In the Spruce Canyon analysis, you point out the potential hazards to water resources from coal mining: "If an underground coal mine is developed, geologic formations could be fractured, affecting ground water by aquifer bleeding. Springs, if located in the WSA, could dry up or experience reduced flows." In an area where dependable water resources and perennial flow is essential for wildlife and grazing, it is highly inadvisable to allow any development to proceed that would jeopardize this resource. The coal resource is just not that important now. We won't even discuss the inadvisability of strip mining. The negative impacts should be obvious; strip mining should be prohibited at all cost. [Uintah Mountain Club]

**69.26 RESPONSE:** See the responses to Specific Comments 69.3, 69.8, and 69.15. It is also important to note that even if coal were to be developed, it would not be developed by surface mine methods. Deep mining is the only possible method of coal extraction in the Book Cliffs area. However, BLM does not project any coal development in the foreseeable future even with the No Action/No Wilderness Alternative.

**69.27 COMMENT:** The Draft EIS is unclear in many aspects. The location of KGSS and KRCRAs is not shown. The location and description of leases (pre- or post-FLPMA) is not provided. One or two small maps would have sufficed. Thus, it is impossible for the citizen reviewing the document to see specific areas of potential conflict, and thereby suggest other alternatives to the two that you have advanced: No Action and All Wilderness. [Uintah Mountain Club]

**69.27 RESPONSE:** See the response to General Comment 26.1. Designating a portion of the Coal Canyon WSA would preserve many of the area's

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

wilderness values while excluding the area most likely to be developed for mineral and energy resources. A Partial Wilderness Alternative is analyzed in the Final EIS.

**69.28 COMMENT:** In the Book Cliffs field, several WSAs (Spruce, Flume, Floy, and Coal Canyons) contain coal deposits. USGS investigations of Floy Canyon WSA, typical of these WSAs, indicate that the coal seams are too thin (less than 4.5 feet) to be economically recoverable. [Utah Wilderness Coalition]

**69.28 RESPONSE:** See the responses to Specific Comments 69.8 and 69.26. Coal development is not projected in the WSA in the foreseeable future.

**69.29 COMMENT:** BLM is placing the importance of the potential development of a marginal oil and gas resource above the importance of preserving an outstanding and unique wilderness and wildlife resource. Just how important is the potential oil and gas resource in these three WSAs? In their summary of significant environmental consequences for each of these units, BLM indicates that due to the low likelihood of recovery, the collective loss of development of gas and oil resources within these WSAs would not be significant! Yet the threat of losing the opportunity to extract these insignificant quantities of fossil fuels is "driving" the decision to not recommend unquestionably deserving wildlife and critical wildlife habitat for wilderness. This situation is especially absurd, when one realizes that there is ample opportunity to develop far more favorable energy leases outside the WSAs in the Book Cliffs. It is highly unlikely that any American will ever receive one Btu of benefit from fossil fuels from within the boundaries of these WSAs and yet without designation as wilderness, motorized activities associated with mineral exploration, ORV use and livestock development will, over time, compromise the outstanding wilderness and wildlife resources over much of these WSAs. [Slickrock Outdoor Society]

**69.29 RESPONSE:** See the responses to Specific Comments 69.3, 69.5, 69.8, and 69.15.

**69.30 COMMENT:** Why is San Arroyo gas production only summarized through 1974? [Brian Wood]

**69.30 RESPONSE:** The gas production figures for the San Arroyo field have been updated through the year 1984.

**69.31 COMMENT:** In view of the extremely high wilderness quality of this area including Utah's best black bear habitat and lack of serious conflicts throughout a majority of the area, wilderness designation is warranted. The absence of the required wilderness resource inventories matched with the interest in mineral inventories indicates an unbalanced analysis of this area. Missing are the required inventories on rare and endangered species, archaeological features, visual resources, recreation activities, and wildlife. Missing is analysis of the impacts of massive development on sensitive biotic values including elk, deer, bear, and cougar habitat. Also missing is analysis of the major road construction proposed on fragile soils and watersheds. BLM failed to adequately consider the multiple resource benefits from designation of wilderness in protecting numerous resources. [Utah Wilderness Coalition]

**69.31 RESPONSE:** See the responses to General Comments 9.6, 13.1, 16.2, 16.3, 20.2, and 22.1.

**69.32 COMMENT:** Cottonwood and Diamond Creeks are perennial streams that have potential for supporting a population of trout for wilderness users. [Utah Wilderness Coalition]

**69.32 RESPONSE:** Trout populations are currently not found in Cottonwood and Diamond Creeks. The potential for supporting a viable trout population is unknown. It is known that at one time, Diamond Creek contained brook trout that were planted by local sportsmen. However, in the early 1960s a flash flood flushed the entire drainage and trout have not been observed in the creek since that time. It is the responsibility of UDWR to determine if it is in their best interest to stock these streams and try to maintain a fishery. UDWR tentatively plans to assess these streams and determine potential for trout habitat. An exact date for this study has not been set.

**69.33 COMMENT:** BLM proposes in the No Wilderness Alternative to designate this area open to all off-road vehicles. This conflicts with management of critical elk winter range, fragile soil protection needs, and critical watershed values. Wilderness designation would offer these multiple use benefits. [Utah Wilderness Coalition]

**69.33 RESPONSE:** Implementation of the No Action/No Wilderness Alternative would result in the area being managed as authorized in the Grand RMP (USDI, BLM, 1985). The Grand RMP left the WSA open

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

to ORV use. The rationale for doing this was based on the fact that the area does not have ready access and is so steep and rugged that the terrain by itself limits the use of ORVs. ORV use is not a significant impact in the WSA.

**69.34 COMMENT:** BLM vastly understates the impacts of development on sensitive wildlife populations. Since BLM has not performed wildlife populations, archaeological, and endangered species inventories, no possible cumulative impact analysis is possible. The measured loss of the resources and other due to the cumulative impacts from fossil industry development (from population growth, industrial sites and exploration, and from ORV growth) are not discussed. [Utah Wilderness Coalition]

**69.34 RESPONSE:** See the responses to General Comment 9.6 and Specific Comment 69.31.

**69.35 COMMENT:** This very wild WSA contains important habitat for mountain lion, bear, and elk which can best be protected through wilderness protection. [Sierra Club, Cache Group]

**69.35 RESPONSE:** See the response to Specific Comment 69.3. The presence of these species and their habitats is discussed in the Final EIS.

**69.36 COMMENT:** If the proposals for these WSAs were not so serious in their consequences they would be laughable! These areas are not really three separate areas at all--they are one large 135,000-acre roadless wilderness area. How can you claim that this is not wilderness?! Any wildlife biologist would laugh at your claims! The Draft EIS itself points out that this is one of the most pristine and important wildlife habitats in the entire State of Utah! These WSAs favor wildlife because of their relative lack of human impacts." Relative to what--the face of the moon!? These areas are crucial big game habitat for black bear, cougar, and elk; animals that even your own Draft EIS admits are "very sensitive to human intrusion." I have read the entire Draft EIS, a very dismal task, and believe that this is the only BLM wilderness that contains black bear. [Scott DeLong]

**69.36 RESPONSE:** See the responses to General Comments 3.1 and 3.29 and Specific Comment 69.3. Black bear is believed to occur in the Jack Canyon, Desolation Canyon, Floy Canyon, Coal Canyon, Spruce Canyon, and Flume Canyon WSAs. The Book Cliff area is not the the only black bear habitat in Utah. The

text notes that black bear, elk, and mountain lion exist in the WSA.

**69.37 COMMENT:** These areas support an impressive variety and number of species. Food, cover, and water are abundant. This is indispensable wildlife habitat. Large areas of these WSAs are considered "crucial" year-round habitat and winter range. An inconsistency appears here. In the Draft EIS, Coal Canyon WSA is identified as having 95 percent of its acreage as "crucial" winter range, with 2,457 acres as "crucial" year-round habitat for deer, elk, and mountain lion. Spruce and Flume Canyon WSAs have no areas identified as "critical habitat." Yet the physiography of the regions is practically identical and the contiguous WSAs are separated by deeply eroded canyons and rugged relief which obviously limit east-west migration. Put another way, why should the 58,173 acres of Coal Canyon WSA be "crucial" winter range to the 40 elk that winter there, while the 80 elk that winter in Spruce Canyon WSA and the 40 elk that migrate to Flume Canyon WSA have no "critical habitat?" We suspect that all three WSAs have large segments of critical habitat. Seasonal migration takes place largely along the generally north-south trending canyons, from higher to lower elevations and back again. In winter, animals stay in the deeply-wooded canyons, by perennial watercourses, and off the exposed ridgetops. The assignment of "no critical habitat" in Spruce and Flume WSAs does not meet the test of reasonableness, when a contiguous and physically similar WSA is practically covered with "crucial" winter range. Another inconsistency appears in the Spruce and Flume Canyon WSA analyses, when you state that, "the entire WSA provides crucial habitat for species that are very sensitive to human intrusion, including elk, bear, and mountain lion" (Flume Canyon). Yet, in the same paragraph, you state that there is "no critical habitat" in the WSA. What is the difference between "critical" and "crucial"? The Glossary doesn't identify this distinction. My thesaurus does not distinguish between the two words. Spruce Canyon has the same "sensitive" species as the other two WSAs, but, oddly enough, has no "crucial" or "critical" habitat. We find these inconsistencies very difficult to digest. In point of fact, Utah Division of Wildlife Resources ascribes crucial habitat to the entire southern and eastern Book Cliffs, reflecting the fact that these areas represent the finest, least-impacted wildlife habitat in the State. [Uintah Mountain Club]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

**69.37 RESPONSE:** The text of the Final EIS has been revised to clarify the status of wildlife habitat in the Coal Canyon, Spruce Canyon, and Flume Canyon WSAs. The "crucial" habitat listed in the Draft EIS for these WSAs was incorrect.

The majority of elk and deer on the Book Cliffs are concentrated on the Indian lands and in the State roadless area above the WSAs. When these animals move from their summer range to winter range, they follow the north-south trending ridges. Due to the ruggedness of the area, there are limited places where they can negotiate the cliffs. This tends to concentrate them in one or two of the WSAs. Many of the elk and deer that summer in or near Spruce and Flume Canyons migrate to the north toward Vernal, Utah. However, in many instances the animals migrate to the lower habitats outside of WSAs. The definitions of crucial and critical habitat are discussed in the Glossary located at the back of Volume I.

**69.38 COMMENT:** You correctly point out the unique nature of the resource and possible adverse effects of development (Coal, Spruce, and Flume Canyons). You also point out the development pressures which now exist in other areas of the Book Cliffs, and the compounding effect that additional development would have if allowed to occur in these WSAs. Yet you fail to take the next logical step, by concluding that if habitat for sensitive species is to be maintained in a time when pressures on wildlife are ubiquitous and unrelenting, then these three special areas must be saved en block from future development. You have sided with development, pure and simple. You assume that pressured animals will just go "over the hill." You don't acknowledge a simple ecologic fact; that all habitats are not created equal. The habitat that will likely be impacted most will be the riparian zones and canyon bottoms at lower elevations--critical areas to most large over-wintering wildlife. Your failure to address the needs of wildlife by simply writing off the effects of development is either callous, uninformed, or disingenuous--or a combination of all of these. No attempt is made to identify the relative importance of this resource in Utah, and, aside from citing "stipulations," we are not told how BLM intends to protect the resource." We feel that wilderness designation is the best way to protect the Book Cliffs wildlife. Legislative protection leaves little room for broad interpretations or diverse managerial philosophies. With resource preservation, perhaps we won't wind up with the "mess" that occurred in the northern part of the Book Cliffs. If you want an

idea of how important habitat preservation can be, we recommend that you talk to folks who hunted the northern Book Cliff several years ago. For some species, "peaceful coexistence" just doesn't occur with extensive roading and site development. [Uintah Mountain Club]

**69.38 RESPONSE:** See the responses to Specific Comments 69.3, 69.7, 69.11, and 69.37.

**69.39 COMMENT:** Probably the biggest tragedy in the whole BLM wilderness review in Utah, is BLM's recommendation of only 23,000 acres in over a quarter million acres of wilderness land in the eastern Book Cliffs. BLM recognizes in the EIS that virtually this entire quarter million acres of land is crucial habitat for elk, black bear, and cougar. The reason it's crucial is because it's all that's left roadless in the Book Cliffs. It's amazing where these species have been driven. It's especially crucial for black bear. It's probably the last stronghold in the State of Utah for black bear. The reason that all of these areas have been left out of the review is again potential oil and gas development. BLM should have all of the information they can get on these areas before they make a recommendation to Congress. These areas that are omitted in the eastern Book Cliffs have recognized high wilderness values. BLM recognized they may be the highest wilderness values in the State of Utah, and yet by recommending as unsuitable now, BLM eliminates the opportunity for these areas to have the USGS/USBM studies that will be done on all the suitable areas. There is no reason not to recommend these areas as wilderness at this stage in the process. BLM admits that all of the information on the oil and gas resource is highly speculative. It may or may not exist in this area. The decision to level those areas out is purely political. At this state, BLM should base their decisions on resource data, make sound resource decisions, and leave the politics to Congress. That's why Congress has reserved the right for themselves to make final determination on wilderness areas. [George Nickas]

**69.39 RESPONSE:** See the responses to General Comment 8.6 and Specific Comments 68.21 and 69.36.

**69.40 COMMENT:** The assessment of impact for Spruce Canyon states that in the event of noncompatible development, sensitive animals, quote, "could move into adjacent areas because the WSA encompasses only a small portion of recognized habitat for

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 69: COAL CANYON WSA (CONTINUED)**

these species." This is unlikely. It is more likely that the suitable habitat for this species exists in the adjacent areas and is already saturated by local populations. Furthermore, the BLM proposal recommends nondesignation for all of the Flume Canyon WSA bordering on the north and east and the Coal Canyon WSA bordering on the south. In this case, BLM should either redesignate the adjacent WSAs or redo this statement giving much more consideration to the effects of nondesignation on wildlife values. [Richard Frederickson]

**69.40 RESPONSE:** See the responses to Specific Comments 69.3 and 69.37.

**69.41 COMMENT:** The areas I am particularly concerned with are Jack, Desolation, Turtle, Floy Coal, Spruce and Bruin Canyons. BLM has looked at mineral values and considered mineral values versus wilderness values. I think probably BLM is supposing a little too much in the mineral area. Maybe I can illustrate with a case in point. The Book Cliffs area and the Desolation Canyon area include some of the most rugged and remote country in Utah. These places have wildlife: black bear, bighorn sheep, mountain lion, deer, and elk. You can grow deer most anywhere. You can grow elk in a lot of places. But, there really aren't very many places where you can get a good population of bear and lions. The only reason that they were not recommended that I can figure out is their low to moderate potential for mineral development. Even if they had great potential for mineral development, the potential for wildlife and wilderness experiences are greater. [J. Barnett]

**69.41 RESPONSE:** See the responses to General Comments 8.14 and 8.16. Both the wildlife and mineral values of the WSA are addressed and analyzed in the EIS. Rationale for BLM's Proposed Action are summarized in Appendix 11 in Volume I.

**69.42 COMMENT:** Threatened and endangered species are summarily dismissed. The Draft EIS Volume I notes no terrestrial threatened and endangered species are found in WSAs and the only nonaquatic threatened and endangered animals are migrant bald eagles and peregrine falcons. It fails to note bald eagles are not mere migrants to Westwater Canyon WSA (they are permanent residents). Only the North Horseshoe Canyon WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise, the findings on terrestrial threatened and endangered species are flawed. The FWS letter (Draft EIS,

Appendix 4) indicates the black-footed ferret may inhabit several WSAs (Dirty Devil, Horseshoe Canyon North and South, Behind the Rocks, Desolation Canyon, Floy Canyon, Spruce Canyon, Flume Canyon, Westwater Canyon, Lost Spring Canyon, and Daniels Canyon). It also indicates the desert tortoise may inhabit Red Mountain and Cottonwood Canyon WSAs. [Utah Wilderness Association]

**69.42 RESPONSE:** See the responses to General Comments 9.6, 13.1; and Specific Comment 68.23. The Wildlife Including Special Status Species sections in the Final EIS has been reviewed and updated.

**69.43 COMMENT:** Cottonwood Creek is inhabited by beaver (not recognized in Draft EIS) and has potential for supporting a population of trout. [Utah Wilderness Association]

**69.43 RESPONSE:** See the response to Specific Comment 69.32. Beaver are present in Cottonwood and Diamond Creeks. The text has been revised to show the presence of the beaver.

**69.44 COMMENT:** The potential exists for land treatments (spraying, burning, or chaining and seeding) in wider canyon bottoms to remove overgrown sage, which would increase forage (for cattle)." BLM fails to address the cost benefit of these burnings or chainings. BLM needs to give a map showing the location of Proposed Actions. This action was not described in the Grand Resource RMP. [Utah Wilderness Coalition]

**69.44 RESPONSE:** The potential for vegetation treatments in the WSA is discussed in the text of the Final EIS along with the projected increases in AUMs and improvement in wildlife habitat. These treatments are identified in the Grand RMP (USDI, BLM, 1983a) in the vegetation treatment and fire management sections. Maps showing the locations of these treatments can be found in the RMP.

**69.45 COMMENT:** BLM should intensively survey cultural resources and threatened and endangered plant species. [Utah Wilderness Coalition]

a. No survey of threatened or endangered plants has been performed. No survey of cultural (archaeological sites) resources has been done. A prehistoric Indian campsite has been found in this area.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

b. While BLM has not performed inventories of archaeological values and endangered animals and plants, they have developed the Book Mountains Transportation Plan which indicates the engineering feasibility of constructing access roads into the area.

**69.45 RESPONSE:** See the responses to General Comments 9.6. and 15.1. The text of the Final EIS has been clarified to explain that the purpose of the Book Cliffs transportation plan is to control location of roads and provide construction standards for roads built as a result of oil and gas activities. BLM is not proposing to construct roads in the Book Cliffs area.

**69.46 COMMENT:** The East Central Region, Desolation Canyon and the Book Cliffs WSAs (Floy, Coal, Spruce, and Flume Canyons) provide excellent sylvian hiking/backpacking opportunities, combined with opportunities to view deer, elk, and bear. Popularity of this region would increase if a reasonable set of hiking trails was established. We recommend the entire WSA complex be retained as wilderness, with well defined trailheads and hiking trails to provide visitors with a unique forest wilderness experience. [Wasatch Mountain Club]

**69.46 RESPONSE:** See the response to Specific Comment 66.9.

**69.47 COMMENT:** In the Draft EIS, BLM states that this area is so rugged that this "may limit" hiking quality. This is almost laughable. If a very rugged area does not qualify for wilderness, then what does? This response shows how even BLM thinks that Coal Canyon has outstanding opportunities for primitive outdoor recreation. [Sierra Club, Cache Group]

**69.47 RESPONSE:** Vertical cliffs and ledges are barriers to hiking. Nevertheless, the entire WSA is considered to have outstanding opportunities for primitive, unconfined recreation. Hiking is one of the outstanding opportunities provided.

**69.48 COMMENT:** The Draft EIS analysis of recreation in the WSA is inaccurate. The statement, "there is no evidence of hiking or camping use away from roads or ways" is wrong. Unfortunately, many campers in this area have not practiced "no trace camping" techniques and bits of litter and fire rings can be found in the backcountry. Many UWA members spend a good deal of time backpacking and horsepacking in the WSA and we do not camp along roads or ways. We are often genuinely surprised to encounter others in

the backcountry. BLM should not underestimate the growing popularity of the Book Cliffs for wilderness recreation. [Utah Wilderness Association]

**69.48 RESPONSE:** The discussion of recreational use in the WSA has been clarified. Use figures are not known, but backcountry use does occur.

**69.49 COMMENT:** I visited the area on a backpack trip this spring and found that the most logical travel routes lie along the headwaters of the various drainages at the northern end of the WSAs. An easily traveled route, much of it a cattle trail, exists from the road at the end of Seago Canyon along the Roan Cliffs all the way to Cottonwood Canyon. The "recreation" sections of the individual analysis documents should address the enhanced travel opportunities. [John Veranth]

**69.49 RESPONSE:** The discussion about primitive recreation opportunities has been clarified in the Wilderness Values section. The existence of logical travel routes interconnecting WSAs is discussed. It is identified that wilderness opportunities in contiguous WSAs would be enhanced by wilderness designation of Book Cliffs WSAs.

**69.50 COMMENT:** This area is within the BLM driving time of 5 hours from a major population center, adding to the diversity of wilderness areas near populated areas. The area is divided by BLM into three gross vegetative types: Douglas fir forest (9,620 acres) Pinyon-juniper woodland, and riparian/ sagebrush. [Utah Wilderness Coalition]

**69.50 RESPONSE:** As discussed in the Wilderness Values section of the Affected Environment in the Final EIS, Coal Canyon WSA is within a 5-hour driving time of two standard metropolitan statistical areas and has the PNV types of juniper-pinyon woodland and saltbush-greasewood. Existing vegetation types include the species you mentioned, as well as others.

**69.51 COMMENT:** You couch the benefits of recreation in economic terms, not in the intangible and non-commercial values these areas will provide to a growing and harried population. These contiguous roadless areas, Coal, Spruce, and Flume Canyons, are in close proximity to Interstate 70, making them an ideal destination from many places in Colorado and Utah. A large wilderness area would afford an attractive, convenient, and fascinating backcountry experience for cross-country travelers. With Desolation and Floy



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 69: COAL CANYON WSA (CONTINUED)**

Canyons, this roadless area balances the geographic distribution of BLM and other wilderness in Utah. [Uintah Mountain Club]

**69.51 RESPONSE:** See the response to Specific Comment 66.52.

**69.52 COMMENT:** Previously, BLM offers to designate part of this area as an Area of Critical Environmental Concern but didn't consider designation of that same ACEC proposal as wilderness. BLM should consider a Partial Wilderness Alternative. [Utah Wilderness Coalition]

**69.52 RESPONSE:** This WSA displays high quality wilderness values. It also has mineral values. Resource conflicts are addressed in the Minerals and Wilderness Values sections. ACEC designation could be considered as an alternative to wilderness designation, but the protection of wilderness values would not be as great. A partial wilderness designation is BLM's Proposed Action in the Final EIS.

**69.53 COMMENT:** Coal Canyon has moderate wilderness-quality values and moderate to high conflicts compared with the other WSAs in the region. The area contains an important wildlife habitat. Land use conflicts with wilderness management include coal, other mineral and energy resources, and livestock uses. Parts of this WSA along with the adjacent Spruce and Flume Canyons WSAs could be considered for ACEC designation if not designated wilderness to protect the wildlife resources. [State of Utah]

**69.53 RESPONSE:** See the responses to Specific Comments 69.6 and 69.52.

**69.54 COMMENT:** "The WSA is contiguous to a 48,491.94-acre area (State land) declared as a roadless area by the State of Utah on August 21, 1975." Wilderness designation would be compatible with adjacent State management. Nonwilderness designation would critically affect sensitive game management on both BLM and State land. [Utah Wilderness Coalition]

**69.54 RESPONSE:** Impacts on wildlife habitats and populations are analyzed in the Final EIS. The relationship of the WSA to State lands is also explained.

**69.55 COMMENT:** BLM confuses the county commissions vocal policy against wilderness with the county plan. The county-stated policy should be considered in the public opinion section, not in this section pertain-

ing to approved plans. "The County's stated policy for public lands is: Utilize public lands under multiple use management." The County Commission has opposed all wilderness designations, and using county equipment has illegally damaged wilderness lands. BLM shares the County Commission's misunderstanding of multiple use; they incorrectly limit multiple use to mean mining and oil and gas. [Utah Wilderness Coalition]

**69.55 RESPONSE:** BLM considers the comments of all interested publics. BLM also considers county master plans. These are approved plans for the county and are prepared under the direction of locally elected officials. The direction of these plans are summarized in the Land Use Plans section of the Final EIS. BLM clearly understands the meaning of multiple use as defined in FLPMA. The definition and meaning of multiple use as defined by the Act is more diverse and far reaching than most people recognize. See the response to General Comment 1.2.

**69.56 COMMENT:** In its recommendation BLM has left out 90 percent of the Book Cliffs because of speculative mineral values, although consistently they describe those mineral values as having a low likelihood of development. The oil and gas resource there is said to be (if it exists) in small scattered pools. Well, I have seen the transportation plan for the Book Cliffs, and believe me, they won't be wilderness if they are not designated. They won't be wilderness for very long. [George Nickas]

**69.56 RESPONSE:** See the responses to Specific Comments 69.8 and 69.15.

**69.57 COMMENT:** "There is a local expectation for mineral development to occur in the WSA." "Designation of wilderness could create a significant adverse effect to the local economy due to loss of development." "Because of high expectation for mineral development, both by production companies and local residents, designation could have an adverse social effect as well." This is an unsupported opinion. Deletion of areas from wilderness designation with no specific conflict identified is inconsistent with the Wilderness Study Policy. See comments on UT-060-100B (Flume Canyon). [Utah Wilderness Coalition]

**69.57 RESPONSE:** See the responses to Specific Comments 69.8 and 69.15. The analysis of the effects of wilderness designation or nondesignation on the local economy is based on standard economic projections for the area and not "unsupported conclu-

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 69: COAL CANYON WSA (CONTINUED)

sions." Assumptions for employment, income, and revenues were made based on the average operation that occurs in the Utah area and the type and likelihood of development that would occur in the foreseeable future with each alternative. The Partial Wilderness Alternative for this WSA was formed by eliminating most of the area where mineral development and wilderness preservation would conflict.

**69.58 COMMENT:** BLM lacks any systematic economic analysis both in the short and long term which would evaluate the real impact of wilderness designation. No indication of the ability of other areas meeting real resource development needs appears in the analysis. [Utah Wilderness Coalition]

**69.58 RESPONSE:** The Mineral and Energy Resources section in Volume I provides a systematic resource evaluation on a Statewide and national basis. The Socioeconomics section in Volume I provides an analysis of the employment and income and revenues anticipated from WSAs in Utah. An analysis of potential impacts of wilderness designation on mineral and energy resources in Utah and the ability of areas outside of the WSAs to provide mineral and energy resources is also provided.

**69.59 COMMENT:** The loss of grazing resources from nondesignation (now \$4,000 annually to the local economy) is not made. Local economic loss of hunting is also not adequately presented. [Utah Wilderness Coalition]

**69.59 RESPONSE:** The Final EIS analyzes the impact of wilderness designation of the Coal Canyon WSA on livestock grazing and hunting. See the Livestock, Wildlife, and Socioeconomic sections for details. Grazing would continue at current levels and no significant impacts would occur. Hunting would also be allowed, however, motorized travel could not occur inside of the WSA.

**69.60 COMMENT:** The worst-case implication is that 20 local jobs would be foregone with (wilderness) designation. BLM failed to consider the majority of the jobs generated would be for short-term migrant labor and few for local people. No methodology for economic analysis is documented. [Utah Wilderness Coalition]

**69.60 RESPONSE:** See the response to Specific Comment 69.57.

**69.61 COMMENT:** Wilderness designations would enhance local tourism and is consistent with State plans and policies for land management in the area. [Slickrock Outdoor Society]

**69.61 RESPONSE:** The Final EIS recognizes that the recreational benefits of wilderness designation and considers compatibility of wilderness designation with State plans and policies.

**69.62 COMMENT:** Tourism, the one important local industry that is growing, would be positively served by wilderness designation. There is no doubt that a wilderness area encompassing a large part of the Book Cliffs roadless country could become a major tourist attraction, contributing significantly to the tourism-dependent local economy. Under the worst-case scenario, the Draft EIS states the All Wilderness Alternative could result in a loss of 20 future jobs being available. This assumes there are not areas of similar or better energy potential outside of proposed wilderness where the jobs could be provided, and that is simply not the case. The Draft EIS admits that even under the Proposed Action "likelihood of development is low" and that under the All Wilderness Alternative "the loss of development opportunity would not be significant." [Utah Wilderness Association]

**69.62 RESPONSE:** The Final EIS considers the affect of wilderness designation both on nonrecreational development and on recreational values and uses. These affects are translated into economic values where possible in the Socioeconomic section. See the responses to Specific Comments 69.8 and 69.15 regarding development projections for the Coal Canyon WSA. See the response to Specific Comment 69.61 regarding recreational benefits.

**69.63 COMMENT:** The discussion on leasable minerals in the Draft EIS seems to support a much more favorable rating for oil and gas than the SAI rating of f2/c3. [State of Utah]

**69.63 RESPONSE:** The discussion in the Final EIS has been changed to show a more favorable rating for oil and gas.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 70: SPRUCE CANYON WSA**

**SECTION 70**  
**SPRUCE CANYON WSA**

**70.1 COMMENT:** The Book Cliffs area WSAs should be combined into one unit. [Slickrock Outdoor Society, Uintah Mountain Club, Utah Wilderness Association, Dean Petaja, and John Veranth]

a. By creating (fabricating) three separate WSAs, you have fragmented an intact roadless unit with uniform physiography, wildlife, and wilderness values. This is not appropriate.

b. We have chosen to make a combined comment on these three Book Cliff units because, in reality, they are one contiguous roadless area with 4x4 roads extending part way up Cottonwood, Diamond, and Preacher Canyons. We recommend they be combined in the Final EIS as one Book Cliffs unit.

c. Spruce Canyon WSA is one of three contiguous Book Cliffs WSAs that are not separated by any imprints of man. Coal, Spruce, and Flume Canyons WSAs should be recombined to form a single, large Book Cliffs unit. The boundary between Coal Canyon WSA and Spruce Canyon WSA is Cottonwood Creek. A jeep trail exists part way up Cottonwood Canyon but is virtually obliterated before reaching the confluence with Little Twin Canyon. Beyond this point, hiking in Cottonwood Canyon is very enjoyable. Near the head of Cottonwood Canyon, the boundary shoots straight up the mountain to the ridgeline, where no vehicle has ever been. The boundary between Spruce Canyon WSA and Flume Canyon WSA is Diamond Creek. A jeep trail exists part way up Diamond Canyon but is obliterated above the confluence with Halfway Canyon (see attached news article). From this point on, hiking is very pristine and leads to one of the Book Cliff's gems, the beaver ponds, meadows, and glens at the head of Diamond Canyon. Obviously, there are no imprints separating the Coal, Spruce and Flume WSAs and they should be recombined to form a nearly 150,000-acre Book Cliffs unit.

d. What is the justification for treating the areas as separate WSAs?

e. BLM's divide and conquer strategy separated what was once the Cottonwood Canyon WSA. On the ground, in fact, they are not separate. The lower section of Cottonwood Canyon has an old jeep trail and

the extreme lower portion has seen oil and gas activity in the past. There has been no activity (oil and gas) for years. Why not "cherry-stem" the impacted area and close the old jeep trail past that point. Oil and gas favorability is rated as low for this area which seems to be born out by the fact that the Cottonwood Canyon wells did not produce. Yet in the face of extremely high wildlife values, BLM recommends No Action/No Wilderness. Admitting that the No Action Alternative could result in total loss of habitat, BLM arrogantly assumes the wildlife can find other habitat. Where in Utah can wildlife go? BLM needs to take responsible, resource-based action and recommend All Wilderness for all the Book Cliffs units. The same arguments discussed above apply equally to Flume Canyon; recommend All Wilderness.

f. The five Book Cliffs area WSAs represent 403,660 acres (630 square miles) of geologically similar terrain. "They also are adjacent to the State of Utah South Book Cliffs Designated Roadless Areas of 48,490 acres in the Roan Cliffs, set aside in 1975." If the wilderness inventory had followed BLM policy, unimpacted BLM land forming a contiguous ecosystem would have lead to approximately 650,000 acres of land under wilderness study. [Utah Wilderness Coalition]

**70.1 RESPONSE:** See the responses to General Comments 3.1 and 3.29 and Specific Comment 69.3.

**70.2 COMMENT:** We support and recommend to the BLM the 20,350-acre Spruce Canyon proposal of the Utah Wilderness Coalition; this is within the 23,810-acre WSA. Overall, it is hard to tell why BLM will not recommend this area for entry into the National Wilderness Preservation System. [Sierra Club, Cache Group]

**70.2 RESPONSE:** See the response to Specific Comment 69.6. BLM recognizes that the Book Cliffs area has support for wilderness designation. Approximately 75,145 acres in the Book Cliffs have been proposed for wilderness designation in the Final EIS. This is an increase of 52,005 acres over that proposed in the Draft EIS. Of that amount, 14,736 acres would come from the Spruce Canyon WSA (the No Action/No Wilderness Alternative was the Proposed Action in the Draft EIS).

**70.3 COMMENT:** The old jeep trails on which the areas are divided are scarcely used and are being

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 70: SPRUCE CANYON WSA (CONTINUED)

naturally revegetated, and there is scant sign of human activity, certainly none permanent, in this rugged, wonderful, wild area. Wildlife values are extremely high, due to the remoteness from large population centers, the dissected and tumbled terrain, the good water in the canyons, and the light human intrusions. The wilderness experience is absolutely incomparable. BLM has used oil, gas, and coal as a reason to exclude these areas from consideration, yet the possibility of coal development is not good, and oil and gas potential is described as "low" in the Draft EIS. We believe that high quality wilderness values are being ignored in favor of relatively low quality mineral potential. The northern Book Cliffs are riddled with roads and well sites. Why subject the finest wildlife habitat in the State to potential degradation or destruction, when far superior oil, gas, and coal potential can be found elsewhere? [Uintah Mountain Club]

**70.3 RESPONSE:** See the responses to Specific Comments 69.3, 69.7 and 69.8. It is important to note that BLM does not project coal development in the Book Cliffs (specifically the Sego coal field) in the foreseeable future. The WSA does have a high potential for oil and gas exploration and development.

**70.4 COMMENT:** The dropping of Book Cliffs has been purely political to this point, because of some local opposition, perhaps, but Congress is the place for politics, not in BLM. BLM should find all these WSAs and Desolation Canyon as suitable and have the GS/BM reports completed. They have the most outstanding wilderness values in the State of Utah, and they have already shown they are very valuable for that use. [George Nickas]

**70.4 RESPONSE:** See the responses to General Comment 8.6 and Specific Comments 66.21, 69.6, and 69.11. In the Final EIS, BLM's Proposed Action for the Spruce Canyon WSA is a Partial Wilderness Alternative of 14,736 acres. A USGS/USBM report has been requested for the proposed area.

**70.5 COMMENT:** There does not appear to be any logic on how BLM selected its [referred alternative of 1.9 million acres. I fully agree and support that the entire 1.9 million acres be designated wilderness because they exhibit exceptional wilderness characteristics. However, I don't understand why additional WSAs that exhibit the same wilderness qualities which should be recommended as wilderness are not. An example is the Book Cliff area. While living in Ver-

nal I have spent considerable time exploring the Book Cliff area. Spruce Canyon WSA, Flume Canyon WSA, and Coal Canyon WSA should all be included as wilderness recommendations. Your own Draft EIS states "likelihood of development is moderate to low;" "The large size and blocky configuration of the WSA contribute to a feeling of vastness, and the rugged temporary and isolated nature provide outstanding opportunities for the visitor to find solitude." "Primitive and unconfined recreation opportunities are present uniformly throughout the WSA;" and that "The WSA covers part of an area of critical watershed and provides habitat for big game animals that shy away from areas of human occupation." Yet these three WSAs are not recommended for wilderness. Nor is there given any reason why they are not recommended for wilderness. Why are Spruce Canyon WSA, Coal Canyon WSA, and Flume Canyon not recommended for wilderness designation? [D. Kennell]

**70.5 RESPONSE:** See the responses to General Comments 8.2 and 8.6 and Specific Comment 69.6. In the Final EIS, portions of all four WSAs are included in BLM's Proposed Action for wilderness designation. A summary of the rationale for the Proposed Action is given in Appendix 11 in Volume I.

**70.6 COMMENT:** These WSAs are not recommended as wilderness in the BLM "Proposed Action" and should be recommended as wilderness. In the Draft EIS, BLM admits development potential in these areas is moderate to low. The areas are extremely important to wildlife, important as watersheds, have valuable cultural resources, and the areas are isolated, rugged, and provide outstanding wilderness characteristics. The areas are highly erosive in nature and would be extremely difficult to develop without creating unacceptable resource damage. In addition, these areas are immediately adjacent to a State roadless area and the Hill Creek extension of the Ute Indian Reservation which are being managed as wilderness.

**70.6 RESPONSE:** See the responses to Specific Comments 65.14, 69.3, 70.4, and 70.5.

**70.7 COMMENT:** The Desolation should be expanded past the southern confluence with the Price River on the east side of the Green River. The southern portion of Floy Canyon should also be recommended wilderness. The Desolation/Floy/Coal/Spruce/Flume Canyons along with the State roadless area and the Hill Creek extension could compromise the largest and

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 70: SPRUCE CANYON WSA (CONTINUED)**

best BLM wilderness in the State and could be renamed the Book Cliff-Desolation Wilderness. [D. Kennell]

**70.7 RESPONSE:** See the responses to General Comments 3.1 and 3.29 and Specific Comment 69.3.

**70.8 COMMENT:** There is no rationale for BLM's recommendation. Coal and oil and gas development are unlikely to be commercially feasible. BLM makes no estimates on the feasibility of these resources. [Utah Wilderness Coalition]

**70.8 RESPONSE:** See the responses to General Comments 15.11 and 15.20 and Specific Comment 70.2. The rationale for BLM's Proposed Action is summarized in Appendix 11 in Volume I. BLM projects that oil and gas resources will be explored and developed in the WSA in the foreseeable future. The feasibility for exploration, extraction, and commercial development of mineral resources in the WSA is addressed in the Final EIS. See Appendix 6 in Volume I.

**70.9 COMMENT:** The benefits of designating adjacent areas should be discussed. [John Veranth]

a. In the individual WSA sections, the "size" section states areas are of sufficient size to enhance wilderness values. Why was the additional benefit of the adjacent areas not discussed?

b. This is a large contiguous roadless area consisting of 600,000 acres of BLM land. When adjacent State and Indian roadless lands are included, the potential roadless/wilderness area totals about a million acres. The synergistic benefits of the adjacent areas are not fully addressed in the Draft EIS. This large area would allow human impact sensitive wildlife species to spend the entire year in a roadless area since the elevation range encompasses both summer and winter range. Why was the wildlife benefit not considered in the analysis

**70.9 RESPONSE:** See the response to Specific Comment 69.14.

**70.10 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**70.10 RESPONSE:** Additional information has been included in the Final EIS concerning these resources.

**70.11 COMMENT:** Riparian habitat is mentioned here but specific impacts are not detailed. They should be described. [Scott Mills]

**70.11 RESPONSE:** The text notes that about 5 percent of the WSA consists of a riparian-sagebrush vegetation community. This community is located in canyon bottoms and drainages. Riparian vegetation dominates along perennial or intermittent streams and the sagebrush dominates in the drier areas. For the No Action/No Wilderness Alternative, exact sites of surface disturbance have not been determined in many cases. However, it can be assumed that the majority of the surface disturbance projected for the WSA in the foreseeable future (290 acres) would occur in the sagebrush communities. Much of this disturbance would be temporary. For example, about 106 acres of vegetation treatments (burning and seeding) would take place in the sagebrush community. Following successful seeding, the sagebrush would be replaced with a grass-browse vegetation. Soil conditions, wildlife habitat, and livestock forage would actually be improved in this area. However, disturbance associated with oil and gas development would be expected to remain over a long-term period of time. Surface disturbance to riparian areas is projected to be minimal, not exceeding 5 acres. Two of these acres would result from the installation of in-stream drop structures which would not harm riparian vegetation. In any case, BLM does not project that either the sagebrush or the riparian vegetation in the WSA would receive substantial, unmitigated impacts. Impacts to the riparian-sagebrush vegetation type are not projected with the All Wilderness Alternative.

**70.12 COMMENT:** We feel that sediment load from even modest road construction and site preparation would result in unacceptable degradation of water quality in the Book Cliffs WSAs. Continued activities on-site, especially with ongoing mining activities or the establishment of oil and gas "fields," would likely cause continued erosion in this up-and-down canyon country. In the canyons with perennial streams, beaver dams--nature's own "instream drop structures"--would certainly be affected. Don't meddle. If there is to be soil loss, let it be under the All Wilderness Alternative. [Uintah Mountain Club]

**70.12 RESPONSE:** See the response to Specific Comment 68.11.

**70.13 COMMENT:** Dry holes at the Bogart Canyon site and other sites around the Book Cliffs should

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 70: SPRUCE CANYON WSA (CONTINUED)

convince oil companies that no profit is to be made there. These findings support conservationist claims that wilderness is the most appropriate land use for the WSAs in this region. BLM should deny further leases and exploration claims on Book Cliffs WSAs (Turtle Canyon, Floy Canyon, Coal Canyon, Spruce Canyon, and Flume Canyon), which have already been extensively explored, and recognize the paramount wilderness attributes of these areas. [Wasatch Mountain Club]

**70.13 RESPONSE:** See the responses to General Comments 8.2 and 8.6 and Specific Comments 68.13, 69.6, and 69.23.

**70.14 COMMENT:** Together, the Coal, Spruce, and Flume Canyons WSAs are estimated to have about 9 million bbl of recoverable oil and 54 billion of natural gas, recoverable from small, scattered fields. To put this in perspective, this represents about 0.04 percent of all the proven natural gas reserves in the U.S. (in 1979), or enough oil to supply the needs of the U.S. for about a half day. Roading and well sites have the potential for being extremely disruptive to sensitive species, reducing crucial habitats during periods of disturbance. We feel that BLM should not make exploration and development attractive by releasing these areas from the constraints of wilderness management. These areas could be irrevocably altered, and another piece of American wilderness forever lost. [Uintah Mountain Club]

**70.14 RESPONSE:** See the response to Specific Comment 69.25. The amount of energy resources thought to be located in the Utah WSAs is discussed on a nationwide perspective in Volume I. Anticipated impacts from energy and mineral resource exploration and development in the Spruce Canyon WSA have been analyzed and documented in the text of the Final EIS.

**70.15 COMMENT:** There are no coal leases in these WSAs. This reflects the grade of coal there, the availability of coal elsewhere, and the feasibility of recovery. The coal in Flume Canyon WSA is described as "very poor quality." Only 22 percent of the Coal Canyon acreage is considered to have recoverable coal. The 38 million tons of recoverable coal in Coal Canyon is only about 0.5 percent of Utah's total coal reserves. In Spruce Canyon WSA you say that "oil, gas, tar sand, coal . . . likely would not be recovered." Potential exists for small amounts of coal--5 to 30 million tons. "Low tonnage" of coal exists in Flume Canyon WSA, with production unlikely." An optimistic

estimate of recoverable coal in these three WSAs amounts to about 2 percent of Utah's total coal reserves. In the analysis of these WSAs, nowhere do you include a map demonstrating KRCRAs. The reader cannot possibly surmise just where possible conflicts exist. In all cases, you correctly point out that "the loss of development would not be significant." In the Spruce Canyon analysis, you point out the potential hazards to water resources from coal mining: "If an underground coal mine is developed, geologic formations could be fractured, affecting ground water by aquifer bleeding. Springs, if located in the WSA, could dry up or experience reduced flows." In an area where dependable water resources and perennial flow is essential for wildlife and grazing, it is highly inadvisable to allow any development to proceed that would jeopardize this resource. The coal resource is just not that important now. We won't even discuss the inadvisability of strip mining. The negative impacts should be obvious; strip mining should be prohibited at all cost. [Uintah Mountain Club]

**70.15 RESPONSE:** No exploration or development of coal is projected in the foreseeable future in the Spruce Canyon WSA. See the response to Specific Comment 69.26.

**70.16 COMMENT:** The Draft EIS is unclear in many aspects. The location of KGSs and KRCRAs is not shown. The location and description (pre- or post-FLPMA) of leases is not provided. One or two small maps would have sufficed. Thus, it is impossible for the citizen reviewing the document to see specific areas of potential conflict, and thereby suggest other alternatives to the two that you have advanced: No Action and All Wilderness. [Uintah Mountain Club]

**70.16 RESPONSE:** See the responses to Specific Comments 26.1 and 69.6. BLM's preferred alternative now includes a 14,736-acre partial alternative for the Spruce Canyon WSA. The designated portion includes areas with high wilderness values and excludes areas most likely to be developed for mineral and energy resources.

**70.17 COMMENT:** In the Book Cliffs field, several WSAs (Spruce, Flume, Floy, and Coal Canyons) contain coal deposits. USGS investigations of Floy Canyon WSA, typical of these WSAs, indicate that the coal seams are too thin (less than 4.5 feet) to be economically recoverable. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 70: SPRUCE CANYON WSA (CONTINUED)**

**70.17 RESPONSE:** See the response to Specific Comment 68.15. Because better resources are located elsewhere, BLM does not project that coal would be developed in the Book Cliffs in the foreseeable future even with the No Action/No Wilderness Alternative.

**70.18 COMMENT:** Why does the small oil and gas field in adjacent areas cause a low favorability for oil and gas when there are gas producing wells on the boundary of the WSA? [State of Utah]

**70.18 RESPONSE:** See the response to General Comment 15.1. BLM has reexamined the mineral and energy resource data in the Draft EIS and has determined that a higher potential for oil and gas exists in the Spruce Canyon WSA. This higher certainty is reflected in the text of the Final EIS. BLM projects that development of the oil and gas resource will occur in some degree with any of the alternatives now under consideration. However, implementation of the Partial Wilderness Alternative (BLM's Proposed Action) would provide for continued exploration and development opportunities in the nondesignated portion while the area that contains the highest wilderness values would be designated wilderness and receive additional protection.

**70.19 COMMENT:** The text refers to hundreds of measured coal sections but apparently no coal reserves have been calculated, at least none are reported in Table 1 or 5. The 10-60 million ton figure apparently came from SAI. A better resource estimate would be helpful. [State of Utah]

**70.19 RESPONSE:** See the responses to General Comment 15.1 and Specific Comment 70.17. The reference to hundreds of measured coal sections was a confusing statement and has been deleted from the text of the Final EIS. The extent of the coal resource is not well known. The best available estimate is between 10 and 60 million metric tons of in-place coal.

**70.20 COMMENT:** The areas I am particularly concerned with are Jack, Desolation, Turtle, Floy, Coal, Spruce, and Bruin Canyons. BLM has looked at mineral values and considered mineral values versus wilderness values. But I think probably BLM is supposing a little too much in the mineral area. Maybe I can illustrate with a case in point. The Book Cliffs area and the Desolation Canyon area are some of the most rugged and remote country in Utah. These places have wildlife: black bear, bighorn sheep, mountain lion,

deer, and elk. You can grow deer most anywhere. You can grow elk in a lot of places. But, there really are not very many places where you can get a good population of bear and lions. The only reason that they weren't recommended that I can figure out is their low to moderate potential for mineral development. Even if they had great potential for mineral development, the potential for wildlife and wilderness experiences are greater. [J. Barnett]

**70.20 RESPONSE:** See the responses to General Comments 8.15 and 16.15 and Specific Comment 66.46.

**70.21 COMMENT:** BLM is placing the importance of the potential development of a marginal oil and gas resource above the importance of preserving an outstanding and unique wilderness and wildlife resource. Just how important is the potential oil and gas resource in these three WSAs? In their summary of significant environmental consequences for each of these units, BLM indicates that due to the low likelihood of recovery, the collective loss of development of gas and oil resources within these WSAs would not be significant! Yet the threat of losing the opportunity to extract these insignificant quantities of fossil fuels is "driving" the decision to not recommend unquestionably deserving wildlife and critical wildlife habitat for wilderness. This situation is especially absurd when one realizes that there is ample opportunity to develop far more favorable energy leases outside the WSAs in the Book Cliffs. It is highly unlikely that any American will ever receive one Btu of benefit from fossil fuels from within the boundaries of these WSAs and yet without designation as wilderness, motorized activities associated with mineral exploration, ORV use, and livestock development will, over time, compromise the outstanding wilderness and wildlife resources over much of these WSA's. [Slickrock Outdoor Society]

**70.21 RESPONSE:** See the responses to General Comment 15.1 and Specific Comments 70.16 and 70.18. The minerals data for the Spruce Canyon WSA have been reviewed and updated as necessary. Potential for oil and gas is believed to be high. Approximately 26 oil and gas exploration holes have been drilled within 3 miles of the WSA. Of these, three located on the boundary of the WSA are gas producers, and one located about 3 miles to the southwest of the WSA is an oil producer. Oil and gas fields near the WSA include Book Cliffs, Left Hand Canyon, Bull Canyon, and Cisco Dome. BLM does not project that coal

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 70: SPRUCE CANYON WSA (CONTINUED)**

development will occur in the Book Cliffs area in the foreseeable future.

**70.22 COMMENT:** The mineral value of Spruce Canyon WSA is grossly exaggerated in the Draft EIS. This is because it was studied along with Coal Canyon and the results of the potential of this 85,000-acre unit were carried over to Spruce Canyon WSA. For example, Spruce Canyon is given an f3 rating for coal even though the Draft EIS describes the coal resource as of "poor quality" and in seams less than 2 feet thick. In discussing total mineral potential in the WSA, the Draft EIS states, "Due to the low likelihood of recovery of these mineral resources, even without wilderness designation, the loss of development opportunity would not be significant (with wilderness designation)." [Utah Wilderness Association]

**70.22 RESPONSE:** See the responses to General Comment 15.1 and Specific Comments 70.18 and 70.21.

**70.23 COMMENT:** This very wild WSA contains important habitat for mountain lion and elk which can best be protected through wilderness protection. [Sierra Club, Cache Group]

**70.23 RESPONSE:** The text of the Final EIS contains a discussion of mountain lion and elk and their habitat.

**70.24 COMMENT:** If the proposals for these WSAs were not so serious in their consequences they would be laughable! These areas are not really three separate areas at all--they are one large 135,000-acre roadless wilderness area. How can you claim that this is not wilderness?! Any wildlife biologist would laugh at your claims! The Draft EIS itself points out that this is one of the most pristine and important wildlife habitats in the entire State of Utah! These WSAs favor wildlife because of their relative lack of human impacts." Relative to what--the face of the moon!? These areas are crucial big game habitat for black bear, cougar, and elk--animals that even your own Draft EIS admits are "very sensitive to human intrusion." I have read the entire Draft EIS, a very dismal task, and believe that this is the only BLM wilderness that contains black bear. [Scott Delong]

**70.24 RESPONSE:** See the responses to General Comment 3.1 and Specific Comment 69.36.

**70.25 COMMENT:** There is a bias away from any sort of priority for wildlife. For example, Fremont Gorge WSA (Volume IV) is described as being critical deer winter range throughout. Also, two endangered species are "likely to inhabit the WSA." All of these species would be negatively impacted by disturbances under the No Wilderness Alternative, yet BLM's recommendation is for No Wilderness. Perhaps an even more striking example is Spruce Canyon with riparian habitat, an endangered species, four candidate species, and two sensitive species. Again, the recommendation is the one that would most impact the wildlife: No Wilderness. It would seem that for many of the WSAs, priority should be given to the alternative which most benefits broad wildlife values regardless of conflicting multiple-use possibilities. [Scott Mills]

**70.25 RESPONSE:** See the responses to Specific Comments 69.6, 69.37, and 70.26. BLM does not assume that implementation of the No Action/No Wilderness Alternative would automatically result in a "total" loss of wildlife habitat. The sensitive species that can be found in the WSA are discussed in the text of the Final EIS. BLM has revised its Proposed Action from No Action/No Wilderness to Partial Wilderness (14,736 acres). Wildlife species would receive additional protection with this Proposed Action.

**70.26 COMMENT:** The EIS underestimates impacts on wildlife. [Richard Frederickson and Scott Mills]

a. It is not satisfactory for the Draft EIS to say that sensitive animals "could move into adjacent areas because the WSA encompasses only a small portion of the recognized habitats for these species." First of all, the areas to the north and east (Flume Canyon WSA) and the south (Coal Canyon WSA) may not be available to immigrants from Spruce Canyon because BLM's proposed "No Action" alternatives for these WSAs may subject these habitats to similar development pressures as mentioned for Spruce Canyon. Secondly, even if these "boundary" WSAs were completely undisturbed, one certainly cannot assume that they are "open" for dispersers from Spruce Canyon. Dispersers incur high mortality and social interactions between residents, and intruding dispersers are almost always to the detriment to the intruder. For these reasons, the above quote is clearly not necessarily true. Island biogeography concepts may apply especially well to this WSA.

b. The assessment of impact for Spruce Canyon states that in the event of noncompatible development



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 70: SPRUCE CANYON WSA (CONTINUED)**

sensitive animals, quote, "Could move into adjacent areas because the WSA encompasses only a small portion of recognized habitat for these species." This is unlikely. It is more likely that the suitable habitat for this species exists in the adjacent areas and is already saturated by local populations. Furthermore, BLM's proposal recommends nondesignation for all of the Flume Canyon WSA bordering on the north and east and the Coal Canyon WSA bordering on the south. In this case, BLM should either redesignate the adjacent WSAs or redo this statement giving much more consideration to the effects of nondesignation on wildlife values.

**70.26 RESPONSE:** See the responses to Specific Comments 69.3 and 69.37. The surface disturbance projected for the WSA would mainly be restricted to drainages and canyon bottoms as discussed in the text. Overall, impacts to wildlife in the area would not be significant. Only about 3.5 percent of the WSA would be disturbed in the foreseeable future with the No Action/No Wilderness Alternative. The majority of this disturbance would result from vegetation treatments and would be quickly reclaimed, and habitat would actually be improved. It is recognized that oil and gas development activities would last over the long-term and some loss of wildlife habitat would occur.

BLM believes that the proposed Partial Wilderness Alternative for Floy, Coal, Spruce, and Flume Canyon WSAs provides for sufficient protection for wildlife species located in the Book Cliffs area, especially when adjacent roadless areas on State of Utah and Indian lands are considered.

**70.27 COMMENT:** These areas support an impressive variety and number of species. Food, cover, and water are abundant. This is indispensable wildlife habitat. Large areas of these WSAs are considered "crucial" year-round habitat and winter range. An inconsistency appears here. In the Draft EIS, Coal Canyon WSA is identified as having 95 percent of its acreage as "crucial" winter range, with 2,457 acres as "crucial" year-round habitat for deer, elk, and mountain lion. Spruce and Flume Canyon WSAs have no areas identified as "critical habitat." Yet the physiography of the regions is practically identical and the contiguous WSAs are separated by deeply eroded canyons and rugged relief which obviously limit east-west migration. Put another way, why should the 58,173 acres of Coal Canyon WSA be "crucial" winter range to the 40 elk that winter there, while the 80 elk that

winter in Spruce Canyon WSA and the 40 elk that migrate to Flume Canyon WSA have no "critical habitat"? We suspect that all three WSAs have large segments of critical habitat. Seasonal migration takes place largely along the generally north-south trending canyons, from higher to lower elevations and back again. In winter, animals stay in the deeply-wooded canyons, by perennial water courses, and off the exposed ridgetops. The assignment of "no critical habitat" in Spruce and Flume Canyons WSAs does not meet the test of reasonableness, when a contiguous and physically similar WSA is practically covered with "crucial" winter range. Another inconsistency appears in the Spruce and Flume Canyons WSA analyses when you state that "the entire WSA provides crucial habitat for species that are very sensitive to human intrusion, including elk, bear, and mountain lion" (Flume Canyon). Yet, in the same paragraph, you state that there is "no critical habitat" in the WSA. What is the difference between "critical" and "crucial"? The Glossary doesn't identify this distinction. My thesaurus does not distinguish between the two words. Spruce Canyon has the same "sensitive" species as the other two WSAs, but, oddly enough, has no "crucial" or "critical" habitat. We find these inconsistencies very difficult to digest. In point of fact, UDWR ascribes crucial habitat to the entire southern and eastern Book Cliffs, reflecting the fact that these areas represent the finest, least-impacted wildlife habitat in the State. [Uintah Mountain Club]

**70.27 RESPONSE:** See the response to Specific Comment 69.37.

**70.28 COMMENT:** You correctly point out the unique nature of the resource and possible adverse effects of development (Coal, Spruce, and Flume Canyons). You also point out the development pressures which now exist in other areas of the Book Cliffs, and the compounding effect that additional development would have if allowed to occur in these WSAs. Yet you fail to take the next logical step, by concluding that, if habitat for sensitive species is to be maintained in a time when pressures on wildlife are ubiquitous and unrelenting, then these three special areas must be saved in block from future development. You have sided with development, pure and simple. You assume that pressured animals will just go "over the hill." You don't acknowledge a simple ecologic fact: that all habitats are not created equal. The habitat that will likely be impacted most will be the riparian zones and canyon bottoms at lower elevations--critical areas to most large overwintering wildlife.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 70: SPRUCE CANYON WSA (CONTINUED)

Your failure to address the needs of wildlife by simply writing off the effects of development is either callous, uninformed, or disingenuous--or a combination of all of these. No attempt is made to identify the relative importance of this resource in Utah, and, aside from citing "stipulations," we are not told how BLM intends to protect the resource." We feel that wilderness designation is the best way to protect the Book Cliffs' wildlife. Legislative protection leaves little room for broad interpretations or diverse managerial philosophies. With resource preservation, perhaps we won't wind up with the "mess" that occurred in the northern part of the Book Cliffs. If you want an idea of how important habitat preservation can be, we recommend that you talk to folks who hunted the northern Book Cliffs several years ago. For some species, "peaceful coexistence" just doesn't occur with extensive roading and site development. [Uintah Mountain Club]

**70.28 RESPONSE:** See the responses to Specific Comments 69.3, 69.7, 69.11, 69.37, 70.25, and 70.26.

**70.29 COMMENT:** Probably the biggest tragedy in the whole BLM wilderness review in Utah is BLM's recommendation of only 23,000 acres in over a quarter million acres of wilderness land in the eastern Book Cliffs. BLM recognizes in the EIS that virtually this entire quarter million acres of land is crucial habitat for elk, black bear, and cougar. The reason it's crucial is because it's all that's left that's roadless in the Book Cliffs. It's amazing where these species have been driven. It's especially crucial for black bear. It's probably the last stronghold in the State of Utah for black bear. The reason that all of these areas have been left out of the review is again potential oil and gas development. BLM should have all of the information they can get on these areas before they make a recommendation to congress. These areas that are omitted in the eastern Book Cliffs have recognized high wilderness values. BLM recognized they may be the highest wilderness values in the State of Utah, and yet by recommending as unsuitable now, BLM eliminates the opportunity for these areas to have the USGS/USBM studies that will be done on all the suitable areas. There is no reason not to recommend these areas as wilderness at this stage in the process. BLM admits that all of the information on the oil and gas resource is highly speculative. It may or may not exist in this area. The decision to level those areas out is purely political. At this state, BLM should base their decisions on resource data, make

sound resource decisions, and leave the politics to Congress. That's why Congress has reserved the right for themselves to make final determination on wilderness areas. [George Nickas]

**70.29 RESPONSE:** See Appendix 11 in Volume I for the rationale for BLM's Proposed Action. See the response to Specific Comment 69.39.

**70.30 COMMENT:** This area includes riparian habitat which as described in Volume I as, "unique and limited riparian habitat." However, in the EIS, BLM does not say how riparian habitat will be affected by the No Wilderness Alternative. Also found in this WSA are the endangered white-footed ferret, golden eagle, which is considered a sensitive species, and four candidate species: the ferruginous hawk, the long billed curlew, the spotted owl, and the western yellow-billed cuckoo. Candidate species are those that require special attention to avoid becoming threatened or endangered. [Richard Frederickson]

**70.30 RESPONSE:** See the response to Specific Comment 70.11. It is assumed that the commentor is referring to the black-footed ferret, not the white-footed ferret. While the text notes that the ferret possibly occurs in certain of the WSAs, BLM inventories to date indicate that suitable black-footed ferret habitat does not likely occur in any of the WSAs. Based on criteria established by FWS, the ferret requires a prairie dog prey base which occupies an area of at least 250 acres. This can occur either as a single colony or as a group of smaller isolated prairie dog colonies that exceed 250 acres within a 4.5-mile radius.

**70.31 COMMENT:** Threatened and endangered species are summarily dismissed. The Draft EIS (page 78) notes no terrestrial threatened and endangered species are found in WSAs and the only nonaquatic threatened and endangered animals are migrant bald eagles and peregrine falcons. It fails to note bald eagles are not mere migrants to Westwater Canyon WSA (they are permanent residents). Only the North Horseshoe Canyon WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise, the findings on terrestrial threatened and endangered species are flawed. The FWS letter (Draft EIS, Appendix 4) indicates the black-footed ferret may inhabit several WSAs (Dirty Devil, Horseshoe Canyon North and South, Behind the Rocks, Desolation Canyon, Floy Canyon, Spruce Canyon, Flume Canyon, Westwater Canyon, Lost Spring Canyon, and Daniels Canyon). It also indicates the desert

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 70: SPRUCE CANYON WSA (CONTINUED)**

tortoise may inhabit the Red Mountain and Cottonwood Canyon WSAs. [Utah Wilderness Association]

**70.31 RESPONSE:** See the responses to General Comment 9.6 and Specific Comment 68.23. The Wildlife Including Special Status Species sections in the Final EIS has been reviewed and updated.

**70.32 COMMENT:** This area is so remote and rugged that it is largely unexplored!! The Draft EIS even admits this: ". . . it is probable that scenic and archaeological features not mapped or named could be found by wilderness users." This means that your agency, the nation's largest absentee landlord, has never bothered to survey this land for its scenic or archaeological values! Have you ever even been there? The logical corollary to that is that you are making a nonwilderness recommendation based on nothing but your own anti-wilderness biases. Why are these WSAs not included in your wilderness recommendations? I challenge you to give all of us a direct answer that is not couched in bureaucratic double-speak and glittering generalities. The Draft EIS states that these WSAs have "negligible potential" for minerals and that the terrain is so incredibly rugged that even if any mineral discoveries were made, mineral recovery would be "infeasible." There is absolutely no valid reason for not designating the entire 135,000-acre Book Cliffs roadless area as wilderness. I most certainly hope that this pristine and wild wildlife habitat and recreation area will be included in your wilderness recommendations in the Final EIS. [Scott DeLong]

**70.32 RESPONSE:** See the response to Specific Comment 69.7.

**70.33 COMMENT:** On what basis was the predictive model made to determine 20 cultural sites? [State of Utah]

**70.33 RESPONSE:** The Cultural Resources section in Affected Environment has been updated. The predicted number of sites has been revised on the basis of Class II inventory data.

**70.34 COMMENT:** The East Central Region, Desolation Canyon and the Book Cliffs WSAs (Floy, Coal, Spruce, and Flume Canyons) provide excellent sylvian hiking/backpacking opportunities, combined with opportunities to view deer, elk, and bear. Popularity of this region would increase if a reasonable set of hiking trails was established. We recommend the entire

WSA complex be retained as wilderness, with well defined trailheads and hiking trails to provide visitors with a unique forest wilderness experience. [Wasatch Mountain Club]

**70.34 RESPONSE:** See the response to Specific Comment 66.9.

**70.35 COMMENT:** I visited the area on a backpack trip this spring and found that the most logical travel routes lie along the headwaters of the various drainages at the northern end of the WSAs. An easily traveled route, much of it a cattle trail, exists from the road at the end of Sego Canyon along the Roan Cliffs all the way to Cottonwood Canyon. The "Recreation" sections of the individual analysis documents should address the enhanced travel opportunities. [John Veranth]

**70.35 RESPONSE:** The primitive and unconfined recreation portion of the Wilderness Values section in the Final EIS identifies these travel opportunities.

**70.36 COMMENT:** This area is an integral and natural part of the Book Cliffs roadless area and links Coal Canyon with Flume Canyon. [Sierra Club, Cache Group]

**70.36 RESPONSE:** The Wilderness Values section of the Final EIS notes that the Spruce Canyon WSA is located between Coal Canyon and Flume Canyon WSAs and is an integral part of the Book Cliffs ecosystem.

**70.37 COMMENT:** You couch the benefits of recreation in economic terms, not in the intangible and non-commercial values these areas will provide to a growing and harried population. These contiguous roadless areas, Coal, Spruce, and Flume Canyons, are in close proximity to I-70, making them an ideal destination from many places in Colorado and Utah. A large wilderness area would afford an attractive, convenient and fascinating backcountry experience for cross-country travelers. With Desolation and Floy Canyons, this roadless area balances the geographic distribution of BLM and other wilderness in Utah. [Uintah Mountain Club]

**70.37 RESPONSE:** See the response to Specific Comment 66.52.

**70.38 COMMENT:** These areas include crucial habitat for elk, bear, and cougar. Also, the areas have high scenic value due to both nearby rock formations

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 70: SPRUCE CANYON WSA (CONTINUED)**

and deep canyons, and due to the vistas of a huge area to the south ranging from Grand Mesa to Navajo Mountain. The low to moderate mineral potential does not justify a nonwilderness recommendation. [John Veranth]

**70.38 RESPONSE:** See the responses to Specific Comments 69.3, 69.17, and 70.5. Also, see Appendix 11 in Volume I for the rationale regarding the Proposed Action for the Spruce Canyon WSA.

**70.39 COMMENT:** In its recommendation, BLM has left out 90 percent of the Book Cliffs because of speculative mineral values, although, consistently they describe those mineral values as having a low likelihood of development. The oil and gas resource there is said to be (if it exists) in small scattered pools. Well, I have seen the transportation plan for the Book Cliffs, and believe me, they won't be wilderness if they are not designated. They won't be wilderness for very long. [George Nickas]

**70.39 RESPONSE:** See the responses to Specific Comments 69.8, 69.15, and 70.2.

**70.40 COMMENT:** Spruce Canyon WSA has moderate wilderness qualities and moderate conflicts compared with the other WSAs in the region. Coal, oil and gas, and livestock conflicts are present. Wildlife values could be protected even if the area is not designated wilderness through an ACEC designation or special stipulations. [State of Utah]

**70.40 RESPONSE:** See the response to Specific Comment 70.2. The text of the Final EIS has been reviewed and revised to include the most recent data on mineral and energy resources, livestock, and wildlife values.

**70.41 COMMENT:** Wilderness designations would enhance local tourism and is consistent with State plans and policies for land management in the area. [Slickrock Outdoor Society]

**70.41 RESPONSE:** See the responses to Specific Comments 69.61 and 69.62. Based on current studies, BLM projects that recreation use will likely increase 2 to 7 percent annually following wilderness designation.

**70.42 COMMENT:** There are editorial errors in the EIS. [State of Utah and Scott Mills]

a. Page 1 - The word "Road" should be "Roan."

b. Page 21 - An apparent typographical error refers to "visibility" instead of "viability."

**70.42 RESPONSE:** The corrections have been made for the Final EIS.

**70.43 COMMENT:** The five Book Cliffs area WSAs represent 403,660 acres (630 square miles) of geologically similar terrain. "They also are adjacent to the State of Utah South Book Cliffs Designated Roadless Areas of 48,490 acres in the Roan Cliffs, set aside in 1975." If the wilderness inventory had followed BLM policy, unimpacted BLM land forming a contiguous ecosystem would have lead to approximately 650,000 acres of land under wilderness study. [Utah Wilderness Coalition]

**70.43 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**SECTION 71**  
**FLUME CANYON WSA**

**71.1 COMMENT:** BLM did not consider partial wilderness designation as an alternative. In view of the limited extent of conflicts, this alternative needs consideration. BLM should define which of the conflicts are significant and develop a Partial Wilderness Alternative which excludes those significant impacts. [Utah Wilderness Coalition]

**71.1 RESPONSE:** In the Final EIS, BLM has developed a Partial Wilderness Alternative of 16,495 acres. This is BLM's Proposed Action. The objective of this alternative is to analyze as wilderness that portion of the WSA that would minimize or avoid areas having the greatest potential for mineral development.

**71.2 COMMENT:** The wilderness values have not been fully identified, yet those known outweigh the marginal and well known conflicts BLM has identified. The present "all wilderness recommendation" is actually a partial wilderness recommendation. During the wilderness inventory, conflicts were removed from the unit causing significant areas meeting the mandatory wilderness criterion to be dropped. The 300-foot face of the lower Book Cliffs, outstandingly scenic and visible for miles from I-70, lies just south of

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 71: FLUME CANYON WSA (CONTINUED)

the WSA. BLM chose incorrectly an insignificant vehicle way between this area and Spruce and Coal Canyons to separate this area. If the Inventory Policy had been followed properly, three areas would be combined into one larger unit containing 189,400 acres to be studied. This area is now under administrative appeal for BLM's decision not to study portions of the inventory unit. In the initial inventory, BLM incorrectly deleted part of the unit (48,480 acres from 100A, 100B, and 100C). In the intensive inventory the BLM dropped: 9,240 acres from 100A (all of 100A) 6,300 acres from 100B, and 22,340 acres from 100C. These areas need to be studied with this unit. [Utah Wilderness Coalition]

**71.2 RESPONSE:** See the responses to General Comments 3.1 and 3.29.

**71.3 COMMENT:** BLM has violated the Wilderness Review Policy during the initial inventory, the intensive inventory, and the study. BLM has allowed intrusions within the area in violation of the Interim Management policy. In view of this history, the present recommendation also is seriously flawed. [Utah Wilderness Coalition]

**71.3 RESPONSE:** See the response to General Comment 3.1. It is difficult to respond to the comment because no specific instances are given. BLM has not violated the Interim Management Policy for the Flume Canyon WSA.

**71.4 COMMENT:** The Book Cliffs WSAs should be combined into one unit. [Slickrock Outdoor Society, Uintah Mountain Club, Utah Wilderness Association, Utah Wilderness Coalition, Dean Petaja, and John Veranth]

a. BLM's divide and conquer strategy separated what was once the Cottonwood Canyon WSA. On the ground, in fact, they are not separate. The lower section of Cottonwood Canyon has an old jeep trail and the extremely lower portion has seen oil and gas activity in the past. There has been no activity (oil and gas) for years. Why not "cherry-stem" the impacted area and close the old jeep trail past that point. Oil and gas favorability is rated as low for this area which seems to be born out by the fact that the Cottonwood Canyon wells did not produce. Yet in the face of extremely high wildlife values, BLM recommends No Action/No Wilderness. Admitting that the No Action Alternative could result in total loss of habitat,

BLM arrogantly assumes the wildlife can find other habitat. Where in Utah can wildlife go? BLM needs to take responsible, resource-based action and recommend All Wilderness for all the Book Cliffs units. The same arguments discussed above apply equally to Flume Canyon; recommend All Wilderness.

b. The five Book Cliffs area WSAs represent 403,660 acres (630 square miles) of geologically similar terrain. "They also are adjacent to the State of Utah South Book Cliffs Designated Roadless Areas of 48,490 acres in the Roan Cliffs, set aside in 1975." If the wilderness inventory had followed BLM policy, unimpacted BLM land forming a contiguous ecosystem would have lead to approximately 650,000 acres of land under wilderness study.

c. By creating (fabricating) three separate WSAs, you have fragmented an intact roadless unit with uniform physiography, wildlife, and wilderness values. This is not appropriate.

d. We have chosen to make a combined comment on these three Book Cliff units because, in reality, they are one contiguous roadless area with 4x4 roads extending part way up Cottonwood, Diamond, and Preacher Canyons. We recommend they be combined in the Final EIS as one Book Cliff unit.

e. The Eastern Book Cliffs WSAs (Coal, Spruce, and Flume Canyon WSAs) are really a single area which has been artificially divided along drainages where no road exists. These areas should be rejoined. What is the justification for treating the areas as separate WSAs?

f. Flume Canyon WSA is one of three contiguous Book Cliffs WSAs that are not separated by any imprints of man. Coal, Spruce, and Flume Canyons WSAs should be recombined to form a single, large Book Cliffs unit. The boundary between Spruce Canyon WSA and Flume Canyon WSA is Diamond Creek. A jeep trail exists part way up Diamond Canyon but is obliterated above the confluence with Halfway Canyon. From this point on, hiking is very pristinine and leads to one of the Book Cliffs' gems, the beaver ponds, meadows, and glens at the head of Diamond Canyon. Obviously, there are no imprints separating the WSAs and they should be recombined to form a nearly 150,000-acre Book Cliffs unit. The northern boundary of the WSA follows a right-of-way part way up Westwater Canyon. From the end of the right-if-way,

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 71: FLUME CANYON WSA (CONTINUED)

the boundary follows legal lines straight up the mountain. A modified manageable boundary should include all of Westwater Canyon whose multi-colored cliffs and other formations remind one of southern Utah. The upper reaches of Westwater Canyon contain grassy meadows, aspen, and timbered slopes. The entire length of the canyon is superb hiking and part of Westwater Creek is suitable for trout. We recognize BLM's concern for adjusting WSA boundaries at this "late" stage of the process, but encourage you take a hard look at this recommendation. A boundary that splits Westwater Canyon is a very poor choice.

**71.4 RESPONSE:** See the responses to Specific Comments 69.3 and 71.1.

**71.5 COMMENT:** BLM dropped 600 acres from the unit because of a "dedicated right-of-way." This right-of-way is north of the Pear Park gas field. The date of the issuance of this right and the condition of the area in 1976 is unknown. We request a record of this IMP action and all others in this area. The dedication of a right-of-way is no reason to drop acreage if that area met the naturalness criteria in 1976. Could BLM please explain what changes are being made, their justification, and BLM's legal authority. The size of the area changes frequently without explanation. [Utah Wilderness Coalition]

**71.5 RESPONSE:** The boundary of the WSA was revised following the IBLA decision remanding the unit for reconsideration. That boundary has not been revised since.

**71.6 COMMENT:** "In-held State sections and numerous pre-FLPMA leases would hinder manageability of the area as a wilderness." The State of Utah has adopted a policy of blocking its State lands together to reduce management problems. Project BOLD now is proposing several alternatives for acquisition of BLM lands and disposal of State lands. All the alternatives now proposed offer to give the State in-holdings in this WSA to BLM. None of the lands the State proposed to acquire include this WSA. [Utah Wilderness Coalition]

**71.6 RESPONSE:** See the responses to General Comments 6.1, 6.2, 6.3, and 6.4. The State of Utah position has changed to not exchanging lands inside wilderness. Project BOLD is not longer active.

**71.7 COMMENT:** In areas recommended for wilderness, pre-FLPMA oil and gas leases exist and State

lands are found. In these areas BLM claims there are no management problems. BLM needs to detail the differences and reasons for these management problems. The Wilderness Study Policy requires a consistent analysis and conclusions. The BLM has not provided this. [Utah Wilderness Coalition]

**71.7 RESPONSE:** The Final EIS projects a development scenarios for each alternative. In developing the scenario, valid existing rights, including mineral rights and State in-holdings were considered. According to these projections, for Flume Canyon WSA, 7 acres would be disturbed in the portion of the WSA that would be designated wilderness with BLM's Proposed Action, and 217 acres would be disturbed in the nondesignated portion. The impact analysis indicates that the disturbance in the designated area would not significantly constrain manageability of the area for wilderness.

**71.8 COMMENT:** BLM incorrectly interprets court rulings on access to mandate road construction. BLM ignores the State policy to exchange State in-holdings in areas recommended for wilderness. BLM does not cite any specific legal requirements supporting the opinion that the high percentage of the WSA with pre-FLPMA oil and gas leases would present a major management problem. [Utah Wilderness Coalition]

**71.8 RESPONSE:** See the responses to General Comments 6.1 and 6.3.

**71.9 COMMENT:** Wilderness designation for Flume Canyon would offer many multiple use benefits. [Utah Wilderness Coalition]

**71.9 RESPONSE:** The benefits of wilderness designation of the Flume Canyon WSA are recognized and discussed in the text of the Final EIS.

**71.10 COMMENT:** BLM recommends an excessive amount of land for nondesignation; its recommendation appears to be arbitrary and unsupported. BLM estimates that only some 1,192 acres of land in the nondesignated portion of the WSA would actually be disturbed if all mineral resources were developed. BLM does not explain how it arrived at the 1,192-acre figure. Nor does BLM provide a map to indicate exactly where the 1,192 acres lie. Of even greater concern is the fact that BLM has recommended for nondesignation 49,465 acres--more than 40 times the amount of land it claims would actually be affected by potential developments. BLM gives no reason

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

for this excessive acreage recommendation and no explanation of the methodology it used to determine the acreage. These lands present no resource conflicts and, by BLM's own analysis, clearly qualify for wilderness designation. [Utah Wilderness Coalition]

**71.10 RESPONSE:** See the response to Specific Comment 71.1. See Appendix 11 in Volume I for the rationale regarding the Proposed Action for the Flume Canyon WSA.

**71.11 COMMENT:** This area is so remote and rugged that it is largely unexplored!! The Draft EIS even admits this: ". . . it is probable that scenic and archaeological features not mapped or named could be found by wilderness users." This means that your agency, the nation's largest absentee landlord, has never bothered to survey this land for its scenic or archaeological values! Have you ever even been there? The logical corollary to that is that you are making a nonwilderness recommendation based on nothing but your own anti-wilderness biases. Why are these WSAs not included in your wilderness recommendations? I challenge you to give all of us a direct answer that is not couched in bureaucratic double-speak and glittering generalities. The Draft EIS states that these WSAs have "negligible potential" for minerals and that the terrain is so incredibly rugged that even if any mineral discoveries were made, mineral recovery would be "infeasible." There is absolutely no valid reason for not designating the entire 135,000-acre Book Cliffs roadless area as wilderness. I most certainly hope that this pristine and wild wildlife habitat and recreation area will be included in your wilderness recommendations in the Final EIS. [Scott DeLong]

**71.11 RESPONSE:** See the response to Specific Comment 69.7.

**71.12 COMMENT:** The old jeep trails on which the areas are divided are scarcely used and are being naturally revegetated, and there is scant sign of human activity, certainly none permanent, in this rugged, wonderful, wild area. Wildlife values are extremely high, due to the remoteness from large population centers, the dissected and tumbled terrain, the good water in the canyons, and the light human intrusions. The wilderness experience is absolutely incomparable. BLM has used oil, gas, and coal as a reason to exclude these areas from consideration, yet the possibility of coal development is not good, and oil and gas potential is described as "low" in the Draft EIS. We be-

lieve that high quality wilderness values are being ignored in favor of relatively low quality mineral potential. The northern Book Cliffs are riddled with roads and well sites. Why subject the finest wildlife habitat in the State to potential degradation or destruction, when far superior oil, gas, and coal potential can be found elsewhere? [Uintah Mountain Club]

**71.12 RESPONSE:** See the responses to Specific Comments 69.3, 69.7, and 69.8.

**71.13 COMMENT:** The dropping of Book Cliffs has been purely political to this point because of some local opposition perhaps, but Congress is the place for politics, not in BLM. BLM should find all these WSAs and Desolation Canyon as suitable and have the GS/BM reports completed. They have the most outstanding wilderness values in the State of Utah, and they have already shown they are very valuable for that use. [George Nickas]

**71.13 RESPONSE:** See the response to Specific Comment 69.12.

**71.14 COMMENT:** There does not appear to be any logic on how the BLM selected its preferred alternative of 1.9 million acres. I fully agree and support that the entire 1.9 million acres be designated wilderness because they exhibit exceptional wilderness characteristics. However, I don't understand why additional WSAs that exhibit the same wilderness qualities which should be recommended as wilderness are not. An example is the Book Cliffs area. While living in Vernal, I have spent considerable time exploring the Book Cliff area. The Spruce, Flume, and Coal Canyons WSAs should all be included as wilderness recommendations. Your own Draft EIS states "likelihood of development is moderate to low;" "The large size and blocky configuration of the WSA contribute to a feeling of vastness, and the rugged, temporary, and isolated nature provide outstanding opportunities for the visitor to find solitude,"; "Primitive and unconfined recreation opportunities are present uniformly throughout the WSA;" and that "The WSAs cover part of an area of critical watershed and provides habitat for big game animals that shy away from areas of human occupation." Yet these three WSAs are not recommended for wilderness. Nor is there given any reason why they are not recommended for wilderness. Why are the Spruce, Coal, and Flume Canyon WSAs not recommended for wilderness designation? [D. Kennell]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

**71.14 RESPONSE:** See the responses to General Comments 8.2, and 8.6, and Specific Comment 69.6.

**71.15 COMMENT:** These WSAs are not recommended as wilderness in the BLM "Proposed Action" and should be recommended as wilderness. In the Draft EIS BLM admits development potential in these areas is moderate to low; that the areas are extremely important to wildlife, important as watersheds, have valuable cultural resources, and the areas are isolated, rugged, and provide outstanding wilderness characteristics. The areas are highly erosive in nature and would be extremely difficult to develop without creating unacceptable resource damage. In addition, these areas are immediately adjacent to a State roadless area and the Hill Creek extension of the Ute Indian Reservation which are being managed as wilderness. [D.C.Kennell]

**71.15 RESPONSE:** See the response to Specific Comment 70.6.

**71.16 COMMENT:** The Desolation should be expanded past the southern confluence with the Price River on the east side of the Green River. The southern portion of Floy Canyon should also be recommended wilderness. The Desolation/Floy/Coal/Spruce/Flume Canyons along with the State roadless area and the Hill Creek extension could compromise the largest and best BLM wilderness in the State and could be renamed the Book Cliff-Desolation Wilderness. [D. Kennell]

**71.16 RESPONSE:** See the responses to General Comments 3.1, and 3.29, and Specific Comment 69.3.

**71.17 COMMENT:** BLM downplays the amount of environmental damage that would occur if development within the WSA were to take place. BLM bases its wilderness recommendation on the need to protect a coal resource which it claims could be developed sometime in the long-term future. BLM is required to present a worst-case scenario of the environmental consequences of such development. Yet, BLM minimizes this worst-case scenario by referring to the short-term impacts of development. Thus, on the one hand, BLM focuses on the long-term potential for coal development in order to justify only a partial wilderness designation, but, on the other hand, focuses on short-term environmental impacts of such developments. This is inconsistent and gives a distorted picture of the actual environmental consequences of BLM's wilderness recommendation. It also does not meet the requirement that BLM provide a worst-case scenario in

assessing environmental impacts. The Final EIS should not minimize or distort environmental impacts and it should be consistent in its use of either a long-term or a short-term frame. [Utah Wilderness Coalition]

**71.17 RESPONSE:** See the response to General Comment 9.12. The assumptions for environmental analysis have been revised and clarified for the Final EIS. In all cases, impact assessment is limited to that expected to occur in the foreseeable future. For example, coal development is not assumed to occur in the Book Cliffs area because of the presence of more favorable deposits located elsewhere. Location of surface disturbance is assumed to be concentrated in canyon bottoms and drainages. A Partial Wilderness Alternative was not presented for Flume Canyon in the Draft EIS, but is in the Final EIS.

**71.18 COMMENT:** The benefits of designating adjacent areas should be discussed. [John Veranth]

a. In the individual WSA sections, the "size" section states areas are of sufficient size to enhance wilderness values. Why was the additional benefit of the adjacent areas not discussed?

b. This is a large, contiguous roadless area consisting of 600,000 acres of BLM land. When adjacent State and Indian roadless lands are included, the potential roadless/wilderness area totals about a million acres. The synergistic benefits of the adjacent areas are not fully addressed in the Draft EIS. This large area would allow human impact sensitive wildlife species to spend the entire year in a roadless area since the elevation range encompasses both summer and winter range. Why was this benefit to wildlife not discussed?

**71.18 RESPONSE:** See the response to Specific Comment 65.14.

**71.19 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**71.19 RESPONSE:** A statement has been included in the Final EIS concerning these resources.

**71.20 COMMENT:** We feel that sediment load from even modest road construction and site preparation would result in unacceptable degradation of water quality in the Book Cliffs WSAs. Continued activities on-site, especially with ongoing mining activities or



**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

the establishment of oil and gas "fields," would likely cause continued erosion in this up-and-down canyon country. In the canyons with perennial streams, beaver dams--nature's own "instream drop structures"--would certainly be affected. Don't meddle. If there is to be soil loss, let it be under the All Wilderness Alternative. [Uintah Mountain Club]

**71.20 RESPONSE:** See the response to Specific Comment 68.11.

**71.21 COMMENT:** Exxon believes each of these areas contain geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which lead us to this recommendation. [Exxon Corporation]

**71.21 RESPONSE:** See the response to Specific Comment 65.5. The proposed Partial Wilderness Alternative would allow for exploration in a portion of the WSA.

**71.22 COMMENT:** The area is "known for oil and gas production." BLM offers no production information on this area. No oil production exists at this time and exploration activity has been limited to areas near the unit boundary. BLM overstates the oil and gas potential and their opinion is unsupported by the Mineral Resource Evaluation performed by Science Applications, Inc., and Oak Ridge National Laboratory. While the SSA concludes that this area has significant and unequalled wilderness values, the documented oil and gas potential indicates "abundant direct evidence is available from within and/or near the tract to support" the conclusion that oil and gas accumulation occurs in "small deposits." The Draft EIS claims that mineral development is unlikely to occur because of the limited quality and quantity of the resource and the difficulty in extraction. [Utah Wilderness Coalition]

**71.22 RESPONSE:** See the response to General Comment 15.1. The Flume Canyon WSA is located along the southern edge of the Uinta Basin, an important petroliferous province with significant oil and gas production potential. Three of the seven wells drilled in the WSA have gas shows or initial production of gas. Several holes within 3 miles of the WSA contain fluid hydrocarbons (see text of the Final EIS for details on mineral potential in and near the WSA). Based on current information, BLM projects that the oil and gas resource in the WSA will be explored and developed in the foreseeable future.

**71.23 COMMENT:** The Draft EIS states, "the coal found within the WSA is of poor quality and occurs in thin (less than 1-foot) beds." Development of this coal area is infeasible. BLM should strike the Summary of Significant Environmental Consequences. Listing this in that column is inconsistent with the analysis process. Coal is not a significant resource in this area and should not be considered in the decision. [Utah Wilderness Coalition]

**71.23 RESPONSE:** See the responses to Specific Comments 71.17 and 71.22. BLM does not project that coal will be developed in the WSA in the foreseeable future. The potential for coal development is not discussed in the Summary Table for the Flume Canyon WSA. However, as discussed in the response to Specific Comment 71.22, BLM does project that the oil and gas resource located in the WSA will be explored and developed in the foreseeable future.

**71.24 COMMENT:** Leases carry different stipulations for the protection of resources. This area also has had additional protective management direction placed on it. No information is given on the requirements placed on leases. In the absence of this information, the BLM assumption that these leases pose a management problem is unsupported by documented legal direction or management directives. [Utah Wilderness Coalition]

**71.24 RESPONSE:** The management problem referred to is the potential loss of wilderness values that would result from the exploration and development of pre-FLPMA oil and gas leases that do not carry the wilderness nonimpairment stipulation. These leases could be developed without consideration of wilderness values as is explained in the Descriptions of the Alternatives. Post-FLPMA leases contain nonimpairment stipulations.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 71: FLUME CANYON WSA (CONTINUED)

**71.25 COMMENT:** About 85 percent of the area is under oil and gas leases (532 leases). Another 62 percent of the WSA is covered by pre-FLPMA leases. The SSA gives no estimates on gas or oil volumes or commercial development economic return. [Utah Wilderness Coalition]

**71.25 RESPONSE:** See the response to General Comment 15.1. As of December 1988, the Flume Canyon WSA contained four pre-FLPMA oil and gas leases (695 acres) and three post-FLPMA leases (360 acres) for a total of 1,055 acres or about 2.1 percent of WSA. Please refer to the text for details on the oil and gas resource in the WSA.

**71.26 COMMENT:** Coal beds with the greatest potential for mining crop out in the Cottonwood Canyon area in the extreme southern end of the tract (this part of the tract was dropped from wilderness consideration in BLM's intensive inventory). The few coal analyses from this part of the Sego field indicate that the coal is mostly impure (as reported by Fisher, 1936, in Doelling and Graham, 1972). [Utah Wilderness Coalition]

**71.26 RESPONSE:** See the responses to Specific Comments 71.17 and 71.23.

**71.27 COMMENT:** A portion of the northwestern part of this area is designated as a "tar sand area" (1,450 acres) and "oil shale withdrawal" (3,890 acres). None of these areas are under lease. No estimate of the commercial value of these resources are made. [Utah Wilderness Coalition]

**71.27 RESPONSE:** As explained in the text, the WSA does contain tar sand and oil shale resources. However, these are considered to be marginal and no development is projected for these resources in the foreseeable future. No oil shale or combined hydrocarbon leases exist in the WSA. The text summarizes in-place resources potentially located in the WSA. However, because no development is projected to occur, these resources are not analyzed in detail.

**71.28 COMMENT:** The low coal potential should not preclude wilderness designation. BLM admits in the Draft EIS that oil shale, coal, and oil development is "infeasible at this time." Why then, has BLM given "infeasible" mineral development importance over "crucial" wildlife habitat? [Sierra Club, Cache Group]

**71.28 RESPONSE:** See the responses to General Comment 15.1 and Specific Comments 71.22 and 71.23.

**71.29 COMMENT:** Dry holes at the Bogart Canyon site and other sites around the Book Cliffs should convince oil companies that no profit is to be made there. These findings support conservationist claims that wilderness is the most appropriate land use for the WSAs in this region. BLM should deny further leases and exploration claims on Book Cliffs WSAs (Turtle Canyon, Floy Canyon, Coal Canyon, Spruce Canyon, and Flume Canyon), which have already been extensively explored, and recognize the paramount wilderness attributes of these areas. [Wasatch Mountain Club]

**71.29 RESPONSE:** See the responses to Specific Comments 68.13 and 69.23.

**71.30 COMMENT:** Together, the Coal, Spruce, and Flume Canyon WSA's are estimated to have about 9 million bbl of recoverable oil and 54 billion of natural gas, recoverable from small, scattered fields. To put this in perspective, this represents about 0.04 percent of all the proven natural gas reserves in the U.S. (in 1979), or enough oil to supply the needs of the U.S. for about a half day. Rooding and well sites have the potential for being extremely disruptive to sensitive species, reducing crucial habitats during periods of disturbance (Coal Canyon). We feel that BLM should not make exploration and development attractive by releasing these areas from the constraints of wilderness management. These areas could be irrevocably altered and another piece of American Wilderness forever lost. [Uintah Mountain Club]

**71.30 RESPONSE:** See the responses to Specific Comments 69.25, 71.15, and 71.22.

**71.31 COMMENT:** There are no coal leases in these WSAs. This reflects the grade of coal there, the availability of coal elsewhere, and the feasibility of recovery. The coal in Flume Canyon WSA is described as "very poor quality." Only 22 percent of the Coal Canyon acreage is considered to have recoverable coal. The 38 million tons of recoverable coal in Coal Canyon is only about 0.5 percent of Utah's total coal reserves. In Spruce Canyon WSA you say that "oil, gas, tar sand, coal . . . likely would not be recovered." Potential exists for small amounts of coal--5 to 30 million tons. "Low tonnage" of coal exists in Flume Canyon WSA, with production unlikely." An optimistic

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 71: FLUME CANYON WSA (CONTINUED)

estimate of recoverable coal in these three WSAs amounts to about 2 percent of Utah's total coal reserves. In the analysis of these WSAs, nowhere do you include a map demonstrating KRCRAs. The reader cannot possibly surmise just where possible conflicts exist. In all cases, you correctly point out that "the loss of development would not be significant." In the Spruce Canyon analysis, you point out the potential hazards to water resources from coal mining: "If an underground coal mine is developed, geologic formations could be fractured, affecting ground water by aquifer bleeding. Springs, if located in the WSA, could dry up or experience reduced flows." In an area where dependable water resources and perennial flow is essential for wildlife and grazing, it is highly inadvisable to allow any development to proceed that would jeopardize this resource. The coal resource is just not that important now. We won't even discuss the inadvisability of strip mining. The negative impacts should be obvious; strip mining should be prohibited at all cost. [Utah Mountain Club]

**71.31 RESPONSE:** See the responses to Specific Comments 71.22 and 71.23. Coal development is not projected in the foreseeable future for the Flume Canyon WSA.

**71.32 COMMENT:** The Draft EIS is unclear in many aspects. The location of KGSs and KRCRAs is not shown. The location and description (pre- or post-FLPMA) of leases is not provided. One or two small maps would have sufficed. Thus, it is impossible for the citizen reviewing the document to see specific areas of potential conflict, and thereby suggest other alternatives to the two that you have advanced: No Action and All Wilderness. [Utah Mountain Club]

**71.32 RESPONSE:** See the responses to Specific Comments 69.27 and 71.1.

**71.33 COMMENT:** In the Book Cliffs field, several WSAs (Spruce, Flume, Floy, and Coal Canyons) contain coal deposits. USGS investigations of Floy Canyon WSA, typical of these WSAs, indicate that the coal seams are too thin (less than 4.5 feet) to be economically recoverable. [Utah Wilderness Coalition]

**71.33 RESPONSE:** See the responses to General Comment 15.1 and Specific Comment 71.23.

**71.34 COMMENT:** Oil Shale and Tar Sand: The resource information should be more detailed, also geo-

logic structure has little effect on oil shale deposits. [State of Utah]

**71.34 RESPONSE:** See the response to Specific Comment 71.27. The discussion on oil shale and tar sand has been clarified regarding geologic structures.

**71.35 COMMENT:** The fact that only microscopic gold and silver have been discovered on the placer claims in the area does not necessarily reduce economic potential. In all probability, the placer claims in the WSA were staked for lode gold deposits located in the Mancos shale. To date, economic gold has not been produced from the Mancos; but, metalliferous black shales like the Mancos are currently being researched as a potentially significant source of metals. [State of Utah]

**71.35 RESPONSE:** BLM recognizes that economic conditions and changes in technology may make certain resources more valuable in the future. Nevertheless, the analysis can only be based on what is reasonably foreseeable at the present. See the response to General Comment 3.37.

**71.36 COMMENT:** BLM is placing the importance of the potential development of a marginal oil and gas resource above the importance of preserving an outstanding and unique wilderness and wildlife resource. Just how important is the potential oil and gas resource in these three WSAs? In their summary of significant environmental consequences for each of these units, BLM indicates that due to the low likelihood of recovery, the collective loss of development of gas and oil resources within these WSAs would not be significant! Yet the threat of losing the opportunity to extract these insignificant quantities of fossil fuels is "driving" the decision to not recommend unquestionably deserving wildlife and critical wildlife habitat for wilderness. This situation is especially absurd, when one realizes that there is ample opportunity to develop far more favorable energy leases outside the WSAs in the Book Cliffs. It is highly unlikely that any American will ever receive one Btu of benefit from fossil fuels from within the boundaries of these WSAs and yet without designation as wilderness, motorized activities associated with mineral exploration, ORV use, and livestock development will, over time, compromise the outstanding wilderness and wildlife resources over much of these WSAs. [Slickrock Outdoor Society]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

**71.36 RESPONSE:** See the responses to Specific Comments 71.1, 71.23, and 71.25. Also, see Appendix 11 in Volume I for the rationale for BLM's Proposed Action.

**71.37 COMMENT:** The OIR (3-) for minerals is suspect. No resources received a rating higher than f2, and only oil and gas has any potential for development. Add to that Draft EIS description of the area as having a "generally unfavorable geologic environment" and a low likelihood of development, and it appears the 3 rating is exaggerated. [Utah Wilderness Association]

**71.37 RESPONSE:** See the response to Specific Comment 71.22. The OIR rating was confusing and has been eliminated from the Final EIS.

**71.38 COMMENT:** BLM should consider the value of the area to wildlife. [Sierra Club, Cache Group and Utah Wilderness Coalition]

a. The WSA favors wildlife particularly. Three species which are very sensitive to human intrusion: black bear, mountain lion and elk. Small wilderness areas are not able to support sensitive wildlife. The size of a protected area necessary to support these sensitive species needs to be considered.

b. We find it hard to believe that BLM could not find any suitable wilderness in this entire WSA. This very wild WSA contains important habitat which can best be protected through wilderness protection. The Draft EIS says that "the entire" WSA provides crucial habitat for species that are very sensitive to human intrusion." This includes: (1) bears, (2) elk, and (3) mountain lions.

**71.38 RESPONSE:** See the response to Specific Comment 69.3.

**71.39 COMMENT:** The BLM vastly understates the impacts of development on sensitive wildlife populations. Since BLM has not performed wildlife populations, archaeological, and endangered species inventories, no possible cumulative impact analysis is possible. The measured loss of the resources and others due to the cumulative impacts from fossil industry development (from population growth, industrial sites and exploration, and from ORV growth) are not discussed. [Utah Wilderness Coalition]

**71.39 RESPONSE:** See the responses to General Comment 9.6 and Specific Comments 69.3, 69.7, and 71.38.

**71.40 COMMENT:** If the proposals for these WSAs were not so serious in their consequences they would be laughable! These areas are not really three separate areas at all--they are one large 135,000-acre roadless wilderness area. How can you claim that this is not wilderness?! Any wildlife biologist would laugh at your claims! The Draft EIS itself points out that this is one of the most pristine and important wildlife habitats in the entire State of Utah! These WSAs favor wildlife because of their relative lack of human impacts." Relative to what--the face of the moon!? These areas are crucial big game habitat for black bear, cougar, and elk--animals that even your own Draft EIS admits are "very sensitive to human intrusion." I have read the entire Draft EIS, a very dismal task, and believe that this is the only BLM wilderness that contains black bear. [Scott DeLong]

**71.40 RESPONSE:** See the response to Specific Comment 69.36.

**71.41 COMMENT:** Page 15 contains reference to mountain lion and cougars as two species present in the WSA. Both of these common names refer to a single species, *Felis Concolor*. Also this page contains two misspelled common names: "ferruginous" (sic) and "curfew" (sic). [Scott Mills]

**71.41 RESPONSE:** The text has been corrected.

**71.42 COMMENT:** These areas support an impressive variety and number of species. Food, cover, and water are abundant. This is indispensable wildlife habitat. Large areas of these WSAs are considered "crucial" year-round habitat and winter range. An inconsistency appears here. In the Draft EIS, Coal Canyon WSA is identified as having 95 percent of its acreage as "crucial" winter range, with 2,457 acres as "crucial" year-round habitat for deer, elk and mountain lion. Spruce and Flume Canyon WSAs have no areas identified as "critical habitat." Yet the physiography of the regions is practically identical and the contiguous WSAs are separated by deeply eroded canyons and rugged relief which obviously limit east-west migration. Put another way, why should the 58,173 acres of Coal Canyon WSA be "crucial" winter range to the 40 elk that winter there, while the 80 elk that winter in Spruce Canyon WSA and the 40 elk that migrate to Flume Canyon WSA have no

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

"critical habitat"? We suspect that all three WSAs have large segments of critical habitat. Seasonal migration takes place largely along the generally north-south trending canyons, from higher to lower elevations and back again. In winter, animals stay in the deeply wooded canyons, by perennial water courses, and off the exposed ridgetops. The assignment of "no critical habitat" in Spruce and Flume WSAs does not meet the test of reasonableness, when a contiguous and physically similar WSA is practically covered with "crucial" winter range. Another inconsistency appears in the Spruce and Flume Canyon WSA analyses, when you state that "the entire WSA provides crucial habitat for species that are very sensitive to human intrusion, including elk, bear, and mountain lion" (Flume Canyon). Yet, in the same paragraph, you state that there is "no critical habitat" in the WSA. What is the difference between "critical" and "crucial"? The Glossary doesn't identify this distinction. My thesaurus does not distinguish between the two words. Spruce Canyon has the same "sensitive" species as the other two WSAs, but, oddly enough, has no "crucial" or "critical" habitat. We find these inconsistencies very difficult to digest. In point of fact, UDWR ascribes crucial habitat to the entire southern and eastern Book Cliffs, reflecting the fact that these areas represent the finest, least-impacted wildlife habitat in the State. [Uintah Mountain Club]

**71.42 RESPONSE:** See the response to Specific Comment 69.37.

**71.43 COMMENT:** You correctly point out the unique nature of the resource and possible adverse effects of development (Coal Canyon, Spruce, Canyon, Flume Canyon). You also point out the development pressures which now exist in other areas of the Book Cliffs, and the compounding effect that additional development would have if allowed to occur in these WSAs. Yet you fail to take the next logical step, by concluding that, if habitat for sensitive species is to be maintained in a time when pressures on wildlife are ubiquitous and unrelenting, then these three special areas must be saved in a block from future development. You have sided with development, pure and simple. You assume that pressured animals will just go "over the hill." You don't acknowledge a simple ecologic fact: that all habitats are not created equal. The habitat that will likely be impacted most will be the riparian zones and canyon bottoms at lower elevations--critical areas to most large over-wintering wildlife. Your failure to address the needs of wildlife by simply writing off the effects of development is either

callous, uninformed, or disingenuous--or a combination of all of these. No attempt is made to identify the relative importance of this resource in Utah, and, aside from citing "stipulations," we are not told how BLM intends to protect the resource." We feel that wilderness designation is the best way to protect the Book Cliffs' wildlife. Legislative protection leaves little room for broad interpretations or diverse managerial philosophies. With resource preservation, perhaps we won't wind up with the "mess" that occurred in the northern part of the Book Cliffs. If you want an idea of how important habitat preservation can be, we recommend that you talk to folks who hunted the northern Book Cliffs several years ago. For some species, "peaceful coexistence" just doesn't occur with extensive roading and site development. [Uintah Mountain Club]

**71.43 RESPONSE:** See the responses to Specific Comments 69.3, 69.7, 69.11, 69.37, 70.25, and 70.26. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action. A Partial Wilderness Alternative has been proposed for the Flume Canyon WSA which would preserve the best wilderness values and eliminate the greatest resource conflicts.

**71.44 COMMENT:** The East Central Region, Desolation Canyon and the Book Cliffs WSAs (Floy, Coal, Spruce, and Flume Canyons) provide excellent sylvian hiking/backpacking opportunities, combined with opportunities to view deer, elk, and bear. Popularity of this region would increase if a reasonable set of hiking trails was established. We recommend the entire WSA complex be retained as wilderness, with well defined trailheads and hiking trails to provide visitors with a unique forest wilderness experience. [Wasatch Mountain Club]

**71.44 RESPONSE:** See the response to Specific Comment 66.9.

**71.45 COMMENT:** Probably the biggest tragedy in the whole BLM wilderness review in Utah, is BLM's recommendation of only 23,000 acres in over a quarter million acres of wilderness land in the eastern Book Cliffs. BLM recognizes in the EIS that virtually this entire quarter million acres of land is crucial habitat for elk, black bear, and cougar. The reason it's crucial is because it's all that's left that's roadless in the Book Cliffs. It's amazing where these species have been driven. It's especially crucial for black bear. It's probably the last stronghold in the State of

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

Utah for black bear. The reason that all of these areas have been left out of the review is again potential oil and gas development. BLM should have all of the information they can get on these areas before they make a recommendation to Congress. These areas that are omitted in the eastern Book Cliffs have recognized high wilderness values. BLM recognized they may be the highest wilderness values in the State of Utah, and yet by recommending as unsuitable now, BLM eliminates the opportunity for these areas to have the GS/BM studies that will be done on all the suitable areas. There is no reason not to recommend these areas as wilderness at this stage in the process. BLM admits that all of the information on the oil and gas resource is highly speculative. It may or may not exist in this area. The decision to leave those areas out is purely political. At this state, BLM should base their decisions on resource data, make sound resource decisions, and leave the politics to Congress. That's why Congress has reserved the right for themselves to make final determination on wilderness areas. [George Nickas]

**71.45 RESPONSE:** See the response to Specific Comment 68.21.

**71.46 COMMENT:** The assessment of impact for Spruce Canyon states that in the event of noncompatible development, sensitive animals, quote, "Could move into adjacent areas because the WSA encompasses only a small portion of recognized habitat for these species." This is unlikely. It is more likely that the suitable habitat for this species exists in the adjacent areas and is already saturated by local populations. Furthermore, the BLM proposal recommends nondesignation for all of the Flume Canyon WSA bordering on the north and east and the Coal Canyon WSA bordering on the south. In this case, BLM should either redesignate the adjacent WSAs or redo this statement giving much more consideration to the effects of nondesignation on wildlife values. [Richard Frederickson]

**71.46 RESPONSE:** See the response to Specific Comment 70.26.

**71.47 COMMENT:** The areas I am particularly concerned with are Jack, Desolation, Turtle, Floy, Coal, Spruce, and Bruin Canyons. The BLM has looked at mineral values and considered mineral values versus wilderness values. But I think probably BLM is supposing a little too much in the mineral area. Maybe I can illustrate with a case in point. The Book Cliffs area

and the Desolation Canyon area include some of the most rugged and remote country in Utah. These places have wildlife: black bear, bighorn sheep, mountain lion, deer, and elk. You can grow deer most anywhere. You can grow elk in a lot of places. But, there really aren't very many places where you can get a good population of bear and lions. The only reason that they weren't recommended that I can figure out is their low to moderate potential for mineral development. Even if they had great potential for mineral development, the potential for wildlife and wilderness experiences are greater. [J.D. Barnett]

**71.47 RESPONSE:** See the response to Specific Comment 69.41.

**71.48 COMMENT:** Threatened and endangered species are summarily dismissed. The Draft EIS (Volume I) notes no terrestrial threatened and endangered species are found in WSAs and the only nonaquatic threatened and endangered animals are migrant bald eagles and peregrine falcons. It fails to note bald eagles are not mere migrants to Westwater Canyon WSA (they are permanent residents). Only the North Horseshoe Canyon WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise, the findings on terrestrial threatened and endangered species are flawed. The FWS letter (Draft EIS, Appendix 4) indicates the black-footed ferret may inhabit several WSAs (Dirty Devil, Horseshoe Canyon North and South Behind the Rocks, Desolation Canyon, Floy Canyon, Spruce Canyon, Flume Canyon, Westwater Canyon, Lost Spring Canyon, and Daniels Canyon). It also indicates the desert tortoise may inhabit Red Mountain and Cottonwood Canyon WSAs. [Utah Wilderness Association]

**71.48 RESPONSE:** See the response to Specific Comment 68.23. The Wildlife Including Special Status Species sections in the Final EIS has been reviewed and updated.

**71.49 COMMENT:** Based on the BLM analysis, these land treatments for livestock seem unlikely. In the development alternative, other developments would preclude this activity. In both wilderness and nonwilderness alternatives, sensitive soil types with serious erosion problems identified by BLM would preclude vegetation destruction as proposed. BLM makes no estimates on the economic costs or benefits of land treatments. BLM also makes no estimates on their ability to manage this activity. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

**71.49 RESPONSE:** See the response to Specific Comment 69.44. The land treatment identified in the text is discussed in the Grand RMP. If implemented, this treatment would occur in canyon bottoms and drainages where sagebrush parks are located. In the Flume Canyon WSA, the proposed vegetation treatment would consist of the burning and seeding of about 106 acres. Good soil is present in this area and rehabilitation potential is very good. BLM believes that both big game habitat and livestock forage would be improved.

**71.50 COMMENT:** No survey of threatened or endangered plants is referenced and it is assumed that no comprehensive survey has been conducted. BLM admits that no survey of cultural (archaeological sites) resources has been done. An Indian campsite and a pictograph have been found in this area. [Utah Wilderness Coalition]

**71.50 RESPONSE:** See the responses to General Comments 9.6 and 13.1 and Specific Comments 66.20, 68.4, and 69.7.

**71.51 COMMENT:** For cultural resources, how was the prediction of known cultural sites made? [State of Utah]

**71.51 RESPONSE:** Site density estimates for Flume Canyon have been revised, based on Class II as 1 percent sample of the region. Refer to the Affected Environment section for the revised prediction.

**71.52 COMMENT:** BLM proposes in the No Wilderness Alternative to designate this area open to all off-road vehicles. This conflicts with management of critical elk winter range, fragile soil protection needs, and critical watershed values. BLM notes that "erosion through the WSA is critical because of steep slopes and tendency towards flash flooding." Off-road vehicle use would aggravate this situation. [Utah Wilderness Coalition]

**71.52 RESPONSE:** See the response to Specific Comment 69.33.

**71.53 COMMENT:** I visited the area on a backpack trip this spring and found that the most logical travel routes lie along the headwaters of the various drainages at the northern end of the WSAs. An easily traveled route, much of it a cattle trail, exists from the road at the end of Sejo Canyon along the Roan Cliffs all the way to Cottonwood Canyon. The "recreation"

sections of the individual analysis documents should address the enhanced travel opportunities. [John Veranth]

**71.53 RESPONSE:** See the response to Specific Comment 69.49.

**71.54 COMMENT:** The recreation analysis is mistaken when it claims there is no evidence of use away from roads and ways. Many UWA members use the backcountry of the Flume Canyon unit for hiking, horseback riding, camping, and hunting. We are not the only ones. All of the roadless Book Cliffs are becoming more popular for backpacking and horsepacking. BLM should not sell this resource short in its analysis. [Utah Wilderness Association]

**71.54 RESPONSE:** See the response to Specific Comment 69.48.

**71.55 COMMENT:** The entire 50,000-acre area in the UWC's proposal contains numerous outstanding opportunities for primitive recreation and solitude within a very natural setting. Flume Canyon is a natural extension to the Book Cliffs roadless area to the east, and it links Spruce Canyon and Coal Canyon. [Sierra Club, Cache Group]

**71.55 RESPONSE:** See the responses to General Comment 3.1 and Specific Comments 69.3 and 71.1. See Appendix 11 in Volume I for a summary of the rationale for the BLM Proposed Action. A Partial Wilderness Alternative has been proposed for the Flume Canyon WSA which would preserve some wilderness values and eliminate the most accessible areas with oil and gas potential. The BLM Proposed Action, as described in the Final EIS, would provide a belt of wilderness across the length of the Book Cliffs area.

**71.56 COMMENT:** In view of the major impacts the BLM proposes in the nonwilderness alternative, the assessment of the ability of BLM to manage for protection while allowing development needs explanation. Coal development, oil and gas exploration, ORV use, vegetation removal, and other activities will compromise the critical elk habitat, increase the erosion problem, and impact other wilderness values. The multiple use benefits from wilderness designation are clearly misrepresented. The multiple use benefits in a wilderness area need to be reported in depth for each resource in the SSA. [Utah Wilderness Coalition]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 71: FLUME CANYON WSA (CONTINUED)**

**71.56 RESPONSE:** The anticipated impacts have been reviewed and analyzed in the Final EIS. Specific assumptions and analysis guidelines are made. In the Flume Canyon WSA, it is assumed that projected surface disturbance would occur in canyon bottoms and drainages. In total, less than 1 percent of the surface of the WSA would be directly disturbed. The majority of this surface disturbance would be vegetation treatments (burning and seeding) that would be rehabilitated and the habitat actually improved. As discussed in the text, BLM recognizes that development of the oil and gas resource would result in the loss of wilderness values.

**71.57 COMMENT:** BLM states that this alternative (no wilderness) represents management practices developed under the Draft Grand RMP. This plan, which is due in 1987, has not been out for public review. This wilderness study is in conflict with the study policy. Wilderness study should be done in the planning process. [Utah Wilderness Coalition]

**71.57 RESPONSE:** See the responses to General Comments 2.24 and 2.26.

**71.58 COMMENT:** The EIS should address the Book Cliffs transportation plan. [Utah Wilderness Coalition and George Nickas]

a. While BLM has not performed inventories of archaeological values and endangered animals and plants, they have developed the Book Cliff Mountains Transportation Plan which indicates the engineering feasibility of constructing access roads into the area.

b. In its recommendation the BLM has left out 90 percent of the Book Cliffs because of speculative mineral values, although, consistently they describe those mineral values as having a low likelihood of development. The oil and gas resources there is said to be (if it exists) in small scattered pools. Well, I have seen the transportation plan for the Book Cliffs, and believe me, they won't be wilderness if they are not designated. They won't be wilderness for very long.

**71.58 RESPONSE:** See the responses to General Comment 9.6 and Specific Comments 68.23 and 69.45. The text has been clarified regarding the Book Cliffs Transportation Plan.

**71.59 COMMENT:** "The WSA is contiguous to 48,000 acres of State land declared as a roadless area by the State of Utah on August 21, 1975." Wil-

derness designation would be compatible with adjacent State management. Nonwilderness designation would critically affect sensitive game management on both BLM and State land. [Utah Wilderness Coalition]

**71.59 RESPONSE:** See the responses to Specific Comment 65.14 and 68.21.

**71.60 COMMENT:** "The County's stated policy for public lands is: Utilize public lands under multiple use management." BLM incorrectly concludes that this policy conflicts with wilderness designation which is managed under multiple use. [Utah Wilderness Coalition]

**71.60 RESPONSE:** See the responses to General Comments 1.2, 23.4, 23.5, and 23.8.

**71.61 COMMENT:** BLM did consider an Area of Critical Environmental Concern designation in the western part of the unit (4,620 acres). Since ACEC designations have minimal legal authority requiring resource protection, the expected impacts with this designation are similar to the impacts with no designation. BLM's history of evading resource protection at the convenience of operators strongly supports this conclusion. [Utah Wilderness Coalition]

**71.61 RESPONSE:** See the response to Specific Comment 69.52.

**71.62 COMMENT:** Flume Canyon WSA has moderate wilderness-quality values and moderate conflicts compared to the other WSAs in the region. There are conflicts with moderate levels of oil and gas, coal resources, and livestock interests. Important wildlife values could be protected by ACEC designation or restrictive development stipulations if the area is not designated wilderness. [State of Utah]

**71.62 RESPONSE:** See the response to Specific Comment 69.52.

**71.63 COMMENT:** BLM assumed that massive development has overall positive benefits. No comprehensive analysis supports this assumption. [Utah Wilderness Coalition]

**71.63 RESPONSE:** See the response to Specific Comment 71.56. As clearly explained in the text of the Final EIS, BLM does not project massive development in the WSA. Further, as shown in the text, BLM recognizes that development of the oil and gas



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 71: FLUME CANYON WSA (CONTINUED)

resource in the WSA would result in the loss of wilderness values in portions of the WSA.

**71.64 COMMENT:** No analysis is made of the availability of resources outside this area to meet local economic demand. BLM makes no estimate of the national or regional fraction of producible nonwilderness resources that lie in this WSA. [Utah Wilderness Coalition]

**71.64 RESPONSE:** See the responses to General Comment 15.16 and Specific Comment 71.30. The amount of energy resources thought to occur in the WSAs is presented with State and nationwide perspectives in Volume I.

**71.65 COMMENT:** BLM failed to consider the majority of the jobs generated would be for short-term migrant labor and few for local people. [Utah Wilderness Coalition]

**71.65 RESPONSE:** See the response to Specific Comment 69.57.

**71.66 COMMENT:** We request that BLM not minimize the environmental consequences of long-term development in the WSA; that BLM present a more accurate estimate of the potential jobs that would be foregone with wilderness designation; and that BLM conduct a thorough survey of the cultural resources of the area before making a final wilderness recommendation. [Utah Wilderness Coalition]

**71.66 RESPONSE:** See the response to Specific Comment 69.57. BLM has attempted to accurately portray the anticipated impacts of wilderness designation on potential energy related jobs. These estimates are based on standard projections typical of exploration and development activities for the area. Regarding surveys of cultural resources, refer to the response to Specific Comment 71.50.

**71.67 COMMENT:** BLM overestimates the potential loss of jobs due to wilderness designation. In analyzing the number of jobs that would be foregone as a result of wilderness designation in the WSA, BLM estimates that each acre of land in the WSA could generate about 0.001 job. This figure is based on the level of employment generated by lands in the most productive areas of Grand County. Based on this figure, BLM estimates that an All Wilderness Alternative would result in the maximum loss of 75 potential jobs and the Partial Wilderness Alternative would result in a maxi-

mum loss of 22 jobs. Yet BLM offers no justification for applying the 0.001 job/acre figure to lands inside the WSA. In fact, BLM repeatedly refers to the fact that the potential for energy development within the WSA is significantly inferior to energy development outside the WSA. There is no apparent reason, therefore, to believe that WSA lands would generate the same number of jobs per acre as the most productive lands in Grand County. [Utah Wilderness Coalition]

**71.67 RESPONSE:** See the response to Specific Comment 71.66. The economic impact of designation or nondesignation of the Book Cliffs WSAs is discussed in detail in Economic Section of the Final EIS. In summary, the WSAs in the Book Cliffs have been determined to have a high potential for oil and gas. Therefore, exploration and development (and associated jobs) are projected to occur.

**71.68 COMMENT:** Wilderness designations would enhance local tourism and is consistent with State plans and policies for land management in the area. [Slickrock Outdoor Society]

**71.68 RESPONSE:** See the response to Specific Comment 69.61.

## SECTION 72

### WESTWATER CANYON WSA

**72.1 COMMENT:** The southwest corner of the WSA should be included in BLM's Proposed Action. [Utah Wilderness Coalition and Mark Pearson]

a. One of the remarkable features of the WSA is the sense of surprise one gets when hiking into the area from the Coates Creek road. One hikes up a pinyon-juniper covered hillside to its top to discover an incredible world of magnificent Wingate-walled canyons and dramatic views across the Grand Valley of the Book Cliffs and Tavaputs Plateau. The 2,800 acres on the southwestern boundary thus provide a valuable buffer, both physically and psychologically, for wilderness users. The contrast of this corner of the area with the core of the WSA is further reason to include it within BLM's wilderness recommendation, particularly in light of the lack of any conflicting nonwilderness uses such as minerals or fuelwood.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 72: WESTWATER CANYON WSA (CONTINUED)

b. In the southwest corner, BLM argues, "It would be difficult to prohibit vehicular use on existing trails." Field investigation by our members found that there is no present problem. Under the normal BLM ORV management (no action), the area still retains its wilderness character. Moderate management actions, similar to those now practiced in national parks, on forest lands, and on some BLM Lands would insure protection. Sign posting, construction of barriers, public information, and enforcement are some of the possible management tools. The BLM has no evidence of any management problem in this area. No indication of the effectiveness of different management options is discussed.

c. See attachment.

**72.1 RESPONSE:** BLM considers ORV use to be an administrative problem that would be difficult to prevent in portions of the Westwater WSA. The access in the southwest corner of the WSA receives moderate traffic, particularly during the fall hunting season when used for hunter access. There is increasing evidence noted during Interim Management Protection patrols of increased ORV use in and around the perimeter of the Westwater Canyon WSA. See the response to General Comment 9.14. BLM's Proposed Action is the Partial Wilderness Alternative.

**72.2 COMMENT:** On the western side of the unit, northwest of the Colorado River, BLM proposed to drop another part of the unit from wilderness designation. "The western boundary of the WSA follows section lines and is difficult to locate on the ground." "Boundaries here would have to be marked in the field." The majority of the boundaries on the western side now don't follow human impacts or the boundary of nonpublic lands as required by the inventory policy, now are the sole basis supporting deletion in the area recommended for wilderness designation. [Utah Wilderness Coalition]

**72.2 RESPONSE:** Appendix 11 in Volume I has been added to the Final EIS to explain BLM's rationale for the Proposed Action. See the response to General Comment 3.1.

**72.3 COMMENT:** The deletion proposed occurs in T. 20 S., R. 26 E., Sec. 5. This particular area is bounded on one side by a State section and on the other side by a cliff face. The cliff face is part of the study area boundary where BLM failed to follow their policy in choosing the boundary. The "configuration problem"

BLM used to drop this area was created by the incorrect inventory boundary. The State section is one of those now proposed by Project BOLD to be offered to the Federal government and is not a management problem. Even with these constraints, the area still is manageable as a wilderness area. BLM offers no objective evidence supporting their opinion. [Utah Wilderness Coalition]

**72.3 RESPONSE:** Project BOLD is no longer proposed by the State of Utah. See the responses to General Comments 3.1, 6.3, and 6.4.

**72.4 COMMENT:** The handling of road corridors in the EIS has been inconsistent. For example, in the Grand Gulch ISA Complex, a narrow road corridor was "cherry-stemmed" into the WSA in several places. In the Sids Mountain WSA, road corridors one-third of a mile wide (according to the map in Volume VI) were "cherry-stemmed" into the WSA. Narrow corridors such as those in the Grand Gulch ISA Complex should be used in all WSAs. In some WSAs, a "way" was used to limit the size of the WSA, while in other WSAs, similar "ways" were determined to be not significant and were included as wilderness. Examples of the former are the Westwater Canyon Partial Wilderness Alternative and the Partial Wilderness Alternative for the North Escalante Canyons/ The Gulch ISA (the "way" in Horse Canyon is used to exclude a major part of the WSA). Examples of the latter are in the Grand Gulch ISA Complex: a "way" extends from Sheiks Flat to the rim of Bullet Canyon; another, in Polly's Pasture, goes to the head of the Government Trail. Both "ways" were treated as wilderness. If "ways" in all of the WSAs were handled like they were in the Grand Gulch ISA Complex, the size of many WSAs would be substantially increased. [Owen Severence]

**72.4 RESPONSE:** Partial alternatives were drawn that included the best wilderness values and which eliminated potential conflicts. In the Westwater Canyon WSA approximately 10 miles of ways and associated acreage were eliminated. See Appendix 11 in Volume I for BLM's rationale.

**72.5 COMMENT:** Wilderness designation of this WSA will protect important Colorado River riparian habitat. [Sierra Club, Cache Group]

**72.5 RESPONSE:** The EIS notes the presence of riparian habitat.

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 72: WESTWATER CANYON WSA (CONTINUED)**

**72.6 COMMENT:** BLM doesn't admit any problems if the area is not designated wilderness. The BLM fails to mention endangered species habitat and soil erosion management problems. BLM specifically mentions plans for commercial sand and gravel pits within the WSA along the river as not being a problem. [Utah Wilderness Coalition]

**72.6 RESPONSE:** The Draft EIS and Final EIS both state that, "Virtually no sand and gravel resources occur within the WSA, although one small terrace deposit has been identified in the vicinity of Big Hole. There has been no interest in this deposit to date because of its small size and inaccessible location." Both documents also state that no development would be projected under any of the alternatives. Also, see the responses to General Comments 13.4 and 16.3.

**72.7 COMMENT:** We can never lose sight of the value water has to wilderness; it simply makes no sense to de-water a wilderness area, thereby destroying the natural values--wildlife, fish, and riparian habitat--the wilderness was designated to protect. All avenues must be pursued to assure there will be adequate water to preserve wilderness values within these areas. Since wilderness is nonconsumptive of water, it assures downstream users of a constant supply. The inventory of major surface water supplies within or bordering WSAs (Table 24) should be upgraded. Some of the major water supplies missing from the list are Rock Creek and Flat Creek in Desolation Canyon, Indian Farm Creek in the Deep Creek Mountains, and the Little Dolores in Westwater Canyon. [Utah Wilderness Association]

**72.7 RESPONSE:** Additional information on water resources has been included in the individual analyses and in Tables 37, 38, and 39 of Volume I in the Final EIS.

**72.8 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**72.8 RESPONSE:** See the response to Specific Comment 59.14.

**72.9 COMMENT:** In the section on uranium/vanadium and copper, this WSA needs further investigation of both Salt Wash and Chinle Formation potential. [State of Utah]

**72.9 RESPONSE:** The uranium, vanadium, and copper potential within the WSA have been reviewed. There is no additional evidence that would lead BLM to change the reported potential of these minerals in the Final EIS.

**72.10 COMMENT:** There is no mineral potential in the area, witnessed by the OIR (1), and no significant conflicts otherwise. It seems prudent for BLM to play it safe in this instance and recommend the All Wilderness Alternative. [Utah Wilderness Association]

**72.10 RESPONSE:** The mineral potential is noted in the EIS. Also, reference Appendix 11 in Volume I for BLM's rationale.

**72.11 COMMENT:** Often ignored are the incredible wildlife values. The area has the only resident bald eagle in Utah (a T&E species), as well as an enormous winter population. It is home to the black-footed ferret, the rarest mammal on this continent. The shorebird and migratory bird populations astound even seasoned birders. [Linelle Wagner]

**72.11 RESPONSE:** The Final EIS notes the presence of these species. BLM inventories indicate that suitable black-footed ferret habitat does not exist within the Westwater Canyon WSA. Black-footed ferrets require a prairie dog prey base which will occupy an area covering 250 acres (minimum) or a complex of smaller, isolated prairie dog colonies that will exceed 250 acres within a 4.5 mile radius. These standards were established by the FWS in 1984. However, the FWS suggest that the black-footed ferret may be found in the general area, so this species has been added in the EIS. Peregrine falcons have also been observed in the area.

**72.12 COMMENT:** In regard to Westwater Canyon, your own wildlife people for years have been trying to close off that region so that the riparian habitat could come back. Wilderness would help in this matter. [Craig Rayle]

**72.12 RESPONSE:** The Final EIS describes the importance of the riparian habitat along the perennial waters within the WSA.

**72.13 COMMENT:** As the Draft EIS recognizes, the areas deleted in the Proposed Action border important bighorn sheep habitat. Bighorn sheep depend on solitude and remoteness. Development in the areas deleted could infringe on those values the bighorn

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 72: WESTWATER CANYON WSA (CONTINUED)

need around Big Hole and near Star Canyon. These deletions are also very near Cottonwood Wash, where bald eagles are frequently sighted. Disturbance in this area could displace that species. The Draft EIS does not adequately address the impacts to bighorns and bald eagles if development occurs in these areas. While the river recreation opportunities are protected with BLM's recommendation, sensitive wildlife species could suffer. [Utah Wilderness Association]

**72.13 RESPONSE:** The current bighorn sheep population within the Westwater WSA is very small, possibly nonexistent. There have not been any reported sightings since 1985. Impacts to bighorn sheep would be analyzed prior to surface-disturbing activities. Most of the areas critical to bald eagles are privately-owned land near the WSA boundary. These areas include large stands of cottonwood trees along the Colorado River. Elimination of these cottonwood stands would be very detrimental to the bald eagle. Beavers are currently causing a negative impact to the bald eagle through the removal of mature cottonwood trees. Also, high flow in the Colorado River during 1984 and 1985 washed away many trees. Consequently, any impact to these trees could adversely affect the bald eagle. Any activities authorized by BLM in these areas would be properly analyzed and impacts mitigated.

**72.14 COMMENT:** Westwater Canyon WSA has some of the best quality wilderness values in the region and a low degree of conflict. The recreational values of the Colorado River have long been recognized and provide an economic contribution to the river running industry. Conflicts are minor for all mineral values. There is potential for hydroelectric development on the Colorado River in this WSA. That potential use is in high conflict with the established recreational industry on the river and endangered species habitat. [State of Utah]

**72.14 RESPONSE:** The Final EIS does not analyze the impacts associated with the building of dams on the Colorado River. The Final EIS supports wilderness designation along the Colorado River and it is assumed that this would prohibit dam construction within the WSA.

**72.15 COMMENT:** Why would cultural resources only benefit slightly from All Wilderness? [State of Utah]

**72.15 RESPONSE:** The Draft EIS stated that the All Wilderness Alternative ". . . would provide additional protection . . ." to cultural resources. Also, see the response to General Comment 20.1.

**72.16 COMMENT:** We strongly believe, however, that the complete 31,160-acre WSA should be recommended for wilderness designation. We disagree with BLM's conclusion that this WSA lacks solitude and opportunities for primitive recreation. We feel the WSA area and the few additional lands in the Utah Wilderness Coalition's proposal contain numerous opportunities for outstanding primitive recreation in a very natural setting with high quality solitude. [Sierra Club, Cache Group]

**72.16 RESPONSE:** See the responses to General Comments 3.1 and 22.3.

**72.17 COMMENT:** "Screening" was used to define solitude even though "the WSA is remote, with few significant human intrusions nearby." I also disagree that only 25 percent of the WSA has outstanding opportunities for primitive recreation. Only a few of the possible recreation opportunities were examined. The visual resource is all Class A scenic quality; however, some of this Class A area is improperly placed in Class IV VRM classification. There are no mineral conflicts and "the WSA is unique in that it has a major whitewater river running the length of it." The Utah Wilderness Association Modified All Wilderness proposal gives the WSA a more manageable boundary and it should become the Proposed Action. [Owen Severence]

**72.17 RESPONSE:** The Draft EIS did not correctly identify the scenery classes for the WSA. The correct figures are Class A (25,040 acres), Class B (1,000 acres), and Class C (5,120 acres). The VRM ratings are Class II (25,040 acres), Class III (5,120 acres), and Class IV (1,000 acres). Consequently, all of the Class A scenery has been given a Class II VRM rating. Also, see the responses to General Comments 3.1 and 22.3.

**72.18 COMMENT:** I agree with your statement on Westwater that the vegetative cover and the topographic screening (i.e., the cliffs) do offer a chance for solitude and a good wilderness experience. Indeed, one of the nicest parts of the trip (besides the great rapids) was the chance to lay on the raft, float slowly down the flatwater section, look at the blue sky, and admire the beauty of the massive Wingate Cliffs

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 72: WESTWATER CANYON WSA (CONTINUED)**

looming above the river. Along the river, I thought that once one got below the Miner's Cabin and through Wild Horse rapid, the wilderness experience became total. I very much enjoyed the opportunity to explore some of the side canyons, particularly Little Dolores and Big Hole Canyon. The best and greatest potential for this area is for continued recreational use including river running, canyon hiking, exploring the side canyons (the waterfall up Little Dolores was great), etc. This portion of the Colorado River should be designated as a wild and scenic river. With partial wilderness protection for this area, I am mostly concerned with ORV abuse. ORV users will ignore any closure of an area. For example, I have seen their tracks all over Colorado National Monument, Canyonlands National Park, and in wilderness areas in Colorado's national forests. I would like to see a complete ban on ORV's in Westwater wilderness area. Looking at the map of the proposed wilderness area, I am convinced that river users are going to be able to hear and see ORVs from the river. I also believe that ORVs will disregard signs and travel into the wilderness area. A larger wilderness area will hopefully create a "buffer" between the river and the area where the access roads are located. [Marilynn Peterson]

**72.18 RESPONSE:** Approximately 10 miles of ways will be closed with the Partial Wilderness Alternative. Of the 5,160 acres not designated as wilderness, about 350 acres would have ORV use limited to existing roads and trails. The remaining area would remain open but only receives about 30 visitor days annually. In addition, many remaining roads are miles from the Colorado River and their impacts, if any, would not be noticeable from the river. Consequently, ORV use is not anticipated to be a significant conflict for river users. Furthermore, the acres adjacent to the Colorado River are either limited to existing roads and trails or closed to ORV use under the current BLM land use plan.

**72.19 COMMENT:** BLM claims acreage being deleted has manageability problems due to ranching activities. The specific area is the Picture Gallery Ranch on the southeastern part of the unit. BLM identified the specific ranching activities that would offer "outside sights and sounds" impacting the wilderness values. In the inventor, BLM exaggerated the impacts of two small chainings and largely reclaimed vehicle ways. The middle of the eastern boundary incorrectly follows topographic features instead of significant human impacts, as required by the inventory policy. Deletion of areas from wilderness designation solely on

the basis of outside sights and sounds violates the Wilderness Study Policy. [Utah Wilderness Coalition]

**72.19 RESPONSE:** Boundaries of the Partial Wilderness Alternative were drawn to eliminate potential conflicts. See Appendix 11 in Volume I for BLM's rationale. Also, see the response to General Comment 8.19.

**72.20 COMMENT:** Because of UP&L's responsibility to provide electricity for future growth and development in Utah, the proximity of five WSAs in the BLM Proposed Action alternative to its future steam electric generating stations is of serious concern. No future plants are located in WSAs. Should UP&L's next steam electric plant be one of those listed below, a full EIS would be required as part of the planning process. UP&L is concerned, however, that it would be precluded from building to meet future generation needs in the most efficient and economical manner because of wilderness designation between now and the time the plant is needed. Future steam electric generating plants may be jeopardized if additional air quality restrictions are placed on future wilderness areas. The plant sites and distances from the nearest WSAs are listed below: [Utah Power and Light]

<u>Plant Site</u>	<u>Distance/Direction</u>	<u>Nearest WSA</u>
Mounds	10 miles/east	67
East Canyon	12 miles/southeast	67
Wellington	25 miles/southeast	67
Gordon Creek	32 miles/southeast	67
Woodside	4 miles/southeast	66
Green River	10 miles/southeast	62
Westwater	5 miles/southeast	72

**72.20 RESPONSE:** See the response to Specific Comment 62.43.

**72.21 COMMENT:** Having worked as a Westwater ranger and having enjoyed this WSA in many ways over the last 10 years, I would obviously like to see it included in its entirety in the NWPS, along with as much of the Dolores Triangle and adjacent areas as possible. The recreation values are phenomenal, as the growing, unrequited demand by river users and outfitters attest. The economic value to the towns of Moab and Grand Junction have never been adequately totalled. [Linelle Wagner]

**72.21 RESPONSE:** See the responses to General Comments 21.17, 21.19, and 24.8. Also, see Appendix 11 in Volume I for a summary of BLM's rationale for the Proposed Action. Use is now near the maxi-

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 72: WESTWATER CANYON WSA (CONTINUED)

mum allowed by BLM and will not expand significantly in the foreseeable future.

**72.22 COMMENT:** Each of the many canyons within this area offers opportunities for a multitude of high quality wilderness activities. The WSA has low mineral favorability and few leases or claims. Designation could benefit the local river outfitters. This area is one of the most popular river running areas on the Colorado. It offers a significant economic asset to the local communities. BLM needs to perform an economic analysis of these benefits and include them in the report. BLM made no numerical analysis of the number of jobs and the money involved in the river running operations. BLM did indicate that up to 25 percent of the local economy is dedicated with the tourist industry which is associated to the river and canyon country. [Utah Wilderness Coalition]

**72.22 RESPONSE:** The Final EIS includes the best available information and projections for the Westwater Canyon WSA. The socioeconomic impacts to the local communities of the inherent recreational values have been evaluated.

**72.23 COMMENT:** The boundary on Map 3 for the proposed partial alternative is inconsistent with that shown on the BLM Proposed Action Pocket Map. Which partial boundary is correct? [State of Utah]

**72.23 RESPONSE:** There was a discrepancy between the two maps as noted. Map 3 was correct. The pocket map in the Final EIS has been changed.

**72.24 COMMENT:** The WSA is reported unfavorable for petroleum (Draft EIS p. 15, Volume VI). Our minerals investigation (report in progress) indicates such a conclusion is premature. The Entrada Sandstone, which has yielded petroleum shows in the Bar-X, West Bar-X, San Arroyo, Westwater, and Harley Dome fields and production in the more-distant Ashley Valley field, occurs along the western part of the WSA. Both stratigraphic and structural traps may be present in the Entrada Sandstone in the WSA. If overthrusting has occurred in the region (Draft EIS page 15, Volume VI), strata producing petroleum in the adjacent Paradox Basin may underlie the WSA. There has been no drilling to test these possibilities. Accordingly, we suggest the petroleum potential of the WSA be characterized as "unexplored at depth," rather than "unfavorable." [U.S. Bureau of Mines]

**72.24 RESPONSE:** The Final EIS includes the information provided in the comment.

**72.25 COMMENT:** Oil and gas leasing activity in the WSA appears to be more extensive than the 480 acres reported in the Draft EIS (page 15, Volume VI). Examination of current BLM oil and gas plats for the area indicate that at least 1,000 acres are leased. [U.S. Bureau of Mines]

**72.25 RESPONSE:** There are no oil and gas leases in the Westwater WSA.

**72.26 COMMENT:** Exxon believes each of these areas contain geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which lead us to this recommendation. [Exxon Corporation]

**72.26 RESPONSE:** See the response to Specific Comment 65.5. The proposed Partial Wilderness Alternative would allow for exploration in a portion of the WSA.

## SECTION 73

### WINTER RIDGE WSA

**73.1 COMMENT:** We have determined that Winter Ridge has lost its wilderness characteristics since the original inventory. It is unfortunate that BLM has mismanaged this WSA under the Interim Management Plan and subsequently allowed this area's qualities to be lost forever. This is a good example of how wilderness values can be "forgone" forever. BLM should require, in areas where there is impact from oil and gas activities, restitution from the respective firms that have created the damage. We are especially concerned about IMP violations that have occurred in this area while various appeals were pending at the IBLA. The Final EIS should document all IMP violations found here and develop a plan for restitution.

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 73: WINTER RIDGE WSA (CONTINUED)

This WSA would be a good example for an investigation by Congress regarding how BLM protects wilderness qualities while a unit is under mandated review. [Sierra Club, Cache Group]

**73.1 RESPONSE:** Much of the WSA was, and continues to be, covered with oil and gas leases issued prior to 1976 (i.e., pre-FLPMA). Activities on some of these leases were ongoing at the time the wilderness study began. Originally BLM did not recommend the area for wilderness study, but after appeal, it was included as a WSA, despite the anticipation of continued impacts to wilderness values resulting from the legal exercise of the substantive pre-existing lease rights. Each time BLM received an Application for Permission to Drill (APD) a gas well within the Winter Ridge WSA, an environmental assessment (EA) was prepared to address environmental impacts of approving the APD. This included an impairment or nonimpairment determination for wilderness values. In the case of APDs on pre-FLPMA leases, BLM could legally regulate lease activities to eliminate unnecessary and undue degradation to the environment only to the extent that there was no unreasonable interference with the lessees valid pre-FLPMA rights to explore and recover the oil or gas resource. For each APD, stipulations are included to require reclamation of the site at the completion of the oil and gas operations. All activities within the WSA have been consistent with legal requirements and BLM regulations; and there has been no violation of IMP because the energy companies held prior existing rights.

**73.2 COMMENT:** This area contains 23 oil and gas wells which have been allowed to continue through the review process. Conservationists argue that wells, roads, and pipelines have appeared since 1981 and are therefore illegal intrusions. The story is sad because now not even conservation groups can support the area for wilderness. I can, though, and I do. [M. Cohen]

**73.2 RESPONSE:** The only wells drilled within the WSA were associated with pre-FLPMA leases where companies have prior existing rights. Applications to drill wells on post-FLPMA leases have been denied. Also, see the response to Specific Comment 73.1.

**73.3 COMMENT:** Volume VI neglects to discuss large and important fossil resources in the East Central Region. [State of Utah]

**73.3 RESPONSE:** No large or important fossil resources have been discovered within the Winter Ridge WSA.

**73.4 COMMENT:** Exxon believes each of these areas, including Winter Ridge, contains geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geologic data which led us to this recommendation. [Exxon Corporation]

**73.4 RESPONSE:** BLM concurs that there is a high degree of certainty for energy deposits, as evidenced by the current producing wells. This is reflected in the EIS. Also see the response to General Comment 65.5.

**73.5 COMMENT:** This WSA once provided critical habitat for wild horses, bear, mountain lions, and endangered peregrine falcons. Earlier wilderness designation would have protected these crucial wildlife resources. [Sierra Club, Cache Group]

**73.5 RESPONSE:** BLM did not have authority for wilderness studies prior to 1976. Only Congress can designate wilderness on Federal lands. The Winter Ridge area was found to qualify for intensive inventory and has been managed according to IMP criteria since December 1979. Neither IMP or wilderness designation would eliminate activities with legal entitlements under prior existing rights. Adequate forage is available for wild horses, although the BLM Book Cliffs RMP provides for removal of the few remaining horses because the small number is not biologically viable. Habitat still exists for bear, mountain lions (cougar), and other wildlife, and disturbed sites will eventually be reclaimed.

**73.6 COMMENT:** The discussion of the No Action Alternative describes no specific potential impacts on any nongame wildlife. [Scott Mills]

## SPECIFIC COMMENTS AND RESPONSES

### SECTION 73: WINTER RIDGE WSA (CONTINUED)

**73.6 RESPONSE:** For the Winter Ridge WSA, wildlife is not considered a significant issue and no major impacts to wildlife are expected to occur, considering the various land uses (including protective and rehabilitation measures) authorized in the Book Cliffs RMP.

**73.7 COMMENT:** Winter Ridge WSA has the lowest wilderness quality values and the highest degree of conflicts of all the WSAs in this region. The major conflicts are with mineral and energy resources and other land uses. [State of Utah]

**73.7 RESPONSE:** Although there may be conflicts between wilderness and energy development, BLM believes that the mineral potential (including pre-FLPMA oil and gas leases) outweighs the wilderness values in this WSA.

**73.8 COMMENT:** The Draft EIS inadequately addresses hydroelectric development potential in the WSAs included in the alternatives. A study entitled Resource Survey of Hydroelectric Power Potential in Utah and Southeast Idaho, by Calvin G. Clyde, Eugene K. Israelsen, and Win-Kai Lin, prepared by the Utah Water Research Laboratory, identified potential hydroelectric sites in or adjacent to WSAs 19, 24, 25, 29, 31, 38, 41, 63, 64, 66, and 73. UP&L has not investigated each site and independently determined its hydroelectric development potential, but Dr. Clyde did appear as an expert witness for a Utah State agency before the Utah Public Service Commission in the Cogeneration Hearings in 1985. UP&L strongly recommends that the Final EIS review Dr. Clyde's study in relationship to hydroelectric potential in the proposed wilderness areas. [Utah Power and Light]

**73.8 RESPONSE:** See the response to General Comment 14.27.

### SECTION I DANIELS CANYON WSA

**I.1 COMMENT:** In the Vernal District, using rationale in conflict with the Wilderness Review Policy, BLM eliminated all lands from further review except this one. The eliminated areas include many units abutting the Dinosaur National Monument Wilderness Proposal and are equal in value. BLM eliminated outstanding wildlife habitat and hunting areas in the Brown's Park and Diamond Mountain area. Major canyon country in the Uinta Basin was deleted, Winter Ridge WSA

for example, to allow oil exploration without interim management protection of wilderness values. [Utah Wilderness Coalition]

**I.1 RESPONSE:** BLM supports the original inventory and the decisions based on the inventory. For more detailed discussion of the inventory process, refer to the response to General Comment 3.1. For a discussion of oil exploration in the Winter Ridge WSA, see the response to Specific Comment 73.1.

**I.2 COMMENT:** BLM's inventory was in error. [Utah Wilderness Coalition]

a. In the initial inventory, Daniels Canyon contained 5,920 acres. BLM dropped 3,445 acres from wilderness study. They argued that the canyon is open and that the imprints of man impinge the periphery of the unit. Field work by the Utah Chapter Sierra Club has proved that BLM misrepresented the area. Slick-rock canyons were cut, leaving portions in and out of the WSA. Striking badland cliffs were bisected with equal portions in and out of the area. Wilderness values clearly didn't decide this boundary. The boundary information lies in mining claims. Only one mining operator holds claims in this area and the claim boundaries match exactly the area deleted from the inventory. The intrusions described were small and largely reclaimed in the dense pinyon juniper forest found in the southern part of the unit. BLM incorrectly failed to draw the boundary of the WSA to the edge of significant man-made impacts. The deletions made in the intensive inventory violated the inventory policy. These deletions subsequently led to a small WSA. It is the small size of the remaining area that forms the core argument supporting BLM's recommendation of no wilderness (not suitable for designation). The one consistency in the BLM wilderness review is deletions on wilderness areas in conflict with policy. Based upon the record of this area in the inventory, it should not be surprising that the recommendation of no wilderness is in conflict with the Wilderness Study Policy.

b. With this new information on the inventory, BLM now is required to review and make changes to correct the problems. BLM can only recommend wilderness in this area. BLM has no logical argument against wilderness. This is one of the better examples of how BLM exhausted a logical process in developing wilderness recommendations and still wanted to drop more areas. BLM's recommendations are blatantly



## SPECIFIC COMMENTS AND RESPONSES

### SECTION 73: WINTER RIDGE WSA (CONTINUED)

arbitrary and in conflict with the wilderness review process.

**I.2 RESPONSE:** See the response to General Comment 3.1 and Appendix 11 in Volume I.

**I.3 COMMENT:** There was at one point another area that was being considered, called Moonshine Draw, which extended north of Daniels Canyon and sort of filled in that corner there by the monument. Daniels Canyon by itself is a pretty stupid idea, but Daniels Canyon and Moonshine Draw, that would make a worthwhile unit. It's easy to get to. You don't have to drive for 4 hours over rough dirt roads to pull into the place. [Day Delahunt]

**I.3 RESPONSE:** Moonshine Draw was not designated as a WSA because it did not meet the criteria established for a WSA. Also, it is separated from Daniels Canyon by a road and does not logically tie recreation values between Dinosaur National Monument and Daniels Canyon WSA.

**I.4 COMMENT:** BLM's rationale for the Proposed Action is erroneous. [Utah Wilderness Coalition]

a. By violating inventory policy, BLM created a small WSA. If the complete interagency (NPS and BLM) wilderness recommendation is considered, then a much larger wilderness recommendation (totaling more than 167,000 acres) is present. BLM cannot use small size as an argument to drop this area from recommendation.

b. Earlier in the wilderness study BLM stated, "Wilderness values cannot be preserved and the area is not capable of being managed as wilderness." BLM no longer uses this argument. They have given up providing reasons supporting their decisions. There is no rationale given for this recommendation. In view of the absence of conflicts and high wilderness quality, designation is the only logical conclusion. BLM cannot support their recommendation.

**I.4 RESPONSE:** Rational for the BLM Proposed Action is in Appendix 11 in Volume I of the Final EIS.

**I.5 COMMENT:** BLM says that key terrain features are on State land and private land must be crossed to enter Daniels Canyon from the east. This argument is not a valid reason to drop a wilderness area in a manner supported by the study policy. The State has a policy of exchanging State in-holdings in lands recom-

mended for wilderness. The Project BOLD proposal indicates that the State will be offering these State lands to BLM for exchange. [Utah Wilderness Coalition]

**I.5 RESPONSE:** Key terrain features on State land and private ownership of land on the east side of the WSA affect accessibility. State lands are not proposed for exchange. For more discussion of the relationship of wilderness designation and State and private lands, see Chapter 1 in Volume I. Also, see the response to General Comment 6.3.

**I.6 COMMENT:** It's access is mostly by crossing private property, and a wilderness designation would create problems with the maintenance of the Dinosaur National Monument fences and the preservation of the developed watering places. [Scott Chew]

**I.6 RESPONSE:** Access to the WSA from the east crosses private property and conflicts between the owner and users of the WSA could arise. Existing range improvements (fences and water developments) could be used and maintained as in the past based on practical necessity and reasonableness.

**I.7 COMMENT:** BLM is wrong, there is water in Daniels Canyon. [Dean Chew and Scott Chew]

a. For Daniels Canyon, the Draft EIS says there is no water in Daniels Canyon owned by individuals. I have with me two water titles which cover all the water in Daniels Canyon and give me a right to do anything necessary to make sure the water reaches the ranch for irrigation. Had they checked the water out and followed it down Cub Creek they would have found that it is mostly used for irrigation. Not for livestock and wildlife as stated.

b. The irrigation water that my family uses to irrigate the farmland on our ranch, which was originally the Daniels Ranch, for which the Daniels Canyon was named, originates in this area, and according to a court degree dated April 6, 1916, states the water right was established prior to 1888. On April 8, 1953, this water right was questioned again by application number 24-77-2, and was shown to be sound and the right was duly credited to the predecessor in interest of the protestant in this case of E.D. Daniels V. M.M. Morris, Civil No. 754. This case also points out, "that the plaintiff is the owner of a right-of-way leading along the course of the said Cub Creek or Daniels Creek, and all of its tributaries, and leading

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 73: WINTER RIDGE WSA (CONTINUED)**

to the feeding springs thereof, sufficient in width for the purpose of cleaning the channels thereof." This civil case came from book 1 of the water certificate, page 276 to 270, in the Uintah County Courthouse.

**I.7 RESPONSE:** The existence of the water right is noted and the EIS has been changed to more accurately describe the situation.

**I.8 COMMENT:** BLM found no mineral or energy resource values in this area posing a conflict. This area was not one of the areas assessed by the DOE for development conflicts. The DOE indicated that a study of this area was not requested since BLM was not going to recommend this area for wilderness designation. [Utah Wilderness Coalition]

**I.8 RESPONSE:** BLM, in cooperation with the DOE, assessed the WSA for energy and mineral resources. Geologic environments studied within the WSA are generally unfavorable for occurrence of mineral resources. Refer also to Appendix 5 in Volume I of the Final EIS for a description of the mineral and energy rating system.

**I.9 COMMENT:** In the text on locatable minerals, what is carbonaceous trash.[Utah Wilderness Coalition]

**I.9 RESPONSE:** "Carbonaceous trash" has been replaced in this EIS with "carbonaceous material." The term "carbonaceous material" refers to an accumulation of organic matter, mostly fragments of carbonized vegetation, in a sedimentary sequence.

**I.10 COMMENT:** Threatened and endangered (T&E) species are summararily dismissed. The Draft EIS (Volume I) notes no terrestrial T&E species are found in WSAs and the only nonaquatic T&E animals are migrant bald eagles and peregrine falcons. It fails to note bald eagles are not mere migrants to Westwater Canyon WSA (they are permanent residents). Only the North Horseshoe Canyon WSA is listed in Volume I as home to resident peregrine falcons. Why weren't other areas listed? Likewise the findings on terrestrial T&E species are flawed. The FWS letter (Draft EIS, Appendix 4) indicates the black-footed ferret may inhabit several WSAs (Dirty Devil, Horseshoe Canyon North and South, Behind the Rocks, Desolation Canyon, Floy Canyon, Spruce Canyon, Flume Canyon, Westwater Canyon, Lost Spring Canyon, and Daniels Canyon). [Utah Wilderness Association]

**I.10 RESPONSE:** The Final EIS states that peregrine falcon and bald eagle may pass through the Daniels Canyon WSA during spring and fall migration and that FWS has identified the WSA as potential habitat for black-footed ferret. Other special status species are also mentioned.

**I.11 COMMENT:** Wilderness designation is necessary to protect the riparian habitat and associated animals in the WSA. [Utah Wilderness Coalition and Eric Johnson]

a. A perennial stream and active beaver population must be protected. This is a natural addition to the national monument it is next to. No conflicts prevent wilderness designation.

b. A perennial stream offers riparian habitat critical to game using BLM lands.

**I.11 RESPONSE:** BLM agrees that it is important to protect perennial streams and active beaver populations; however, this does not necessarily require wilderness designation.

**I.12 COMMENT:** BLM says that the area would not significantly add to Dinosaur National Monument's wilderness proposal. In view of the absence of the required inventory of wilderness values in this area, the BLM argument goes without support. BLM failed to indicate that comprehensive inventories of archaeological sites, rare and endangered species, special geological features, and wildlife have not been performed. [Utah Wilderness Coalition]

**I.12 RESPONSE:** Data inventories have been completed for several renewable and nonrenewable resources in the WSA. This information is reflected in the EIS. Additional inventories are not required, as explained in the responses to General Comments 9.6, 13.1, 16.3, and 20.2.

**I.13 COMMENT:** The discussion of the No Action Alternative describes no specific potential impacts on any nongame wildlife. [Scott Mills]

**I.13 RESPONSE:** See the response to General Comment 16.4.

**I.14 COMMENT:** The study does not show it is a critical winter range for deer, and it is a critical winter range for deer. [Dean Chew]

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 73: WINTER RIDGE WSA (CONTINUED)**

**I.14 RESPONSE:** The area is not classified as critical winter range by the UDWR.

**I.15 COMMENT:** Important wildlife habitat is present for mountain lions. Wilderness designation will best protect this habitat resource. [Sierra Club, Cache Group]

**I.15 RESPONSE:** The WSA does contain mountain lion (cougar) habitat and this is mentioned in the EIS.

**I.16 COMMENT:** In the past few years we have had a problem with Mormon crickets, and we need to be able to use aircraft in this area for pest control. We also need to use aircraft for predator control. This WSA has a number of manmade blemishes, one of which is the Dinosaur National Monument boundary fence, and a number of old bulldozer tracks that natural erosion and vegetation will never hide. [Scott Chew]

**I.16 RESPONSE:** If the WSA were a designated wilderness area, measures to control insects, such as Mormon crickets, could be taken in instances that significantly threaten human life, property, or high-value resources on adjacent nonwilderness lands, or where unacceptable changes to wilderness values would result if measures were not taken. Measures taken must be those having the least adverse impact to wilderness values. The use of aircraft above wilderness areas would not be prohibited, but low-level flights would be discouraged except in emergency situations. BLM has determined that the bulldozer tracks could be restored to a substantially unnoticeable condition. The Dinosaur National Monument boundary fence would remain and continue to be maintained or, if not needed, removed with the permission of the NPS.

**I.17 COMMENT:** Wilderness designation would limit the use of the land. There is a number of cedar posts growing in this area and wilderness would cease the possibility of utilizing this renewable resource. [Scott Chew]

**I.17 RESPONSE:** If the Daniels Canyon WSA was to be designated wilderness, the cedar posts within the area could not be harvested. Since pinyon-juniper harvest is widely available elsewhere in nondesignated areas, the lack of harvest in the Daniels Canyon WSA is not considered to be significant.

**I.18 COMMENT:** This area contains badland cliffs and entrenched canyons that are a scenic foreground

to Dinosaur National Monument. [Utah Wilderness Coalition]

**I.18 RESPONSE:** Some of the badland cliffs and entrenched canyons in the Daniels Canyon area are a scenic foreground to Dinosaur National Monument. It is anticipated that this would not change, regardless of wilderness designation or nondesignation.

**I.19 COMMENT:** This area contains several important archaeological sites that wilderness designation will best preserve. Protection of these scientific and cultural artifacts are a legitimate and important reason for wilderness designation. [Sierra Club, Cache Group]

**I.19 RESPONSE:** BLM agrees that it is important to protect archaeological values. There are laws intended to accomplish this regardless of wilderness status. Also, see the responses to Specific Comment 39.24 and General Comment 20.1.

**I.20 COMMENT:** BLM's assessment of wilderness values is in error. [Sierra Club, Cache Group, and Rudy Lukez]

a. We disagree with BLM's conclusion that this WSA lacks solitude and opportunities for primitive recreation. We feel this WSA area and the few additional adjacent lands in the Utah Wilderness Coalition's proposal contain numerous opportunities for outstanding primitive recreation in a very natural setting with high quality solitude. To verify this, we organized a trip to the area over Memorial Day weekend, 1986, and found that this area meets the requirements for solitude, outdoor recreation, and naturalness. Our participating members found a true wilderness experience here.

b. I completely disagree with BLM's conclusion that this WSA lacks solitude and opportunities for primitive recreation. I found that this WSA area and the few additional adjacent lands in the Utah Wilderness Coalition's proposal contain numerous opportunities for outstanding primitive recreation in a very natural setting with high quality solitude. Impacts from earlier roads are nearly invisible today. Most of the jeep roads identified on the USGS topographical maps are essentially nonexistent. This was evident during my travel through the WSA.

**I.20 RESPONSE:** The determination of outstanding solitude and opportunities for primitive recreation

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 73: WINTER RIDGE WSA (CONTINUED)**

was done based on interpretation of standard criteria, including field evaluation. Also, see the responses to Specific Comment 26.52 and General Comment 3.1.

**1.21 COMMENT:** BLM has incorrectly assessed the condition and impacts of travel routes in the WSA. [Sierra Club, Cache Group, and Dean Chew]

a. Impacts from earlier roads are nearly invisible today. Most of the jeep roads identified on the USGS topographical maps are essentially nonexistent.

b. Daniels Canyon has various bulldozer roads and early uranium assessment work. These roads are clearly visible now, even though they have not been maintained in several years. How can you make wilderness out of something that natural erosion and vegetation won't cover or camouflage in years to come. These roads are used by hunters and picnickers and would cost a lot to keep people off from them.

**1.21 RESPONSE:** During the inventory process, the uranium prospect trails were carefully evaluated and judged to be "ways." These "ways" have not been maintained for several years, and can be restored to a substantially unnoticeable condition.

**1.22 COMMENT:** I disagree that the opportunities for primitive recreation are less than outstanding because "the confining nature of the landscape makes the area best suited for day use and, therefore, does not provide a wilderness experience." Day hiking is a legitimate use of wilderness. (The Draft EIS never ceases to amaze me. I thought I had seen every possible excuse to drop areas from the wilderness proposal, but here is a new one - will wonders never cease.) The WSA deserves to be proposed as All Wilderness because it is adjacent to a proposed wilderness area in Dinosaur National Monument. [Owen Severence]

**1.22 RESPONSE:** See response to Specific Comment 1.20.

**1.23 COMMENT:** Certainly, since BLM is dropping all other areas from wilderness recommendations in this district, this area would add geographic diversity of BLM wilderness lands if designated. If BLM had applied fairly the wilderness study criteria, then this area would qualify for wilderness designation. [Utah Wilderness Coalition]

**1.23 RESPONSE:** Designation of Daniels Canyon as wilderness would add geographic diversity to public

lands, but the WSA is very similar to areas currently identified for wilderness review within Dinosaur National Monument. Additionally, the WSA has ecological characteristics similar to a number of other areas under study by BLM.

**1.24 COMMENT:** The Daniels Canyon WSA should be designated wilderness and/or transferred to the NPS. [Rudy Lukez, John Winkel, and State of Utah]

a. Since this WSA is contiguous to Dinosaur National Monument's backcountry and potential NPS wilderness, BLM should establish wilderness here as a logical and natural extension. This needs to be fully explored in any analysis.

b. Daniels Canyon has been inexplicably reduced in size from the proposed April 1980 WSA and not recommended for wilderness by BLM. This makes no sense since the area is similar and adjacent to proposed wilderness inside Dinosaur National Monument. The entire area should be inside Dinosaur National Monument. The entire area should be designated. I would prefer to see the area expanded rather than allow for a road short-cutting from the monument.

c. Daniels Canyon WSA has both low wilderness-quality values and conflicts compared with the other WSAs in the region. There are few mineral or energy resource conflicts, but a potential conflict exists with the development of a private water right. Given the WSA's adjacency to Dinosaur National Monument, additional study should be made of transferring the unit from the Bureau of Land Management to the NPS.

d. As mentioned for Lost Spring Canyon WSA, the Daniels Canyon WSA was also identified for further study in the Secretary's letter to the House Committee. The EIS constitutes that study. BLM's preferred alternative is no action; i.e., do not designate as wilderness. The NPS continues to believe that the area has wilderness characteristics and that the landforms therein are a continuation of those landforms found in Dinosaur National Monument. If no action is chosen, however, the NPS would prefer to see BLM manage that area in a manner that is compatible with NPS management of adjacent lands.

**1.24 RESPONSE:** Daniels Canyon WSA is contiguous to the Dinosaur National Monument boundary for about 2.5 miles, but accessibility between the monument and the WSA is severely restricted by Cub Creek Canyon. This limits the value of the WSA as a logical

**SPECIFIC COMMENTS AND RESPONSES**  
**SECTION 73: WINTER RIDGE WSA (CONTINUED)**

extension of the monument that can be used by visitors to the WSA.

The size of the WSA was determined to be 2,496 acres to eliminate the imprints of man and block the unit. The statement that the entire area should be included in Dinosaur National Monument deals with an administrative matter, not a land use allocation issue; and therefore has no bearing on the wilderness study. Also, see the response to General Comment 3.24.

**I.25 COMMENT:** BLM indicates that any development on State-owned tracts of land would immediately have negative effect on naturalness. BLM identifies no conflicts which offer any incentive for development. This hypothetical argument is not supported by any objective data and offers no serious reason supporting the BLM recommendation. [Utah Wilderness Coalition]

**I.25 RESPONSE:** The possibility of development on in-held or adjacent State lands has been addressed. The analysis assumptions used for affected State lands are the same as those used for the surrounding Federal lands. In those WSAs where development is projected (see Appendix 6), conflicts with wilderness values could be affected on both State and Federal lands. For the Daniels Canyon WSA, no future development is projected in the Final EIS for either State or Federal lands.

**I.26 COMMENT:** Exxon believes each of these areas contain geologic formations which are favorable for generating and trapping oil and gas. BLM also recognized the significant oil and gas potential of many of these WSAs because seven of the ten areas were identified as having either moderate or high oil and gas potential. However, access is needed to conduct further geological and geophysical work, and perhaps exploratory drilling to determine if such deposits do exist and whether they are recoverable. Obviously, this possibility cannot be tested if access to these areas is denied. Thus, we strongly urge BLM to recommend all of these areas as not suitable for wilderness to allow the energy potential of each one to be thoroughly evaluated. We will be happy to discuss with BLM representatives at a later date the specific geological data which lead us to this recommendation. [Exxon Corporation]

**I.26 RESPONSE:** See the response to General Comment 15.1 Certain types of access are currently

available to evaluate these areas during the study phase. Geophysical work is allowed, as is drilling, if it can be done in a nonimpairing manner on post-FLPMA leases. Such restrictions do not apply on pre-FLPMA leases. The remainder of the comment is noted. It should also be noted that the proposed No Action/No Wilderness Alternative will allow for future exploration activities. Appendix 11 in Volume I provides a summary of the rationale for BLM's Proposed Action.





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