Scoping the...
utah statewide

WILDERNESS

environmental impact statement.

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
UTAH STATE OFFICE
136 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111

PUBLIC SCOPING ISSUES

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IN REPLY REFER TO

1792
(U-933)

July 20, 1984

Dear Reader:

This booklet provides information concerning issues, diversity and alternatives obtained during the scoping process conducted from January 1984 to the present pertaining to the Bureau of Land Management's (BLM) Utah Statewide Wilderness Environmental Impact Statement (EIS).

We appreciate the comments and the information which were received by mail and during the various scoping meetings sponsored by BLM in January, February, and March. That material is now on file as part of the wilderness study process and is summarized in the booklet. We thank all the agencies, organizations and individuals who participated in the EIS scoping effort.

The wilderness scoping material will be used by the BLM in the preparation of the Draft EIS. Because of the wide variety of comments and suggestions, BLM will need to further study and condense the information in portraying significant issues and reasonable alternatives in the EIS. The EIS will explain how this is done and will briefly discuss any scoping material considered but not used in the EIS alternatives and/or impact analysis.

We now intend to concentrate on the writing of the BLM Utah Statewide Wilderness EIS and expect to have the draft document (in 5 or 6 volumes) available for public review and comment in May 1985.

If, after reading the enclosed EIS scoping summary booklet, you have additional comments which may help in the EIS preparation, you are invited to send them to us.

Sincerely,

Roland G. Robison
State Director

Enclosure
As Stated

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Scoping the Wilderness Study Area

The Bureau of Land Management (BLM) is responsible for the management of public lands. The BLM is also responsible for the management of the National Wilderness System. The BLM is currently reviewing the National Wilderness System and is seeking input from the public. The BLM is currently reviewing the National Wilderness System and is seeking input from the public.

As part of the review, the BLM is conducting a series of public hearings. The BLM is currently reviewing the National Wilderness System and is seeking input from the public. The BLM is currently reviewing the National Wilderness System and is seeking input from the public.

During January 1984, the BLM conducted a series of public hearings. The BLM is currently reviewing the National Wilderness System and is seeking input from the public. The BLM is currently reviewing the National Wilderness System and is seeking input from the public.

In the past, the BLM has conducted a series of public hearings. The BLM is currently reviewing the National Wilderness System and is seeking input from the public. The BLM is currently reviewing the National Wilderness System and is seeking input from the public.

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and list of comments
has been prepared
"Summary of Comments"
enclosed.

to encourage the
BIA, Washington
institute
at this time
and at the same time

transmit a letter
to the BIA

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INTRODUCTION

This booklet summarizes all comments received during the latest scoping effort for the Bureau of Land Management's (BLM) Utah Statewide Wilderness Draft Environmental Impact Statement (EIS). The information received is appreciated and will aid BLM in improving Site-Specific Analyses (SSAs) and in formulating issues and alternatives to be addressed in the EIS. Scoping is an ongoing process and will continue through completion of the EIS.

Scoping—Its Purpose and Background

The purpose of scoping is to gather views and comments to help BLM identify significant issues and examine reasonable alternatives related to a proposed action. Interested land user groups, organizations, individuals, and governmental agencies, including BLM specialists, are consulted during this process. Scoping for the Utah Statewide Wilderness EIS began as early as 1978 with the wilderness inventory.

As part of the scoping process, comments were requested in July 1982 on SSAs prepared for each Wilderness Study Area (WSA) in Utah. These site-specific comments were received, evaluated, and used to revise the SSAs at that time. The results of these comments are found in the revised SSAs, which will be available for further review and comment when the Draft EIS is published. (All SSAs will be published as Part II of the Draft EIS.) Many of the previously submitted SSA comments were received again in the latest scoping effort and are included in this booklet.

During January-April 1984, comments were requested regarding (1) issues and concerns; (2) diversity; and (3) alternatives for the EIS. At that time, public scoping meetings were conducted in Vernal, Logan, Tooele, Price, Moab, Monticello, St. George, Kanab, Escalante, Loa, Delta, and Salt Lake City, Utah. In addition, meetings were held with the State government and several different land user groups (e.g., agricultural, environmental), and brochures requesting written comments were mailed to over 1,500 individuals, organizations, and governmental agencies.

In this latest scoping effort, BLM received 147 comment letters from local, State, and Federal government agencies, land user groups, and individuals. These letters contained about 1,200 comments. The land user group meetings and public scoping meetings resulted in about 600 additional comments. All comments recorded at meetings and all letters will be kept as part of BLM's permanent scoping record.

The Booklet

As stated previously, this booklet summarizes all comments received during BLM's latest scoping effort. It should be noted that no attempt to analyze or evaluate these comments has been made by BLM in this booklet. Comments have been consolidated into the three sections described below:

Issues and Concerns: This section is divided into two major headings: (1) General Issues and Concerns; and (2) Specific WSA Issues and Concerns. The general section lists comments received by resource (e.g., air quality, minerals, economics, etc.) and by other subjects (i.e., manageability, EIS and SSA analyses, etc.). The WSA specific section lists comments by WSA. All comments received will be used to help determine subjects requiring analysis in the EIS. Comments directed toward specific WSAs will be used in the scoping and analysis sections for those SSAs.

Diversity: Comments received will aid BLM in determining how diversity criteria should be applied and just how much weight diversity should receive in the EIS.

Alternative Development: This section is divided into three major headings: (1) Alternative Development—Emphasis on Wilderness Values; (2) Alternative

Development—Emphasis on Commodity Values; and (3) Alternative Development—Other. Each of these sections is further divided into criteria and examples of WSAs meeting given criteria. These data will be used in development of alternatives for the EIS.

The booklet specifies whether a comment was received from public scoping meetings, land user group meetings, governmental agencies, or individuals. An abbreviation for each of these groups appears in parentheses after each comment, as shown below:

- (1) public scoping meeting (psm);
- (2) land user group meeting (lug);
- (3) governmental agencies (ga); or
- (4) individuals (ind)

If the same comment is made by more than one of these groups, the abbreviation for each group will be listed.

As you read through this booklet, you will notice that some comments are repeated. This redundancy will be eliminated in the EIS; however, for reporting purposes, it is important to acknowledge how a particular interest group developed and stated their comments.

Salt Lake City Scoping Meeting

GENERAL ISSUES AND CONCERNS

GENERAL ISSUES AND CONCERNS

Air Quality

- How would wilderness affect air quality standards? (psm, ind)
- Would wilderness areas be designated Class I? (psm)
- Would higher air quality standards be imposed following wilderness designation? (psm, ind)

Soil

Erosion

- WSAs with high erosion hazard and/or areas that could receive erosion control measures should not be designated wilderness. (psm)
- A complete assessment of erosion control potentials in WSAs should be made. (ga)
- Wilderness would exclude off-road vehicles (ORVs), a major contributor to erosion. (ind)
- Soil is basic to maintain man's quality of life. (ind)

Soil Rehabilitation/Reclamation

- BLM has been negligent in enforcing non-impairment criteria and rehabilitation; therefore, wilderness is a sound way to regulate natural areas. (psm)
- Analysis should consider reclamation of disturbed areas and ways. (psm)
- Rehabilitation of disturbed areas should be logical, and disturbed areas should not be disturbed soon after. (psm)
- Could reclaimed mineral lands be designated wilderness? (psm)
- Is development allowed during interim management based on overly optimistic expectations of rehabilitation? (psm)
- Wilderness designation could preclude flood control measures and present flood hazards to private lands and water systems (i.e., the town of Ivins, Beaver Dam Wash, and Washington County canyons). (psm)
- Flood control development could be needed in some WSAs. Would these structures or improvements be permitted and preserved? (psm)

Vegetation

General

- Protection of fragile desert plateau and mountain plant communities, ecosystems, and endangered species through wilderness designation should be a consideration. (ind)
- The protection of unique and diverse ecosystems is an issue. (ind)
- Preservation of riparian areas must be given optimum weight. (ind)
- Protection of plant species' diversity through wilderness designation would serve in the future to indicate the effects of man on the biosphere. (ind)
- The presence of bristlecone pine in a WSA is important. The mere presence of these trees gives much information on the biogeographical distribution of the species. Since bristlecone pine can live for many years, even a young forest has great implications 1,000 years from now. (lug)
- Riparian areas have historically been utilized heavily by livestock and have been degraded and, therefore, have become less available and productive as wildlife habitat. This should be an issue of wilderness designation and management. (lug)
- Large WSAs or complexes of WSAs would tend to preserve large ecosystems. This would tend to preserve large ecosystems and enhance wilderness values. (psm)
- WSAs are not natural; for example, tamarix is an introduced species. (psm)

Management

- Could fire be used to enhance vegetation diversity and naturalness? (psm)
- It should be determined if noxious weeds are present in each WSA. How would noxious weeds be controlled in designated wilderness? (psm, ga)
- There is concern, especially where private property adjoins designated wilderness, that such areas could act as uncontrolled sources for noxious weeds. (psm)

Classification

- The Bailey-Kuchler ecosystem classification system has too much resolution, its classification is too broad, and it is not site-specific. (psm, lug, ind)

- An attempt should be made to catalog vegetation types that are not found on Bailey-Kuchler's map or which are unusual for the WSA, the region, or the country. (lug)
- The Bailey-Kuchler method tends to lump all the desert areas together as "pinyon-juniper." A system with finer gradations should be used. (ind)
- Is SVIM data available for the WSAs? (lug)

Threatened and Endangered Species

- Listed, candidate, and other sensitive plant species' habitat could be protected through wilderness designation. (lug)
- Wilderness designation could aid in the recovery of threatened and endangered listed species, with the eventual goal of delisting and preventing the need to list certain candidate, or other sensitive plant species again. (lug)

Water Resources

General

- Water uses should be compatible with other environmental acts (e.g., Clean Air, Noise). (psm)

Water Developments

- Would vehicular access be allowed for maintenance of existing water developments? (psm)
- What would happen to roads/ways and water systems in areas designated as wilderness? (psm)
- What rights (including maintenance) would existing developments have in designated areas? (psm)
- Could new water sources be developed for such uses as agriculture, culinary, mineral, and community in wilderness areas? (psm)
- How would designation affect present and potential water use, improvements, water rights, and downstream ponds? (psm)
- Wilderness should not be designated where it could preclude water developments and impede development in local communities (i.e., reservoirs). (psm)
- Development of water by means of wells, springs boxes, and impoundments, including maintenance, should occur. Water is a valuable natural resource in the arid western states. (ind)

- Upstream water development or river regulation would not be affected by wilderness designation of downstream areas. (ga)

Water Rights

- What would happen to water rights if an area were designated wilderness? What about water already allocated? (psm)
- Would the State of Utah retain control of water rights and allocation? (psm)
- People with water rights in wilderness areas should be allowed to utilize those rights, including development, if necessary. (lug)
- Conflicts with water rights should be considered. (ga)

Watershed

- Watershed values should be given the same importance as resources with monetary value. (psm)
- What would the effect of designation be on maintaining watersheds and water flows? Watersheds are important to Utah, other states, and Mexico. (psm, lug)
- Attracting additional people would adversely impact watersheds. (psm)
- Would special stipulations or restrictions (e.g., watershed stipulations for Lone Peak) be added to the recommendations made to Congress? (psm)
- The State of Utah has a nondegradation policy on watershed areas which complements wilderness. (psm)
- Wilderness designation would protect the watershed. (ind)
- Watershed management is an issue because of health, land use, and economics. (ind)

Water Quality

- How would wilderness designation impact water quality and salt in the Colorado River? (psm)
- Cumulative impacts on the Colorado River system should be identified. (ga)
- A complete assessment of salinity potential in WSAs should be made. (ga)
- Water quality is basic to maintain man's quality of life. (ind)

Mineral and Energy Resources

General

- Wilderness values should outweigh mineral values in the designation process. (ind)
- WSA acreage has already been reduced due to mineral conflicts. (psm)
- Energy and commercial development quickly and permanently turn these developed areas into lifeless and ultimately worthless land. (ind)
- WSA boundaries seem to have been determined on the basis of mineral leases. (ind)
- Any wilderness designation should take into account and allow for coal development and transportation corridors (e.g., the Cockscomb and the Kaiparowits coal field). (lug)
- Coal unsuitability criteria need to be applied to WSAs to first determine what areas are suitable for coal mining. (ga)

Management

- The Interim Management Policy (IMP) inhibits exploration and development in areas which may not be designated wilderness. (psm)
- How would existing developments and pre-FLPMA (Federal Land Policy and Management Act) rights affect wilderness or the designation thereof? (psm)
- There should be a time frame established at which designation of a particular WSA should be reevaluated. (psm)
- Wilderness areas should be open to carefully regulated mineral exploration. (psm)
- Would surface occupancy leases be issued in wilderness areas? (psm)
- Could reclaimed mineral areas be designated wilderness? (psm)
- Wilderness is multiple use and is needed to protect some areas from uncontrolled mineral development. (psm)
- Mineral energy development should not be stopped by wilderness designation nor should other uses (i.e., pipeline or power corridors). (psm)
- Mitigation is a two-way street. If oil and gas, etc., must be mitigated, the same concern should be applied to the strict definition of wilderness and its required management (i.e., mitigate wilderness designation). (psm)

- Would wilderness designation result in mineral deposits being inaccessible? (ga)
- How would valid existing rights be affected by wilderness designation? (ga)

Development Potential

- How would mineral potential affect the designation of wilderness areas or other evaluations? (psm)
- How would wilderness designation affect mineral exploration and development in WSAs? (psm, ga, ind)
- Wilderness areas with a moderate to high potential for mineral development should remain open to exploration and development. (lug, ind)
- The presence of minerals and/or energy potentials should not automatically preclude an area from wilderness designation. (lug)
- Mineral resource potential should not be considered in the designation process. (ind)
- Mineral potential should take into account such aspects as quantity and quality of the mineral resource and the likelihood of development. (ind)
- Uranium and coal potentials should not be a factor in determining the mineral potentials of WSAs. (ind)

GENERAL ISSUES AND CONCERNS

Evaluation

- There should be consistency in evaluations of wilderness and mineral values for all WSAs. (psm)
- What is the mineral resource potential for each WSA and how is it assessed? Is the stated potential realistic? Does the potential take into account such factors as present producibility? (psm)
- There should be consistency in evaluating pre- and post-FLPMA disturbances in all WSAs. (lug)
- The Science Applications, Inc., reports imply a low mineral resource potential for those areas with low certainty levels. This may not be the case and may be a fatal error. An adequate mineral resource evaluation needs to be conducted. (lug, ga)

Economics

- Future demands or improvement in technology may make presently low grade or otherwise unobtainable mineral deposits needed or economic to develop in the future. (psm, lug, ind)
- Wilderness designation would preclude the development of mineral resources and detrimentally impact the economy of the State of Utah while increasing our dependence on foreign sources. (lug)
- The study of impacts resulting from wilderness designation should include the economic impact to the government from purchasing existing claims and leases within designated wilderness. (lug)
- Economic analysis should be formulated for those WSAs containing coal resources. (ga)
- Are the mineral resources economically and technically feasible to extract (i.e., quantity, quality, and market)? (lug)
- To what degree and at what cost do we develop these energy and mineral resources? (ind)

Significance

- How significant are the mineral resources of each WSA when compared to the State as a whole? (psm)
- Are the mineral resources contained within a WSA significant enough to warrant the loss of wilderness? (lug)
- Mineral resource significance should be evaluated on a national scale. (ind)

- Would the designation of wilderness preclude the mineral development of Utah as a whole? (psm)

Adjacent Lands

- How would mineral resource development affect adjacent designated wilderness or otherwise protected lands? (lug)
- What potential exists for the development of mineral resources outside WSAs? These resources should be assessed to determine the impact of wilderness designation. (psm, lug, and ind)

Wildlife

General

- In identifying benefits to be gained from wilderness designation, BLM is obligated to consider that wilderness is the best and only permanent protection for wildlife in a natural state. (lug)
- In arid regions, many species of wildlife are very localized in their distribution. Wilderness designation would protect these species from ORV use, especially in canyon bottoms where their limited water sources are located. Driving through these small water sources for a "big splash" is challenging to some vehicular operators. (lug)
- In several areas of Utah, introductions of bighorn sheep have been used as justification for partial or total removal of horse herds. (lug)
- Wild horses and burros, dogs, and house cats should be eliminated from public land. (lug)
- Do we really know how designation would impact wildlife resources? (psm)
- Solitude provided by wilderness would enhance the success of desert bighorn sheep transplants; however, the success of these efforts could be hampered by wilderness designation. (psm)
- Protection of animal species' diversity through wilderness designation would serve in the future to indicate the effects of man on the biosphere. (ind)
- How is the value of crucial wildlife habitat weighed? (psm)
- What are the identified values of wildlife and wildlife habitat? (psm)
- It is understood by some that the "free-roaming bison herd" which is hunted in Alaska

is about 4 times larger than the Henry Mountain herd; yet this printed fabrication regarding the Henry Mountain bison herd is often seen. (ind)

- What would the provisions be for control of wild horses and burros? (ind)
- Where wildlife values are recognized as important, wildlife habitat (including critical/-sensitive areas) and riparian areas should have dominance over other resources in considering wilderness designation. (psm, ind)

Threatened and Endangered Species

- Protection of critical habitat for endangered or sensitive species (i.e., peregrine falcon) should be given strong consideration for designation of wilderness. (psm, ind)
- How would wilderness designation impact threatened and endangered species? (psm)
- WSAs with resource conflicts must consider the well-being of unique, threatened, and endangered species over the value of the conflicting resource because, in most cases, the damage to these species is irreversible. (ind)
- So that diversity is maintained, threatened and endangered species must be protected. (ind)

Management

- Would wildlife transplanting, including fish, be allowed in wilderness areas? Wildlife transplants could compete with livestock use. (lug)
- Would wilderness designation prohibit critical wildlife habitat (summering/wintering range) modification and management techniques (e.g., water development, chemical treatment, bighorn sheep transplants)? (psm, ga, ind)
- How would wilderness designation impact chaining and areas specially designated for wildlife management? (psm)
- What would be the impacts of designation on present/future wildlife management programs (i.e., habitat improvements and hunting)? Would water development to enhance wildlife habitat be allowed? (psm)
- How would wilderness designation affect the census of big game via aircraft? Would designation prohibit aerial census? (psm)
- Wilderness designation could prohibit the establishment of artificial water sources and the need to use aircraft or vehicles to conduct the bighorn sheep transplant. (ga)

- Wildlife and game management are important issues because of science and economics. (ind)
- How would nondesignation impact wildlife habitats/populations? Would this impact be beneficial or detrimental? Who would be responsible for wildlife management, State or Federal agencies? (psm)
- Would designation preclude opportunities to improve winter/summer range condition so herds could increase to prior stable numbers? (psm)
- Introduction of any new wildlife species inside a wilderness area should not be allowed. (psm)
- How would wilderness designation impact desert bighorn sheep transplants and big game reintroduction programs? (psm)
- How could big game be transported from far distances within the WSA? (psm)
- How would the use of helicopters and other aircraft for big game transplants be affected? (psm)
- Would predator control be allowed in designated wilderness? If predator control were not permitted, this could be detrimental to wildlife. (psm)
- How would designation impact access for wildlife and predator control? (psm)

Forest Resources

- What would be the impact of wilderness designation on timber harvest, firewood gathering, and cutting of posts and poles? (psm)

Livestock Grazing

- It is important to address the impacts of wilderness designation on livestock grazing. (psm, lug)
- Livestock grazing cannot co-exist with wilderness; therefore, it should be banned in designated wilderness areas. (ind)
- Livestock grazing permittees should not be given special consideration. (ind)
- Areas with wilderness quality should not be cheapened at the price of an Animal Unit Month (AUM). AUMs should not be given value in the wilderness recommendation process. (ind)

- Except for obvious conflicts like large-scale chaining, what is the conflict between livestock grazing and wilderness designation? (ind)
- Livestock are not part of the natural habitat. Livestock displaces wildlife and destroys the effect of true wilderness. (ind)

Management

- There is concern about the changes wilderness designation would impose on grazing management. (psm)
- What regulations and restrictions would be imposed? Explicit policies should be developed for livestock grazing in designated wilderness. This would help to better address impacts in the EIS and show permittees what to expect. (psm, lug)
- How would grazing permit transfers, adjustments in levels of use, return of suspended nonuse, etc., be handled? (psm)
- How would wilderness designation affect grazing management plans? What input would the permittee have and what kind of management flexibility would there be? (psm)
- What kind of access would permittees have for watering, sheep camps, livestock transport, salting, and maintenance of range improvements? (psm)
- Would there be any guarantees that grazing regulations would not become more restrictive in designated wilderness in the future? (psm)
- Would stockmen be reimbursed if there were any loss of grazing use? (psm)
- Could specific legislation be developed to accommodate certain developments, access, etc.? (psm)
- How would predators be controlled in designated wilderness? If predator control were not permitted, this would be detrimental to economic production of livestock, especially sheep operations. (psm, lug)
- Preservation of all existing access authority for grazing permit holders to utilize the most efficient motorized vehicles or other modern means to assure proper care and tending of livestock, range improvements, grazing management, fences, salt grounds, and water facilities without unreasonable restrictions is an issue and concern. (lug, ga)
- The exclusion of ORVs by wilderness designation would protect rangeland resources. (ind)

- Grazing privileges should not be diminished in designated wilderness because of non-use taken during a period of drought. (ind)
- Livestock grazing should be managed under BLM's existing system. Original grazing privileges should be honored, and access for equipment to maintain water resources, etc., should be preserved. (ind)

Forage Allocation

- Could an increase above current active preference in forage allocation be granted? How? (psm)
- There is concern that wilderness designation could cause or allow a change of priorities in forage allocation from livestock to big game. (psm, lug)
- Would wildlife be allocated AUMs above current use? (psm)
- Would new wildlife and big game species be introduced that could affect livestock grazing? (psm)
- How would wilderness designation affect grazing use? According to a Utah State University study, there has been an average loss of 50 percent of AUMs in designated wilderness in Wyoming. Utah livestock operators also generally believe this could occur in Utah. (lug, ga)
- Wilderness designation has been a concern to livestock producers since passage of the Wilderness Act of 1964. So far, problems have not been large because of the low amount of livestock use in designated wilderness. However, current activities in wilderness study, alternatives for designation, etc., have caused livestock operators to express concern. (lug)
- Any wilderness legislation adopted by Congress should preserve existing livestock permits and allow increases in grazing where range conditions allow. (lug)

Economics

- A dollar value should be given for resources that are protected or enhanced. (lug)
- The impacts of wilderness designation to grazing and associated livestock economies should receive detailed study and consideration. (psm)
- The importance of livestock grazing to local economics and county tax bases should be analyzed and emphasized. (psm)
- Mining and drilling activities could reduce an area's suitability for livestock grazing. (psm)

GENERAL ISSUES AND CONCERNS

- Wherever there is conflict between wilderness values and livestock grazing, grazing considerations should outweigh those of wilderness. (psm)
- The impacts of wilderness designation on livestock grazing should be addressed on a nationwide basis. (psm)
- The cumulative impacts (e.g., loss of forage, livestock management) of wilderness designation on livestock grazing should be addressed. (psm, lug)
- Would visitor use increase to the point that conflicts with or impacts to livestock grazing would result? (psm)

Range Improvements

- There is concern over how existing range improvements would be managed, operated, and maintained. (psm)
- Could mechanized equipment be used in a wilderness area? (psm)
- Would wilderness protection stipulations increase the cost of maintenance? (psm)
- Would permittees lose AUMs because certain range improvements could not be maintained (e.g., a silt-filled reservoir could not be cleaned and would result in loss of grazing suitability)? (psm)
- Livestock grazing in some areas depends solely on range improvements and their regular maintenance. (psm)
- What new or proposed range improvements would be allowed following wilderness designation? Which would not? (psm)
- Could non-native or introduced plant species be seeded in designated wilderness? (psm)
- Would range improvements and their impact on wilderness values be evaluated on a case-by-case basis? (psm)
- Would across-the-board rules on prohibition of certain range improvements be imposed? (psm)
- What are the impacts of various range improvements on wilderness values? (psm)
- Would wilderness designation allow for controlled burns for the purpose of improving rangelands? (psm)
- If there is any potential to increase livestock forage through vegetation manipulation or other means, it should be done (not constrained by wilderness management). (lug)

- What are all the existing and proposed range improvements/developments and other projects in each WSA? (lug)
- Range improvement projects such as pinyon-juniper chaining have a negative cost benefit, are not beneficial to the taxpayer, and should not be used to eliminate WSAs from consideration for designation. (ind)
- In wilderness designation considerations, it should be remembered that rangeland development provides increased production of livestock and wildlife. (ind)
- Water development provides increased use of forage (by improving distribution of livestock). This should be given consideration as an issue. (ind)
- Development of water is important for livestock. (ind)

Cultural Resources

- How would wilderness management affect archaeological studies? (psm)
- Archaeological values could be better protected in nonwilderness than wilderness. (psm)
- Would additional protection be applied to those cultural resources in wilderness? Would access be denied to fragile areas? What degree of protection would wilderness provide for archaeological sites? (psm)
- Would archaeological inventories be done prior to Congressional action on the WSAs? (psm)
- The same importance should be assigned to archaeology as it is to any other resource. (psm)
- All wilderness areas should be designated to protect archaeological resources. (ga, ind)
- Archaeological sites have not been identified in depth. (ga)
- Archaeological resources could benefit from wilderness management. (ga)
- The protection of archaeological sites under wilderness management should be analyzed. (ga)
- Archaeological resources should be protected. (ind)

Recreation

General

- How will wilderness needs be estimated? (psm)
- Would restrictions reduce recreational use and support? (psm)
- What is the relationship of potential wilderness areas to potential Wild and Scenic Rivers? (ga)
- Would there be conflicts between local users and backpackers? (psm)
- Wilderness provides opportunity for inspiration and relaxation. (ind)
- Designation as wilderness would enhance the spectrum of recreation opportunities on public lands. (ind)
- Development of water is important for visitors. (ind)
- How could the recreation potential of wilderness areas be developed? (psm)

Management

- Would designation affect river-running use or carrying capacity? (ga)
- How would designation affect hunting? (psm)
- Would hunting be restricted? What would be the policy on hunting? (psm)
- Would users present law enforcement problems on local communities? (psm)
- How would recreational use be managed? (psm)
- Would trails be marked? (psm)
- How would sanitation be managed? (psm)

ORV Use

- How would designation impact motorized recreation (ORV use), including snowmobiles, motorboats, and heavy equipment (tractors)? (psm)
- The conflict between primitive and ORV recreational use needs to be quantified. (psm)
- What would be the impact of excluding ORVs from San Rafael Reef? (psm)
- Would roads/ways historically used by ORVs be closed by designation? (psm)
- ORV use and backpacking are conflicting uses. What would be the impact of designation on ORV users? (lug)

- ORV use inside/adjacent to WSAs should be evaluated in terms of its economic benefits. What would be the impact of designation on those benefits? (lug)
- Could conflicts with traditional ORV use be rectified by cherrystemming roads, unique trails, etc.? (ga)
- Designation would interfere with ORV traffic. (ind)
- ORV conflicts could be alleviated by designating more areas like Little Sahara for exclusive ORV use. (ind)
- Areas conducive to the restriction of ORV use are fast becoming rare. (ind)
- If reasonable alternative use areas are available, conflicting uses (ORVs) should not be a factor in dropping all or part of a WSA. (ind)
- Because of present widespread ORV use in the six areas around the San Rafael Swell, they will never be manageable as wilderness. (ind)
- What are the pluses and minuses of ORV trails? (ind)

Increased Use

- How would designation affect recreational use? (psm)
- Would recreational use justify designation? (psm)
- Would recreational use increase to the extent that wilderness values (archaeology, aesthetics, water, wildlife, etc.) were degraded? (psm)
- What is present recreational use? (psm)
- Could increased recreational visitation damage sensitive desert ecosystems as much

as other uses (mining, grazing, urbanization, etc.)? (ind)

- Popular areas might have to be closed to permit recovery from trail erosion, littering, water impairment, localized deforestation (wood burning), and waste disposal problems caused by overuse. (ga, ind)
- Would use increase to the point that solitude would no longer be possible? (ind)
- Analysis should reflect the increasing demand for wilderness/primitive recreation. (psm)

Economics and Commercial Development

- The recreational potential of each WSA should be assessed since it is a major industry in many parts of Utah. (ind)
- Would private river running parties be crowded out by commercial operators? Would motors be allowed? If so, under what circumstances? (ind)
- Would recreational use in wilderness areas adversely affect tourism? (psm)
- How would commercial operators affect wilderness? (psm)
- What would be the recreation-related economic impact from designation? (psm)
- Wilderness could and should contribute to Utah's tourism industry. (ind)
- What are the buying habits of wilderness users? How would local economics be affected? How stable would that effect be? (psm)
- The economic benefits from recreation should be compared with other economic benefits foregone (mineral, agricultural, etc.). (psm)
- Would user fees be assessed? (psm)

Wilderness

Wilderness Values

- Designation should consider the importance and value of preserving undisturbed areas for future generations. (psm)
- Designation should not equate wasteland with wilderness. (psm)
- Would designation preclude later development of a resource if it would adversely impact wilderness values? (psm)
- What would the impact be on the area once designated wilderness compared to status quo? (psm)

- Instead of developing wilderness areas, we should better manage those areas that do not have wilderness values. There is a need to get more economic output from these areas. (psm)
- What difference does it make if the WSA is designated or not and what advantage is there to designating an area wilderness? (psm)
- Many areas will not change as a result of designation. Some areas are wilderness by nature of their location and topography. These areas will remain wilderness without designation. (psm)
- What kind of mitigation would be applied to protect wilderness values? (psm)
- Areas designated wilderness should have wilderness values which far outweigh other uses such as timber, minerals, and grazing. (psm)
- Recommendations should be based only on wilderness values. Resource conflicts should be resolved by Congress. (psm)
- What is the need for designation? Cannot undesignated areas be used for the same purposes? (psm)
- Nondesignation of areas should be analyzed relative to their effect on recommended areas. Wilderness values should be preserved for the future. (psm)
- What management practices/alternative designations would be used to protect wilderness values in areas not designated? (psm, lug)
- How would nondesignation impact wilderness values (visitor days, acres of habitat, archaeological sites, etc.)? (psm, lug)
- Wilderness values and uses can still be accomplished without wilderness designation. (psm)
- Wilderness values could be preserved under existing multiple-use management. Existing management for multiple use is sufficient. (psm)
- How would wilderness designation enhance the WSAs? (psm)
- What has preserved WSAs' wilderness values to date? (psm)
- The BLM has contracted external studies for mineral values but none for wilderness uses and values. Thus, there is an information imbalance against wilderness. What is being done to correct this? (lug)

GENERAL ISSUES AND CONCERNS

- Criteria used in analysis of wilderness quality ratings are subjective and not adequate for determination of suitability. (lug)
- If the BLM used a "suitability matrix" that further defined outstanding values as high, medium, or low, its use should be documented and available for public review. (lug)
- What wilderness values are present is a subjective judgment requiring maximum input and consideration? (ind)
- Nondesignation would result in loss of beauty, sense of freedom, and tourist appeal, including the value of wilderness to foreigners. (ind)
- The effects of development on wilderness values such as wildlife and scenic and cultural resources should be analyzed for nondesignation and other types of designation. (ind)
- Whether the BLM is recommending suitability or nonsuitability, an analysis should be made of the effects of development on wilderness values such as wildlife and scenic and cultural resources. A decision for non-wilderness is a decision to develop an area, and Congress must have enough information to make such a decision.
- BLM's awareness of other resources has impinged on its ability to identify outstanding wilderness qualities. An area called low overall wilderness quality is adjacent to two considered suitable. The only difference appears to be the favorable rating for tar sand on the one. In the Kaiparowits areas, coal deposits seem to affect the BLM's ability to detect wilderness qualities. (ind)
- Each WSA should be considered as an entire ecosystem and not just a scenic highlight. (psm)

Size

- What is the size criteria? (psm)
- How will size be used in determining designation recommendations? (psm)
- Do large WSAs contain areas that do not possess wilderness character? (psm)
- Will present recreational use influence size of the areas recommended for designation? (psm)
- Could the size of wilderness areas be increased if there are no conflicts? (psm)
- Wilderness would withdraw large parcels of land from multiple-use potential; therefore, the size and number of areas where duplication of wilderness values would occur should be minimized. (lug)
- We have to preserve as much wilderness as possible; there will never be more than there is now. (ind)
- Wilderness is wilderness no matter how big or small. (ind)
- Larger WSAs should carry more weight because of manageability, more buffer, internal diversity, a greater range of experiences, etc. (ind)
- There should be more lumping and less splitting of areas (e.g., due to a track called a road by someone). (ind)
- BLM is trying to minimize acreage rather than objectively assess wilderness quality. (ind)
- The explanations given for the acreages deleted from WSAs in the preliminary planning suitability recommendation are very incomplete or lacking entirely. (ind)

- Utah BLM uses a "divide and conquer" approach to cut up roadless areas and deny WSA status to their several sections. (ind)
- No one criterion should be used to cut acreage from a suitability recommendation. In particular, areas should not be dropped because wilderness characteristics are not "outstanding enough." (ind)
- How will the relative value for wilderness characteristics be determined/quantified? (ind)
- Will too much area be designated as wilderness; is too much of the State in WSA status? (psm)
- Who should decide how much area is designated and how much is enough/needed or desirable? Is there a top limit? (psm)
- What is the percent of wilderness area in Utah compared with other states and the nation? (psm)
- Should all areas in San Juan County/southeastern Utah that meet the criteria be designated? If so, would not that be an unfair burden? (psm)
- Is too much of San Juan County already in wilderness or park status, which limits resource uses? (psm)
- If demand for wilderness increases, could more area be designated? (psm)
- Are some counties becoming playgrounds? (psm)

Naturalness

- WSAs are not natural (e.g., tamarix and bison are introduced species). (psm)
- WSAs should not be dropped solely because they contain roads. (psm)

The Henry Mountains, view from Mt. Ellen-Blue Hills WSA into Bull Mountain WSA

GENERAL ISSUES AND CONCERNS

- How will the naturalness criteria be handled? Do some areas contain too many intrusions (roads/ways, corrals, developments, etc.)? (psm)
- Were the naturalness criteria consistently applied? Portions of WSA's are believed to contain significant intrusions. (psm)
- Can areas with roads/ways meet wilderness quality criteria? (psm)
- How would cherrystemmed areas impact values? (psm)
- There are no clear criteria for roads versus ways, yet WSA boundaries and recommendations have been based on these intrusions. (lug)
- Cherrystemmed areas are inconsistent with wilderness values. (lug)
- Where visual intrusions (existing or probable) in surrounding areas are visible from the majority of the WSA, it should be considered unsuitable for designation. (lug, ind)
- It should be determined whether or not noxious weeds are part of the natural wilderness ecosystem. (ga)
- Unobtrusive structures and the existence of ways and signs of ORV use within a WSA should not exclude it from wilderness designation. (ind)
- It is not required that signs of man's presence be absent in wilderness areas. (ind)

Opportunities for Solitude and Primitive, Unconfined Recreation

- The criteria for opportunities should not be further graded/scaled beyond outstanding. (psm)

- How were naturalness and opportunities for solitude and primitive recreation assessed? (psm)
- How were the precise percentages of WSA areas containing values meeting and exceeding solitude criteria determined? At what percentage does a WSA become suitable? (lug)
- How would outside sights, sounds and smells affect wilderness quality? (ga)
- Outside sights and sounds should never be a factor in an unsuitability recommendation. (ind)
- Man's need for solitude in a pristine setting is a consideration. (ind)
- Topographic and vegetative screening are not completely necessary for solitude. The level of use should be considered as well. One can feel isolated in areas that are wide open, flat, and relatively vast. (ind)
- Only unspoiled and partially spoiled areas should be protected where man can reflect and enjoy the work of the Creator. (ind)
- Denatured landscapes vastly outnumber unspoiled ones. Opportunities should be assured for solitude and the wilderness experience. WSAs would provide this. (ind)
- Boundaries should include peripheral areas that are inherent to the ecosystems irrespective of their recreational value. Dropping these areas would decrease the value of the remainder of the WSA. (ind)
- Alternative control strategies or opportunities which could mitigate opportunities lost in wilderness areas should be identified. (ga)

Special Features

- When and how would wilderness designation protect important scientific values? (psm)
- How could unique canyons and deserts be protected without wilderness designation? (psm)
- How would nondesignation impact outstanding areas? (psm)
- In BLM's wilderness study, such factors as wildlife habitat, threatened and endangered plant and animal species, cultural resources (i.e., rock art and cliff dwellings), geological points of interest, and scenic qualities need to be examined. By and large, BLM has done a superficial job on supplemental wilderness values. Areas with high supplemental values should be weighed adequately. (psm)
- How are resource development values weighed against supplemental values (i.e., wilderness, archaeological, etc.)? Six of nine identified issues in the introductory pamphlet emphasize criteria other than wilderness. (psm)
- The use of wilderness designation is needed for the preservation of scientific resources. Underfunding does not allow for protection of scientific resources on BLM lands (e.g., vandalism of archaeological sites continues). Often scientific values are not known until new ideas need testing. Pack rat nests or middens certainly need to be inventoried and protected. (lug)
- Unique special features/supplemental values should equal economic development values in determining suitability. (lug)
- Do the WSAs have value for scientific study? (lug)

The Henry Mountains, view from Mt. Ellen—Blue Hills WSA into Mt. Pennell WSA

GENERAL ISSUES AND CONCERNS

- Supplemental values were not addressed in enough detail. Rating systems were used in violation of the Wilderness Study Policy. The study phase must allow for additional field work in wildlife habitat, threatened and endangered plant and animal species, cultural resources, geologic special features, and scenic quality. (ind)
- There is a need to preserve cultural resources, unique geology, habitat, and scenic quality. (ind)
- Archaeological sites, geologic features, and rare and endangered plants and animals should be emphasized. (ind)
- Unusual scenic values should be weighed in full competition with consumptive resources; economic values should not supersede. (ind)
- Boundaries should include mesas and ridge-tops, wherever possible, such as Bert Mesa and Cedar Point. (ind)
- Existence of solitude, geologic features, cultural resources, threatened and endangered plant and animal species, and wildlife habitat are what today's wilderness areas are all about. (ind)
- Scientific values of the area (i.e., bristlecone pine, packrat middens [for dating purposes], isolated water resources, oil and gas [energy], and renewable resources) should all be considered in designating wilderness. (psm)

Geographic Distribution

- Designation should consider the area's own merits, not geographic location. (psm)
- Balancing geographic distribution should not be an issue in wilderness designation. (psm, ind)
- It appears that some areas were excluded because they were too close to urban areas. Other areas were dropped because they were too far. (psm)
- Utah has unique and extremely high quality wilderness and should be judged on a national standard. These areas will be visited by citizens of far-ranging cities. Because of the high quality, Utah should have a large acreage in wilderness. (ind)
- Distance from population centers is not really an issue. (ind)
- Too many Utah WSAs are compared with each other. (ind)
- In areas of heavy use (Escalante and Grand Gulch region) as much area as is practical

should be designated to provide alternate areas to absorb high use, prevent excess damage to premier areas, and protect Indian ruins. (ind)

- BLM districts should consider grouping qualified areas into complexes, such as the Grand Gulch Complex. (ind)
- Wilderness should be close to population centers. (ind)
- Criteria should be expanded to consider the proximity of WSAs to major transportation corridors. (ind)
- Wilderness should be located far away from population centers. (ind)
- Put wilderness in northern Utah. (ind)
- Do not use geographic distribution to eliminate areas. (ind)
- Disperse wilderness areas as much as possible. (ind)
- Do not put wilderness in one geographical area. (ind)
- Too much wilderness in southeastern Utah would have a negative economic impact. (ind)
- Geographic distribution should be used to include areas. (ind)
- Maximum distribution of wilderness would ensure maximum economic benefit. (ind)

Need for Wilderness

- Why do we need wilderness when it is already protected under multiple use? (psm)
- What would wilderness protect that is not already protected? (psm)
- If there are areas which meet the criteria, do they need to be designated to make them wilderness? (psm)
- Why designate wilderness when only 8 to 10 people use the area in a year? (psm, lug)
- Can we afford not to have wilderness? (psm)
- Wilderness would provide a national heritage preservation of a birthright for future generations. (psm)
- No new Utah land should be designated as wilderness. Utah now has more National Parks and recreational areas under Federal protection than any other State and has abundant public land available for recreational use. There should not be further redundancy in locking up more public lands for a very restricted use by a very few people. (lug)

- Each of the listed WSAs should be a prime candidate for the National Wilderness Preservation System (NWPS). The fact that these lands are still wilderness, at this late date, is in itself more than sufficient demonstration that they have no greater value to our country. (lug)
- These WSAs should be considered priceless and irreplaceable. When they are gone, we cannot draw from any talent to duplicate them. Preserve as much wilderness as possible. (ind)
- What is left of the Escalante drainage should be preserved. (ind)
- Who benefits, Utahns or all Americans? Future generations or just us? State boundaries are meaningless. The lands in Utah are part of a greater whole. We are to protect our planet. (ind)
- Most WSAs are wilderness enough so that you cannot get there without a struggle anyway. Please do not take the land away from us. (ind)
- The fact that these wonderful spots are in close proximity to Utah's existing national parks and lie in a State where hostility to the wilderness idea exists at all levels of public life from the county commissioners all the way to the State legislature has kept them from being protected. (ind)
- There is a disproportionate amount of non-wilderness to wilderness, overuse of existing wilderness, and lack of geographical balance. (ind)
- Psychologically, it is reassuring to know that there is a lot of undisturbed land out there, even if it may be difficult to reach. (ind)
- We have enough wilderness areas as it is. The only people that can use them are the rich, young people, and they are not the majority of the people. (ind)
- There is enough wilderness already; it would be better utilized with more hiking trails, routes, and better information service. (ind)
- There is a future need for unspoiled land for recreation. Human population is growing; industrial impact is likely to grow. (ind)

Conflicts With Other Resources

- A WSA should be designated unless it has substantial or valuable mineral/energy reserves or would interfere with development of major resources, timber, or grazing. (psm)

- The presence of only one conflicting resource value should not preclude wilderness designation of an area. (psm, ind)
- All WSAs with no resource conflicts should be designated wilderness, but designation should not be limited to only those areas. The basic policy should be to designate WSAs as wilderness unless there are serious overriding considerations. (psm)
- How heavy will conflicts be weighed in designation of WSAs? (psm)
- Can the resources within WSAs also be found outside boundaries? (psm)
- Will buffer zones, integral vistas, and air quality standards be part of BLM's decision on wilderness designation? (psm)
- Wilderness areas should be protected until development is justified or necessary. (psm)
- Because wilderness is a Federal issue and a national concern, local considerations (although valid) should not be overriding in deleting WSAs from the system. (psm)
- Who are going to be the beneficiaries of a designated wilderness? (psm)
- Being able to see developed areas from wilderness areas should not preclude wilderness. (psm)
- How would conflicts with wilderness designation be resolved? (psm, lug)
- Conflicts should be specifically identified and quantified. (psm)
- How would conflicting resource values be weighed? (psm)
- How would wilderness management impact/restrain other resources/uses? (psm, lug)
- Would designation preclude optimum management? (psm)
- Perceived conflicts with some resources (i.e., inholdings, corridors, leases, development) should not preclude designation because, in many cases, they could be resolved. (psm)
- Wilderness use conflicts should consider availability of those resources or activity areas outside WSAs. (psm)
- Outstanding/natural wilderness values should have equal weight as mineral and energy resource values. (psm)
- How would local versus national concerns/values be resolved? (psm)
- Will conflict analysis consider the long-term nature of natural values versus short-term economic (resource development) values? (psm)

- There is a lack of consistency applied throughout the State concerning conflicts with wilderness. WSAs have been called unsuitable due to local opposition (e.g., county commissioners). This is inappropriate. (lug)
- WSAs have been reduced in size because of resource conflicts (e.g., Mexican Mountain WSA). There has to be a point where wilderness values (a valuable resource) outweigh other resource values. The areas that have survived are prime areas and should stay in regardless of conflicts with minerals. (lug)
- Areas where coal development and related activities would occur should not be proposed for designation. (lug)
- Recreationists are hostile to grazing permits. (lug)
- How would designation affect development outside the WSA? (ga)
- How would designation affect low-level Air Force training flights? (ga)
- In the long term (hundreds or thousands of years) mineral development is not nearly as important as the preservation of wilderness values. (ind)
- What would be the impact of nondesignation of an area on an adjacent wilderness area? (ind)
- Resource conflicts are not sufficient evidence for eliminating a WSA. Why not make other resource uses justify eliminating wilderness rather than vice versa? (ind)
- The appropriate bias of public land planning is toward renewable resources and values which increase through time and with use, rather than towards the nonrenewable resource values which have dominated BLM's planning process to date. There is no excuse for BLM's bias toward minerals production other than to enrich a tiny (and already heavily subsidized) part of the population at the expense of the rest of us. (ind)
- When there is a conflict between wilderness values and recoverable resources, the values should be weighed carefully. Speculative mining claims and oil and gas leases alone should not be proof of resource potential. (ind)

Lack of Wilderness Data

- BLM people involved must have a personal, on-the-ground knowledge of WSAs. (psm)
- BLM needs better information to make better decisions. Additional information should be gathered on mandatory wilderness values

(i.e., solitude, recreation, and naturalness) and supplemental values (archaeology, scientific [botany, geology, and wildlife], scenic, and educational values). The Forest Service (FS) wilderness studies of visitor use statistics from the Missoula, Montana testing station should be used in wilderness recommendations. (psm)

- Existing wilderness data are inadequate. (ind)
- BLM needs to guarantee the identification and recovery of unknown economic and natural resources (i.e., wilderness values) in the WSA. These unknown values may be present in designated and undesignated areas. (psm)
- How should we protect the "unknown" natural resources (e.g., medical and other unknown values of plants, etc.)? (psm)
- More time is needed for BLM to go back and inventory supplemental wilderness values as part of the study. (psm)

Wilderness Review Process

- Why the rush? Congress gave BLM until 1991 to complete the wilderness review. The Reagan Administration is rushing to meet a 1984 deadline, regardless of quality. In Utah, the EIS preparation time has been cut by 8 months. (psm)
- If a WSA is presently covered by other Federal laws, it should not be designated wilderness. (psm)
- BLM should not use existing WSAs. (psm)
- Existing WSAs are using a definition for basis of designation. This is not adequate. (psm)
- How do you establish a priority/criteria in an objective way? (psm, ind)
- It appears that some areas not meeting the criteria were proposed for designation. (psm)
- In determining WSA recommendations, why did BLM ignore legislation, acts passed by Congress, and legislative history and intent? It appears that BLM used arbitrary criteria. (psm)
- What was the rationale for deleting acreages of some inventory units? (psm)
- What were the criteria used and by what authority? (psm, ind)
- Have potential wilderness areas already been dropped? (psm)
- Why, in some cases, were partial alternatives not developed to minimize conflicts (e.g., energy and mineral, rights-of-way, access) with wilderness designation? (psm)

GENERAL ISSUES AND CONCERNS

- Why are some areas which were recommended as unsuitable a year ago still being studied? (psm)
 - Conflicts which resulted in a preliminary unsuitable recommendation were not adequately documented. (psm)
 - The wilderness review process takes too long, causes conflicts, and precludes other uses. (psm)
 - The following terms need to be clearly defined and consistently applied: wilderness area (its purpose), human environment, solitude (in terms of remoteness, screening, amount of use, intrinsic and spiritual value), unconfined recreation, road (level or degree of maintenance), way, manageable, and aerial overflights. (psm)
 - Can areas excluded from review be reconsidered for designation later? (psm)
 - Areas under appeal should be analyzed as WSAs. (psm)
 - Courts prolong the process (study and restudy) and prevent development of pre-FLPMA rights. (psm)
 - Are wilderness areas subject to the right-of- eminent domain (can it be condemned for other use)? (psm)
 - As a result of BLM already determining suitability based on issues peripheral to resource conflicts, Congress is being deprived of its initiative provided solely to itself in the Wilderness Act and FLPMA. (lug)
 - The BLM wilderness review process is not as open as it should be. An example is the refusal to give the public copies of the revised SSA reports. (psm, lug)
 - Ranking of WSAs by importance is inappropriate and is not valid or reasonable. No one is familiar with all of them. (lug)
 - Wilderness quality ratings are subjective and inappropriate for justifying unsuitable recommendations. (lug)
 - The BLM has failed to justify its inventory phase decisions and, subsequent to remand, its preliminary recommendations on contested units. (lug)
 - WSA status should be granted to all appeal areas and, thus, wilderness suitability should be judged on the same basis as all other WSAs. (ind)
 - It is premature to make recommendations on appealed areas until the Interior Board of Land Appeals (IBLA) decisions on the areas have been handed down. (ind)
 - The landform quality rating in the scoping document violates the Wilderness Study Policy; also, no explanation of how and by whom this rating was performed is offered. (ind)
 - Some excellent areas have been unjustly dropped; thus, Congress will not get a true picture of wilderness suitability. There should be a consistent recommendation with no double standards. (ind)
 - Whoever makes the decision on wilderness designation ultimately should have enough information, including personal study, so that he or she can make honest decisions. (lug)
 - It is a mistake to use the scoping process, inventory, and site-specific analysis to introduce political aspects into the wilderness review. It is not the task of the Utah BLM to determine how much wilderness is politically acceptable. BLM should be determining, with public input, which of its lands are manageable as wilderness. The final result of the wilderness review ought to be a menu from which Congress can choose. (ind)
 - It should not be left to the public to explain to the BLM what the BLM's own policy says. (ind)
 - How do we obtain agreement about which areas should receive priority? (ind)
 - BLM should act now to correct the anti-wilderness bias of the Utah review, eliminate politics, and follow the rules in the Wilderness Study Policy. (ind)
 - Is wilderness designation of Federal lands constitutional? BLM should check Article 8 of the Constitution. (psm)
- Access**
- With restriction of motorized access, how would those who cannot hike (i.e., the aged, families with small children, handicapped, etc.) obtain access to areas designated? (psm)
 - Motorized access restriction could make most designated areas, including traditional use areas, unusable to a lot of/or the majority of people. (psm)
 - Designation would discriminate in favor of an exclusive group of people (young, healthy, affluent). (psm)
 - What percent of the people would benefit from designation? (psm)
 - How would recreationists obtain access to designated areas? (psm)
 - Would use be reduced because of difficulties of access to designated areas? (psm)
 - Would access be developed to the boundaries of designated areas? (psm)
 - Would remote areas be effectively closed to primitive recreation due to inaccessibility? Some highly scenic areas would be inaccessible to the majority of people. (psm)
 - What would be the impact of designation on potential and existing corridors (power, pipeline, and mineral development) that cross some WSAs (especially in the San Rafael Swell and Escalante areas)? (psm)
 - In San Juan County, some ways which provide access to school sections for hunting, wood gathering, recreation, and economic operations have been classified as D-system roads. What would be the impact of designation on these roads? (psm)
 - Would access be allowed for development of resources on State and private lands? (psm)
 - Would any access through designation areas be maintained or must those areas be circumnavigated to get to other areas? (psm)
 - Lack of easy access should not rule out wilderness. (psm)
 - Motor vehicle access should be provided for control of fire, noxious weeds, insects, and disease wherever they pose threats to resources or adjacent property. Reasonable substitute access should be provided where existing access is obstructed by natural disasters or public improvements such as reservoirs, etc. (lug)
 - A single road with controlled traffic would permit access to more citizens. A lack of roads would limit access to very select groups of the general population. (ind)
 - More cherrystemmed ways/roads should be used to improve access/logistics for visitors; BLM should leave in existing and necessary communication corridors as required. (ind)
 - The Glen Canyon National Recreation Area (NRA) 1972 Enabling Act (Lloyd Act) directed a study of proposed road alignment within and adjacent to the recreation area. If a road were constructed, it could impact several WSAs. (psm)
 - Ninety percent of the people spend 90 percent of the time within 1.5 miles of a road. (psm)
 - There is potential for roads in Davis Gulch and Llewellyn Gulch for better access to the area and to Lake Powell. (It would save 6 hours in driving time to reach Lake Powell for local people.) (psm)

Fifty Mile Mountain WSA

- Wilderness should contain one road per site or area to allow more people to enjoy the wilderness. (ind)

Land Use and Land Use Plans

- Discuss land use conflicts as a result of wilderness designation. (psm, lug, ga, ind)
- Discuss the compatibility between wilderness and the multiple-use concept. (psm, lug, ga, ind)
- Would BLM wilderness areas be consistent with other adjoining Federal lands? (psm, lug, ga, ind)
- Would wilderness designation be consistent with local and State land use planning? (psm, lug, ga)
- How would wilderness designation affect private and State inholdings? (psm, lug, ga, ind)
- There should be immediate permanent release language to end land use uncertainty. (lug)

- The WSA boundaries include farms and grazing allotments; these should be excluded. (lug)
- Wilderness does not lock up resources and is compatible with most uses of the land. Wilderness is multiple use. (ind)
- BLM does not understand themselves to be guardians of a national resource belonging to all Americans. Instead, districts seem to feel that the land and resources they manage belong to them and that their only mission is to grudgingly give up these resources to local interests on demand. (ind)
- BLM should educate the public on benefits of wilderness as well as the drawbacks. Consider the economic plus of wilderness land. Which resource will last longer—one taken out or one that stays there? Wilderness can support as many or more activities as other management options. BLM should be more active in educating people about all the facets of wilderness but are not very enthusiastic at the moment. (ind)

Economics

- Cost/benefit analyses are needed to identify wilderness economic trade-offs. (psm, lug, ga, ind)
- What would be the cost of maintaining wilderness values? (psm, lug, ind)
- What would be the administrative costs of maintaining wilderness areas? (psm, lug, ind)
- What local economic effects would wilderness designation create? (psm, lug, ind)
- Instead of developing wilderness areas, we should better manage those areas that do not have wilderness values. There is a need to get more economic output from these areas. (psm)
- How would wilderness designation affect the regional and national supply for products and services? These products include minerals, firewood, water, wildlife, grazing forage, etc. Service includes wilderness activities, ORV use, etc. In the past, BLM has not considered sources or availability of products and services from outside the roadless areas. (lug)
- Wilderness designation is the least expensive way to protect natural values such as wildlife habitat, watershed, etc. (lug)
- There could be a cost benefit involved should designation of a particular WSA substantially reduce potential threats to a threatened or endangered species. This would reduce or eliminate recovery costs. (lug)
- The potential for enhancing the State economic base through development of recreation should be addressed. Complexes of National Parks, forest lands, and BLM wilderness could provide centers for development. (ga)
- Natural resources will always be an issue; therefore, careful consideration should be given to designating wilderness in areas with natural resources of high economic value. (ind)
- What is the economics of management as wilderness versus developed lands? (ind)

Social and Public Attitudes

- How would local communities be involved in wilderness designation? (psm, lug)
- Wilderness designation should include a national as well as a local perspective. (psm, lug, ind)

GENERAL ISSUES AND CONCERNS

- How would wilderness designation affect lifestyles and local culture? (psm)
- Designation of a wilderness area should be in the best interest of local people. (psm)
- Grand Junction should be added to the list of Standard Metropolitan Statistical Areas (SMSAs). (psm)

Other Issues and Concerns

Scoping

- An appellant organization was concerned because it did not receive advanced mailing or notice of a public scoping meeting. (lug)
- There should have been a public scoping meeting held in Cedar City, Utah. There is a long history of interest in the Cedar City area, and several people were not able to attend the St. George meeting because of the travel involved. (lug)
- There is concern about the speechifying by Washington County Commissioners as a normal function of public scoping meetings. (lug)
- The scoping pamphlet is pictorially slanted to promote wilderness at the expense of wildlife. (lug)
- BLM should open its process to continuing public participation (prior to publication of the EIS). (lug)
- Wilderness is not just a local issue, but of national concern as well. In Utah, written comments, public meetings, and public polls show continued strong support for wilderness designation. Such public interest should be reflected in the overall proposals. (ind)
- The public should have some part in the wilderness designation decision-making process. (ind)
- A public scoping meeting should be held in Phoenix, Arizona. (psm)

Analysis of SSAs

- The SSA analyses are defective because no attempts were made to specify the benefits that would flow from wilderness protection of resources or to specify the losses that would occur from nondesignation. (lug)
- Were the acreage additions listed in the brochure in response to SSA public comments for Richfield, Moab, and Cedar City? BLM has had these comments since November 30, 1982. (lug)

- Criteria for designation is applied so erratically that it appears as though BLM wanted to throw out some areas regardless of wilderness characteristics. (lug)
- Has the number of AUMs given in the SSA alternatives changed? Can there be differences between alternatives?
- All developments that would degrade wilderness values should be described on a map and in text in each SSA. It is not clear that all proposed projects or projects under way have been identified. (lug)
- Maps, charts, and documents need to be of better quality and should be readable. (lug)
- The BLM did not respond to comments given on the SSAs. The BLM decisions have not altered. It is not certain that comments on SSAs have been given adequate attention by the agency. It is requested that previous comments on SSAs become part of the record for the scoping process. (psm, lug, ind)
- The rapid publication of the various SSAs is vital to informed public comment. Previously, copies have been difficult to obtain because the local county courthouse was the only place to see all of them. There is no need to wait until the Draft EIS is released to publish the SSAs. Once they have been reviewed and revised as needed, they should be disseminated rapidly in a single volume to a wide public audience. (lug)
- Why were some areas containing scenic values judged in the SSAs as lacking in recreational qualities? (lug)
- The SSAs are inconsistent. Wilderness characteristics were handled differently in each District (e.g., Kaiparowits Plateau solitude evaluations ignored everything but screening, and the wilderness values of Floy, Flume, and Coal Canyon WSAs were dismissed in favor of "small" speculative oil/gas reserves). (psm, lug)
- The BLM failed to address public participation during the SSA process, possibly in violation of the National Environmental Policy Act (NEPA). Use of public comments to develop suitability recommendations should be documented. (lug)
- A detailed inventory of wilderness values was not included in the SSAs for remanded areas; therefore, BLM cannot make supportable recommendations on those areas. (lug)
- SSAs on remanded areas should not have appeared until final resolution of the appeal. (lug)

- SSAs are contradictory and do not contain adequate data.
- The SSA assumption of insignificant increases in recreational use is questioned based on experience elsewhere. (ga)
- Some SSAs (i.e., WSAs in Cedar City District) were illegally rated and compared on some obscure relative scale. (ind)
- The SSAs give no indication that they resulted from decisions by the IBLA. The appeal and subsequent ruling should be explained. (ind)
- Scenic quality descriptions in the SSAs should be in detailed, descriptive terms as was done in some of the Moab SSAs. (ind)
- In same SSAs, Cedar City and Richfield districts' use of rating systems to decide if outstanding wilderness characteristics were outstanding enough violates the Wilderness Study Policy. (ind)
- The study phase has, with the exception of the Moab District SSAs, neglected the supplemental wilderness values (special features) of WSAs and concentrated on a rehash of mandatory wilderness characteristics. Does this violate the intent of Congress? (ind)
- Within SSAs, acres of certain WSAs and acres of grazing allotments within those WSAs do not, in some cases, add up to the same number. Why? Is this because of boundary adjustments or rounding off? (lug)

EIS Analysis

General

- The EIS should analyze long-term uses and needs as well as negative impacts nationwide. (psm)
- The EIS should address irreversible and irretrievable impacts. (psm)
- Maps, charts, and documents need to be of better quality and should be readable. (lug)
- Landform and vegetative types should be better defined in the EIS. (lug)
- The EIS should try to remove some of the misconceptions that have caused polarization regarding wilderness. (psm)
- Terms "prowilderness" and "prodevelopment" should not be used in the EIS or by the EIS team. (lug)

Appeal Areas

- Why are appeal areas not under study in the EIS? Why are several Instant Study Areas (ISAs) not included? (lug)

- How will appeal/remand areas be handled if they are added to the WSAs? (psm, lug)

EIS Preparation Team

- Names, sex, schooling, environmental affiliation, technical or social degrees of the people who made the EIS studies should be given. (lug)
- Some BLM staff members need to be better informed as to wilderness review and management. (psm, lug, ind)
- Bias against WSAs on the part of BLM employees is a concern. (ind)
- The EIS team should consist of members from each district rather than the same district. (ind)

EIS Time Frame

- Congress gave BLM until 1991 to complete the wilderness review. A more thorough study should be conducted over another 1 to 2 years. (psm, ind)
- What time constraints will there be for preparation of the EIS? (psm)

Statewide EIS

- There is concern about the validity of doing a Statewide EIS. Because of the large number of WSAs, geographic dispersion, etc., considering them all in one document seems about impossible. To have a substantive review by interested parties, the comment period should be very long (e.g., 180 days). (psm, lug)
- The Utah BLM has aggregated wilderness study into a Statewide EIS. The Wilderness Study Policy allows this only under four specific situations. None of these situations exist in Utah. What authority does the BLM have to make this deviation? (lug)

Issue Identification

- What is an issue? BLM must address anything of high public concern or controversy in the EIS. (psm)
- The EIS should address major issues identified in the wilderness brochure. (psm)
- The criterion "be of high public concern or controversy" should not be used as an excuse to exclude a vital issue from consideration. (lug)
- Under substantial environmental impacts, consideration should be given to direct, indirect, and cumulative impacts. (lug)
- Utah Statewide EIS comments should be in the same format as the Grand Resource Area Resource Management Plan (RMP)/EIS. (lug)

- The BLM has posed a set of questions which are called issues. These should not interfere with rigorous analysis and should be developed so as to demonstrate in measurable quantities the effect of each alternative on each issue. (lug)
- Unresolved issues from the initial inventory should be resolved in the EIS. (psm)

Conflicts With Other Resources

- The EIS should clearly define the possible expansion of grazing, access, development of water rights, and predator control. (lug)
- The relationship between wildlife/livestock, wild horses and burros, etc., should be considered in the EIS. Both beneficial and negative aspects of wilderness designation should be analyzed. An example is the livestock/bison situation in the Richfield District. (lug)
- What changes may occur from what is stated in the EIS about grazing use, cherry systems, etc., and the final Congressional language? (lug)
- The EIS should point out that wilderness designation in no way implies reservation of existing or natural streamflow through an area designated wilderness. (ga)
- Site-specific as well as cumulative impacts on salinity and erosion control potential should be determined for each alternative in the EIS. (ga)
- The EIS should identify which noxious weeds are present in each WSA. (ga)
- The EIS should assess predator control within wilderness areas and the potential conflicts between wilderness values and predator control methods. (ga)
- The EIS should assess the impacts of wilderness designation on range improvement activities. Chaining, seeding, water developments, and fencing are often essential to livestock operations. (ga)
- The EIS should analyze the effects of wilderness designation on transplants of desert bighorn sheep. Although solitude would enhance success, designation could prohibit the establishment of artificial water sources and the use of aircraft or vehicles to conduct the transplant. (ga)
- The EIS should erase "wilderness myths" concerning impacts to grazing, hunting, water developments, and watershed. (psm)

- The EIS should be more than a cost/benefit analysis. It is very difficult to assess the worth of solitude, wildlife, physical challenge, and other intangibles. (ind)
- The analysis should consider a worst-case situation and the statewide impact on wilderness, development, mining, water developments, etc. (psm)

Manageability

General

- How would wilderness designation affect aviation (i.e., Air Force training, commercial airlines), search and rescue, medical emergency, livestock searches, etc.? (psm)
- What are the health and safety implications to the region where a wilderness area would be located? (psm)
- A discussion of health and safety management inside WSAs is necessary. (psm)
- What type of management would a wilderness area receive if not designated? Nondesignation could change an area by allowing a population influx and development activities. (psm)
- Would wilderness values be degraded by overflights in areas under commercial flight paths? (psm)
- There should be no sonic booms in wilderness. (psm)
- A discussion of boundary adjustments as they might affect wilderness manageability is needed. (psm, lug)
- What protections are WSAs and appeal/remand areas given until Congress decides on designation? (psm)
- How would management of areas designated differ from that of the IMP? (psm)
- How rigorous is enforcement of IMP guidelines? (psm)
- Would management of wilderness differ between BLM districts and/or other levels of administration? (psm)
- Would BLM continue to accept acreage additions based on improved manageability? (lug)
- Manageability should be deemphasized as a criteria for denying designation. Just because it may be difficult (e.g., ORV control) does not mean it could not be managed by some means (fences, ranges, etc.). (ind)

GENERAL ISSUES AND CONCERNS

- Appeal areas should be included in EIS analysis. (ind)
- Boundary adjustments should follow statewide criteria set forth in the EIS. (ind)
- Consideration should be given to moving boundaries out to improve manageability instead of making the area smaller if the boundary is unmanageable. (ind)
- How did the figure of 55-percent designation of the total WSAs arise as an alternative? Was it the sum of the district managers' recommendations or did it surface as an attempt to placate pro-wilderness groups and avoid litigation? I get the impression that some areas were dropped just to reduce the acreages recommended. BLM's decisions should be justified. (ind)
- Would management of designated areas be compatible with adjoining areas? (psm)
- WSAs adjacent to units of the National Park Service (NPS) should be studied for transfer to enhance manageability. (ind)
- Deleted WSAs which are adjacent to other wilderness areas are some of the most important since they usually make the legal boundaries fit the ecological boundaries better and enhance manageability. (ind)

Use Restrictions and Enforcement

- What kind of activities would be allowed or disallowed? (psm)
- What restrictions would be placed on users? (psm)
- Who would make the decision and how would restrictions be determined? (psm)
- Would the number of users be regulated and to what extent would use be scrutinized? (psm)
- Would management change over time as conflicts arose? (psm)
- Who would manage the areas and where would the funds come from? (psm)
- Who would enforce laws in wilderness areas? (psm)
- How would designated areas be kept clean? Who would perform search and rescue in wilderness areas? (psm)
- How would ORVs and woodcutters be excluded from the areas designated? (psm)
- After designation, what conditions or restrictions would be placed on activities such as mining, grazing access, emergency use, insect control, and fire control? (psm)

- Would traditional uses be honored in wilderness areas? (psm)
- Designation would have a negative impact (i.e., litter, stream degradation, and erosion from trail overuse). (psm)
- How would predators, noxious weeds, insects, and other pests be controlled in designated wilderness? Both human hazard problems and wildlife management problems should be considered. Take the worst-case approach and show Environmental Protection Agency (EPA) restrictions also. (psm, lug, ga)
- Could pesticides be used in wilderness areas? (psm)
- Could pesticides be used upstream from wilderness areas? (psm)
- Concerning pest control, use of pesticides, etc., would there be a buffer zone around wilderness areas? If there were a buffer zone, what would be prohibited in it? (psm)
- How would illegal activities, such as marijuana culture, be handled in designated wilderness? (psm)
- Would aircraft be allowed to fly over wilderness areas, or would flights be restricted/prohibited? (psm)
- Will there be an acceleration of management prohibitions in the interim between designation/release? (lug)
- The IMP must be enforced to prevent alteration of wilderness potential. (ind)
- The BLM should adequately train personnel and establish and enforce procedures under 43 Code of Federal Regulations (CFR) to protect wilderness lands. (ind)

Maintenance

- How would maintenance needs be handled (i.e., upgrading access roads, parking areas, flood control culverts, road/highway realignment, etc.)? (psm)
- Would upgrading (e.g., realignment, widening, improvement) of boundary/access roads be allowed? (psm)
- What would the effects of designation be on actions taken for natural disasters (i.e., fires, landslides [Thistle Slide], etc.)? (psm)
- How would sanitation and litter be controlled? (psm)
- How would fuel, trees, brush, etc., be dealt with? (psm)
- There is concern, especially where private property adjoins designated wilderness, that

such areas could act as uncontrolled sources for noxious weeds, rodents, etc. (psm)

- Is BLM able to manage those lands so as to protect natural values? If so, are the management resources, especially the budget, in place in order to implement that management practice? (lug)
- Would user fees be charged? (lug)
- Would designation result in higher taxes? (lug)

Other Resource Uses

- Could designated areas be improved (e.g., wildlife habitat improvements)? (psm)
- Would management of designated areas improve (permitting better use of rangeland and other resources)? (psm)
- Will the analysis consider topographic integrity with other agency wilderness and its effect on manageability? (psm)
- What effect would delays in designation have on resources/uses? (psm)
- Would surface occupancy leases be issued in wilderness areas? (psm)
- If predator control were not permitted, this would be detrimental to livestock and big game, especially sheep operations. (psm)
- If an area were not designated, there should be management safeguards to protect values such as wildlife habitat, watershed, and archaeological sites. (psm)
- Management conflicts must be real and substantiated before they are used as a basis for eliminating wilderness areas. (lug)
- Oil and gas leases which overlap wilderness areas would not automatically represent a manageability problem, unless the leaseholders are planning to go in and drill before expiration of the lease. (ind)

Interagency Consultation and Coordination

- There should be coordination between the various agencies (BLM, FS, and NPS), and wilderness designation should be considered in one package. Collectively, designation could become overwhelming in magnitude and could severely impact a single area or county. (psm)
- What would the impacts of wilderness designation from all proposals (BLM, FS, and NPS) be on a statewide basis? (psm)
- Would interagency land transfers or trades be made to improve continuity of WSAs? (psm)

SPECIFIC WSA ISSUES AND CONCERNS

Skull Rapids, Westwater Canyon WSA

SPECIFIC WSA ISSUES AND CONCERNS

This section lists issues and concerns identified by various groups for WSAs.

Behind the Rocks WSA

- The EIS should analyze sediment control in this WSA. (ga)
- The occurrence of the sensitive plant species *Lomatium latilobum* and *Cryptantha johnstonii* in or near this WSA should be considered in the decision-making process. (lug)
- The WSA encompasses the Moab oil and gas prospect. This prospect is a structural trap with rocks of Mississippian age and a very high potential for oil and gas as the main objective. (lug)
- Does this area have oil and gas potential? (ga)

Bridger Jack Mesa WSA

- The area has oil and gas leases; how will these be treated? (ga)
- Values present should be protected by designation as wilderness rather than receive Outstanding Natural Area status. (ind)
- The WSA barely meets the size criteria. (ga)
- Opportunities for solitude are limited due to the WSA's narrow configuration (1 X 10 miles), sparse vegetation, and imprints along the boundary. (ga)
- The isolated nature of the WSA gives it prime wilderness quality. The SSA conclusion that opportunities for solitude and recreation are less than outstanding is wrong. (ga)
- Primitive recreation would be limited in the WSA. (ga)
- The WSA is flat and lacks outstanding scenic values. (ga)
- The boundary for this WSA is a mystery. If the rules had been followed in the inventory, the Bridger Jack Mesa WSA would be bounded by the roads at the foot of the mesa. With the exception of a small uranium mine, the cliffs and talus slopes remain entirely natural. (ind)
- Contrary to the SSA conclusion that recreational use would diminish wilderness values, since the area has only two access points, recreational use could be managed to prevent overuse. (ind)

- Would designation recommendations consider adjacent NPS and FS wilderness proposals? Where there are adjoining proposed wilderness areas, would the size criteria (5,000 acres) be modified (e.g., areas bordering Zion National Park, Natural Bridges, New Mexico)? (psm)
- What would be the impact of nondesignation on adjoining proposed wilderness areas (e.g., Zion National Park)? (psm)
- If small WSAs bordering Zion National Park were not designated, how would their management be integrated with the Park? (psm)
- Will designation recommendations consider wilderness recommendations/designations in neighboring states? Are additional wilderness areas needed? There are more than enough opportunities for solitude in our National Parks. (psm)
- Wilderness designation would enhance the National Natural Landmark status of several areas. (ga)
- Proposed FS wilderness areas already include much (sufficient) outstanding high mountain terrain. (ind)
- Consider the effect of Project BOLD on wilderness inventory units. A major wilderness value may be located on a State section adjacent to the WSA, such as the arch on State land near Negro Bill Canyon. (ind)
- Coordination between BLM, NPS, FS, Utah State, and other states could create large continuous wilderness areas. The possibility of interagency management should be pursued. Interagency land transfers (especially with the State) should be pursued before determining WSA boundaries. (ind)
- All WSAs in the San Juan Resource Area are affected by State sections in some way, although manageability has not been cited as significant. Some mechanism should be developed to give naturalness boundaries to the WSAs after the State land problem is solved. This could be taken up in the EIS. (ind)

SPECIFIC WSA ISSUES AND CONCERNS

Bull Mountain WSA

- Because this WSA has a high erosion hazard and is an area that could receive erosion control measures, it should not be designated wilderness. (psm)
- The occurrence of the sensitive plant species *Erigeron cronquistii* in or near this WSA should be considered in the decision-making process. (lug)
- Mechanical vegetative manipulation in this WSA is considered mandatory for the continued existence of bison and mule deer. Designation would eliminate this possibility. (ga)
- The EIS should include a discussion of land use conflicts as a result of wilderness designation. (ga)

Burning Hills WSA

- The occurrence of the sensitive plant species *Penstemon atwoodii* in or near this WSA should be considered in the decision-making process. (lug)
- What would be the effect of designation on mining removal and transport of coal from leaseholds? (lug)
- Coal production would be extremely difficult and could not be extracted profitably in the near future. The lack of adequate transportation and cost of production should be considered. Would the wilderness values lost outweigh the benefits of coal development? (lug)
- Could coal resources be extracted by underground mining methods with access on the border or outside the WSA? (lug)
- A map showing the locations of leases within this WSA should be included in the EIS. (lug)
- Would wilderness designation be consistent with local and State land use planning in this WSA? (lug)
- How would BLM wilderness boundaries and acreages be changed, if needed? (lug)
- The SSA acknowledges coal resources are not immediately important, yet dismisses the wilderness alternative because it is in perpetuity. What Congress designates it could undesignate, but destruction of wilderness values could not be reversed. (lug)

- The SSA stated that lack of outstanding primitive recreation opportunity detracts from the area's wilderness quality. Cannot areas containing only outstanding solitude become wilderness? (lug)
- The brochure indicated that there are outstanding opportunities for solitude in about 45 percent of the WSA, while BLM's technical report (SSA) indicated relatively limited opportunities for outstanding solitude. This change inflates the area's importance as wilderness. (lug)
- The Glen Canyon NRA 1972 Enabling Act (Lloyd Act) directed a study of proposed road alignment within and adjacent to the recreation area. If a road were constructed, it could impact this WSA. (psm)

Butler Wash WSA

- This WSA has previous disturbance from oil and gas activity and mining. Existing oil and gas leases and mining claims make this area less desirable. (ga)
- What would the effect of wilderness designation be on private and State inholdings in Butler Wash? (ga)
- If the WSA were outstanding, it would have been included in Canyonlands National Park. (ga)

Canaan Mountain WSA

- Flood control development may be needed in Canaan Mountain WSA. Would these structures or improvements be preserved if the area were designated wilderness? (psm)
- Wilderness should not be designated where it could preclude water developments (i.e., reservoirs) and impede development in local communities. (psm)
- Private water rights are held on Maidenhair and Stateline springs (which have been improved) and on Cottonwood Spring (which has plans for improvement and a pipeline in the near future). (lug)
- The area offers outstanding scenery, views of Zion National Park, the Pink Cliffs, Markagunt Plateau, and the Arizona Strip. (ind)
- Water Canyon, Smithsonian Butte, Eagle Crag, the plateau summit, and surrounding lands need adequate protection. (ind)

- Potential water development for livestock grazing is an issue. (ga)
- Livestock grazing and range support activities should not be an issue in this WSA because Canaan Mountain borders Zion National Park. The full wilderness potential of this WSA should be retained. (ga)
- Cottonwood Canyon in the Cottonwood Allotment is used to trail livestock to and from the Goat Ranch Allotment. This trail is not shown on BLM maps of existing range improvements. The continued use of this trail under wilderness designation is a concern. (lug)
- The WSA has remarkable wilderness values and low known mineral or commercial values, but the boundaries need to be carefully refined. (lug)
- The WSA does qualify in terms of size, but size is not the only qualification. (psm)
- The impacts to solitude resulting from air routes over the WSA should be considered. (psm)
- Do outstanding opportunities exist in Cottonwood Canyon (the Draft SSA says not)? (lug)
- There is potential for boundary adjustment on the southwest to permit road improvement and flood control measures, plus land exchange of two sections of State land and a planned reservoir in the Arizona portion. (psm)
- Boundaries of this WSA should follow topographical features in the Arizona portion rather than from legal subdivisions. (psm)
- To facilitate management, boundaries should follow the rims rather than legal survey lines. (lug)
- The northern boundary, as drawn in the preliminary planning suitability recommendation, was drawn with regard to natural features which form a logical boundary. (lug)
- The EIS should discuss land use conflicts as a result of wilderness designation (especially around the perimeter and near private land holdings). (lug, ga)

Carcass Canyon WSA

- The Glen Canyon NRA 1972 Enabling Act (Lloyd Act) directed a study of proposed road alignment within and adjacent to the recreation area. If a road is constructed, it could impact this WSA. (psm)

- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, yet no acres were recommended for wilderness. (ind)

Cedar Mountain WSA

- Does this WSA meet wilderness criteria? (psm)
- How would wilderness values be affected by overflights (i.e., Air Force training, commercial air traffic) in this WSA? (psm)

Cheesebox Canyon WSA

- The WSA contains oil and gas leases and mining claims. Visual impacts of mining from outside the WSA are a conflict now. (ga)
- There are ten oil and gas leases, 38 mining claims and grazing permits in the WSA, plus mine dumps which can be seen from within the WSA. (ga)
- This WSA has a desert bighorn sheep population which would benefit from wilderness management. (ga)

- The area has valuable wood-cutting resources for Indian tribes and others in the area. (ga)
- The reasons stated for not recommending designation do not override the wilderness values. (ga)
- The WSA has been imprinted by mining and exploration activities and includes several miles of roads. (ga)
- Sounds from Highway U-95 can be heard within the WSA at times. (ga)
- Sights and sounds of traffic on Highway U-95 do not significantly affect opportunities for solitude. Sounds can seldom be heard in the canyons; traffic is distant enough to not detract from the feeling of solitude. (ind)
- Wilderness designation would protect White Canyon, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- What would the effect of wilderness designation be on private and State inholdings? (ga)
- In the inventory, 12,110 acres of the original Cheesebox Canyon inventory unit were deleted in possible violation of the inventory policy. This issue is now before the IBLA.

However, the SSA does not take note of this important fact. Instead, the BLM proceeds to study the remainder of the unit, which has been deprived of many miles of canyons which contain outstanding wilderness qualities. (ind)

Coal Canyon WSA

- How would watershed resources be affected by nondesignation? A dollar value should be given for resources which are protected and enhanced by wilderness in comparison to potential jobs and listed lost lease royalties. (lug)
- In the SSA, the analysis of impacts on energy and critical resources failed to quantify or state how there would be adverse impacts when the economic feasibility of development (meeting the prudent man test) is remote. The mere presence of pre-FLPMA oil and gas leases is not sufficient cause to eliminate the WSA. The analysis should indicate the need and potential for minerals. (lug)
- The analysis should consider mineral and other resources available outside the WSA and the effect of lost lease royalties on local socioeconomics. (lug)
- Do questionable low-to-medium oil and gas potential (f2) and moderate coal tonnage outweigh wilderness values? (lug)
- What criteria and systematic analysis were used to evaluate the relative values of competing resources? That must be answered and used consistently in all the SSAs. (lug)
- Would there actually be a problem of manageability with respect to pre-FLPMA oil and gas leases? (lug)
- The Book Cliffs roadless areas are the most important BLM-managed wildlife habitat in the State. Are these same roadless areas the most important oil/gas areas in the State? (lug)
- How would livestock grazing be impacted if this WSA were not designated wilderness? (lug)
- What would happen to permittees' forage if full-scale development were to take place? (lug)
- The compatibility between wilderness and the multiple-use concept should be discussed. (lug)
- Would wilderness designation be consistent with local and State land use planning? (lug)

SPECIFIC WSA ISSUES AND CONCERNS

- Cost/benefit analyses are needed to identify wilderness economic tradeoffs. (lug)
- What local economic effects would wilderness designation create? (lug)
- Maps and charts in the SSA are poorly defined and difficult to interpret. (lug)
- The Draft SSA failed to quantify statements but uses "numerous, high, low, lack of" etc. (lug)
- What assumptions were used for the SSA analysis? How was "No Action" incorporated into "No Wilderness?" (lug)
- Is it an analysis assumption in the SSA that Congressional designation could override specific management actions? (lug)
- Worst-case analysis was applied in a biased manner in the SSA: only 0.1 visitor day (VD) per acre is predicted, thereby discounting any increase in popularity of the region. (lug)
- The recreation opportunities discussion in the SSA does not use BLM's own Recreation Opportunity Spectrum (ROS). Descriptions are not experience oriented. (lug)

Cockscomb WSA

- The EIS should analyze potential water resource conflicts related to salinity, sediment control, and livestock grazing. (ga)
- Wilderness should not be designated where it could preclude water developments (i.e., reservoirs) and impede development in local communities. (psm)
- The analysis should address the commercial viability of extraction (including underground mining) of hydrocarbons and other minerals. Would equal or better opportunities exist outside the WSA? (lug)
- How would designation impact mining, removal, and transport of coal from leaseholds? (lug)
- Why did BLM recommend the Cockscomb Formation for protection as a geologic interpretive area? What are the geologic resources other than fossil claims? (lug)
- The SSA recommends 4,980 acres as unsuitable because of potential resource conflicts, although there are no coal leases in the WSA and it is "unlikely that any of the coal in the WSA is potentially developable." Is there any real/potential conflict? The same is true for oil and gas and mining claims; none of the WSA is favorable for the occurrence of economic uranium or other minerals, and the promise for oil/gas is low. (lug)

- It is senseless to recommend areas unsuitable because of resource conflicts that, according to the SSA, do not exist. (lug)
- The potential for discovery of energy or mineral resources is reasonably high. (lug)
- The analysis should consider coal transport corridors (identified in the Coal Development and Transportation Study) of equivalent importance to the coal reserves. (lug)
- Potential adjacent coal-unit train activity would impair wilderness characteristics in the WSA. (lug)
- A potential water impoundment for coal operation would partially cover a portion of this WSA.
- Once areas have been removed from the original WSA because of reasons that would disqualify the area for designation, there are less than 5,000 acres remaining. Size would disqualify this area for wilderness designation. All other normal considerations that are mandated as a part of the EIS must be adequately treated to the satisfaction of the Commission. (psm)
- Sights and sounds from coal transport routes would degrade wilderness values in this WSA. (lug)
- The Glen Canyon NRA 1972 Enabling Act (Lloyd Act) directed a study of proposed road alignment within and adjacent to the recreation area. If a road were constructed, it could impact this WSA. (psm)
- The SSA conclusion that 60 percent of the area offers outstanding opportunities for primitive recreation and 40 percent offers outstanding solitude is supported by sketchy justification. The SSA does not have a map showing these areas. (lug)
- The EIS should discuss land use conflicts as a result of wilderness designation. (lug)
- Cost/benefit analyses are needed to identify wilderness economic tradeoffs. (lug)
- How would local communities be involved in wilderness designation?

Cottonwood Canyon WSA

- Flood control development may be needed in Cottonwood Canyon WSA. Would these structures or improvements be preserved if the area were designated wilderness? (psm)
- Why delete Cottonwood Canyon when it meets all the criteria? (psm)

- Wilderness should not be designated where it could preclude water developments (i.e., reservoirs) and impede development in local communities. (psm)
- Once areas have been removed from the original WSA because of reasons that would disqualify the area for designation, there are less than 5,000 acres remaining. Size would disqualify this area for wilderness designation. All other normal considerations that are mandated as a part of the EIS must be adequately treated to the satisfaction of the Commission. (psm)
- This WSA is under the direct air traffic route of commercial airlines serving the St. George airport. Planes flying at a low altitude on approach to the airport degrade solitude in this WSA. (psm)

Cougar Mountain WSA

- Flood control development may be needed in Cougar Canyon. Would these structures or improvements be preserved if the area were designated wilderness? (psm)
- The occurrence of the sensitive plant species *Epilobium nevadense* in or near this WSA should be a factor in the decision-making process. (lug)
- Wilderness should not be designated where it could preclude water developments (i.e., reservoirs [headwaters of Beaver Dam Wash]) and impede development in local communities. (psm)
- Size is adequate in terms of WSA guidelines. Size that meets wilderness qualifications is much less than the recommended size. All other normal considerations that are mandated as a part of the EIS must be adequately treated to the satisfaction of the Commission. (psm)
- Were the naturalness criteria consistently applied? Portions of this WSA are believed to contain significant intrusions. (psm)
- The impact of air space use above the WSA for gunnery and bombing training by the U.S. Air Force should be addressed in the EIS. There would appear to be lack of solitude from these activities. (psm)

Sclerocactus wrightiae

Crack Canyon WSA

- The possible occurrence of the endangered plant species *Sclerocactus wrightiae* and occurrence of the sensitive plant species *Hymenoxys depressa* and *Thelypodopsis barneybi* in or near this WSA should be considered in the decision-making process. (lug)
- Uranium/vanadium potential exists, and the effect of wilderness designation on development of these important minerals should be carefully assessed. (ga)
- Wilderness designation would protect the Muddy River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)

Dark Canyon Complex ISA

- This ISA has a high erosion hazard and/or areas that could receive erosion control measures and should not be designated wilderness. (psm)
- The occurrence of the sensitive plant species *Erigeron kachinensis* in or near this WSA should be considered in the decision-making process. (lug)
- I am especially concerned about the bighorn sheep herd. Recreation use should be a second priority to preserving the bighorn sheep. The BLM deserves the most enthusiastic support for this recommendation. (ind)

- The ISA's national significance is indicated by its selection as an important segment of the "Hike a Nation" transcontinental backpacking route. (ind)

Death Ridge WSA

- The occurrence of the sensitive plant species *Penstemon atwoodii* and *Xylorhiza cronquistii* in or near this WSA should be considered in the decision-making process. (lug)
- Can the coal beneath the Kaiparowits Plateau be extracted and transported from the region profitably? Are better opportunities for coal development available on other lands? (lug)
- Why are pre- and post-FLPMA leases incompatible with wilderness management when nonimpairment criteria can be applied to both (10th Circuit Court Rocky Mountain Oil and Gas Association [RMOGA] decision) and development is only a speculative assumption? (lug)
- Identified potential transportation corridors should have weight equivalent to the value of the coal reserves. (lug)
- Coal extraction is economically questionable and environmentally controversial. Would oil and gas extraction be economically feasible? Would extraction be done under nonimpairment criteria? (lug)
- If mineral resources affect wilderness suitability, there should be a detailed explanation of how decisions were made and differing values weighed. (lug)
- The SSA should provide a map showing the locations of oil, gas, and coal leases. (lug)
- Could underground coal mining methods be used? (lug)
- Post inventory cherrystemming of roads and gerrymandering of WSA boundaries and acreages is not allowed. (lug)
- Land use conflicts as a result of wilderness designation should be discussed. (lug)
- Would wilderness designation be consistent with local and State land use planning? (lug)
- What local economic effects would wilderness designation create? (lug)
- Wilderness designation should include a national as well as a local perspective. (lug)
- The SSA indicates that about 50 percent of the area possesses outstanding opportunities for solitude, yet the technical report (SSA) indicates only about 600 acres (1 percent). (lug)

- The SSA indicates only the peninsula between Right Hand Collet and Escalante Canyon has outstanding solitude opportunities; yet the BLM found in the inventory that the area met WSA standards; therefore, it must possess outstanding opportunities. (lug)
- The SSA found 50 percent of the area possessed outstanding opportunities for solitude yet indicates wilderness values are less valuable or unimportant; at what percent are values important? (lug)

Deep Creek WSA (Near Zions National Park)

- Flood control development may be needed in Deep Creek WSA. Would these structures or improvements be preserved if the area were designated wilderness? (psm)
- Wilderness should not be designated where it could preclude water developments (i.e., reservoirs) and impede development in local communities. (psm)
- Based on size, this area does not qualify for further consideration as a wilderness area. All other normal considerations mandated as a part of the EIS must be adequately treated to the satisfaction of the Commission. (psm)
- Sonic booms occur in the Deep Creek WSA. (psm)

Deep Creek Mountains WSA

- The occurrence of the sensitive plant species *Sclerocactus pubispinus* in or near this WSA should be considered in the decision-making process. (lug)
- Appropriate measures for operation and maintenance of present water diversions and conveyance facilities and for ensuring an adequate water supply for livestock must be permitted. Because of the scarcity of water in the West Desert, it would be highly desirable to provide for future development of the springs in the northern portions of the WSA. (ga)
- Would wilderness allow chemical treatment of water and stream stabilization and enhancement? Chemical treatment of streams is necessary so that the native fish species, Bonneville cutthroat trout, can be reintroduced. (psm)
- This WSA has locatable mineral potential (gold [Au], silver [Ag], lead [Pb], zinc [Zn], tungsten [W], calcium [Ca], antimony [Sb], mercury [Hg], uranium [U]). (ga)
- Wilderness could be compatible with mining in the Deep Creek Mountains. (ind)

SPECIFIC WSA ISSUES AND CONCERNS

- Bighorn sheep have been released in this area, and wilderness designation should enhance their chance for establishment. No conflicts exist since water is sufficiently available, and deer winter range inside the WSA does not lend itself to rehabilitation. (ga)
- The Deep Creek Mountains WSA above 7,000 feet could be designated. This would have less impact on water development and forage improvement. (ind)
- Would wilderness designation prohibit critical wildlife habitat (summering/wintering range) modification and management techniques (e.g., water development and chemical treatment for the bighorn sheep transplant proposed by the Utah Division of Wildlife Resources [UDWR])? (psm)
- Wilderness designation would protect Birch Creek and Trout Creek, which are Nationwide River Inventory segments with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- How would sonic booms from the Air Force training area impact wilderness values in the Deep Creek Mountains? (psm)
- How would wilderness values be affected by overflights (i.e., Air Force training, commercial air traffic) in this WSA? (psm)
- The WSA has unique and scenic landforms. (ind)
- This WSA is bordered with irrigation water, grazing rights, and private property. (lug)
- Would this BLM wilderness unit be consistent with other adjoining Federal lands? (ga)
- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, and yet no acres were recommended for wilderness. (ind)

Desolation Canyon WSA

- The occurrence of the sensitive plant species *Gaillardia flava* in or near this WSA should be considered in the decision-making process. (lug)
- Would designation preclude water development for tar sand in upper Desolation Canyon? (psm)
- How would water development for tar sand projects impact wilderness values in Desolation Canyon? (psm)

- Utah has a significant amount of unallocated water in its apportionment of the Colorado River supply, and one of the few areas physically available is the lower Green River. Proposed uses are to supply municipal and industrial water needs to the lower Price-Green River corridor. Wilderness designation would needlessly restrict future critical water developments. (ga)
- Salinity control activities on the lower Price River, flood control on the lower Green River, additional water storage potential on the Green River, and Ute Indian claims for water may require diversion facilities on the Green River. (ga)
- Most of the known geologic structures (KGS) and leases in the Jack Creek drainage could be managed to protect wilderness (e.g., directional oil drilling, etc.). (lug)
- About 15,000 acres in the Little Park Wash area were recommended unsuitable, yet the coal reserves occur on only about 2,900 of the western-most acres and have a low probability of development. The amended SSA changed the 2,900 to 8,000, although the coal field is outside the additional area studied. Why? (lug)
- The area has important oil and gas potential. (ga)
- What impacts, both beneficial and adverse, would wilderness designation have on Rocky Mountain bighorn sheep? (ga)
- Much of the WSA along the Green River provides critically valued winter range for mule deer. How would wilderness designation impact this range? (ga)
- The figures representing the number of acres for some grazing allotments inside the WSA have been decreased in the amended SSA. Is this a result of minor (unmentioned) boundary adjustments in the WSA or just a rounding-off of the acreage? (lug)
- Wilderness designation would enhance the National Historic Landmark status of Desolation Canyon. (ga)
- Would designation of Desolation Canyon WSA affect present recreational use (e.g., river running)? (psm)
- Wilderness designation would protect the Green River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- The exclusion of the 430-acre parcel in Rattlesnake Canyon is unjustified. Several factors

make development, which could impact the wilderness quality of the whole drainage, uncertain. (lug)

- There is concern regarding areas which were excluded from the recommendation to improve manageability: Little Pearl Wash, Jack Creek, and a small parcel near Rattlesnake Canyon. (lug)
- The boundary should have been extended to include the inventory boundary in the Horse Bench, Rock House Canyon, Big Swale, Xmas Canyon, Sulnar Mesa, Tusher Canyon, and Rattlesnake Canyon areas. (lug)
- What impact on designation recommendations would inadvertently impairing developments (i.e., road construction/improvements) have in Desolation Canyon? (psm)

Dirty Devil WSA

- Soil erosion control issues should be analyzed in the EIS. (ga)
- This WSA contains historic sites associated with the Wild Bunch which should be protected by wilderness designation. (ind)
- Wilderness designation would protect Dirty Devil River, which is a Nationwide Rivers Inventory segment with potential for study and for addition to the National Wild and Scenic Rivers System. (ga)
- Were the naturalness criteria consistently applied? Portions of this WSA are believed to contain significant intrusions. (psm)
- Anasazi ruins, beautiful hanging gardens, spring pouroffs, and solitude enhance the wilderness values and experiences in the WSA. (ind)

Escalante Canyons Tract 5 ISA

- North Escalante Canyon was not recommended, so the archaeological values would not be protected. (psm)
- The area probably has wilderness qualities, but it cannot stand on its own due to its small size. (ga)
- Why delete Escalante Canyon when it meets all the criteria? (psm)
- The best alternative is to include Escalante Canyon Tract 5 ISA in the Glen Canyon NRA. Small boundary adjustments are allowed under the law creating the Glen Canyon NRA, and adding this area under the terms of this law has been discussed. If this cannot be done, this area must be designated as wilderness. (ind)

- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, yet no acres were recommended for wilderness. (ind)
- Would BLM wilderness units be consistent with other adjoining Federal land use? (ga)

Fiddler Butte WSA

- The Bailey-Kuchler potential natural vegetation map should not be used to describe vegetation diversity for this WSA. (lug)
- Is Soil-Vegetation Inventory Method (SVIM) data available for this area? SVIM could be used to describe vegetation types not accounted for by Bailey-Kuchler's map. (lug)
- The occurrence of the sensitive plant species *Astragalus monumentalis* in or near this WSA should be considered in the decision-making process. (lug)
- Tar sand potential for development should be "submarginal" not "paramarginal" in view of cost estimates. Development is unlikely. Would it be economic? (lug)
- Why were the Red Benches along the Glen Canyon NRA excluded from the recommendation? (lug)
- The road to the mining claim southwest of The Block is drawn incorrectly on the map in the SSA. (lug)
- The BLM has allowed drilling operations which violate FLPMA. (lug)
- The area has moderate hydrocarbon (oil and gas) potential plus potential for carbon dioxide; therefore, it should not be designated as wilderness. (lug)
- What is the effect of wilderness designation on oil, gas, and tar sand development? (ga)
- Wilderness designation would protect the Dirty Devil River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- The Block should not be recommended suitable because it is in the Tar Sand Triangle, and intrusions and sounds associated with development would degrade wilderness values. Also, the Block may not contain the minimum 5,000 suitable acres. (lug)

- Interim management mining intrusions occurred without a mining plan or Environmental Assessment (EA). What part of the WSA is now found unsuitable for designation? (lug)
- The BLM ignored wilderness values in that portion of the remanded area that was not recommended suitable. (lug)
- The portion in Hatch Canyon recommended as suitable in the Draft SSA might not offer solitude if tar sand development occurred. (lug)
- Would wilderness designation be consistent with local and State land use planning? (lug)
- Only 5,000 acres of the 40,000-acre remanded area were recommended suitable in the revised SSA. Could not the BLM have made the same mistake as in the original SSA when 24,200 acres, now classed as suitable, were initially rejected? (lug)
- The SSA indicated the WSA has many canyons for topographic screening yet opportunities for solitude were listed as moderate. Why? What is high, medium, or low? (lug)
- The Draft SSA recommended only a small area suitable. Why? The remainder of the WSA possessed mandatory characteristics and no significant resource conflicts. (lug)
- The preliminary planning recommendation on the remanded area is considered correct except for the areas dropped, which border proposed wilderness in the NRA. (lug)

Fifty Mile Mountain WSA

- The vast majority of the WSA, almost all of which is outside the Known Recoverable Coal Resource Area (KRCRA), was recommended unsuitable, including some of the best parts of the WSA (Rogers Canyon, Little Valley, and Navajo Canyon). To say that minor quantities of speculative resources outweigh wilderness values is wrong. (lug)
- Interim management is too restrictive, creates conflicts, and excludes local input to decisions (e.g., Kaiparowits coal field). (psm)
- This WSA contains archaeological sites that should be protected by wilderness designation. (ind)
- The area offers exceptional wilderness qualities and abundant opportunity for solitude, recreation, and scenery. (ind)
- Land use conflicts as a result of wilderness designation should be recognized and the area partialled or not designated. (ga)

Fish Creek Canyon WSA

- What would the effect of wilderness designation be on oil and gas development and oil and gas leases? (ga)
- The WSA is a valuable wood-gathering area for neighboring Indian tribes. (ga)
- There are portions of three cattle grazing allotments in the area. Wilderness designation would eliminate any possible range improvements. (ga)
- Several miles of roads run through this area which would be considered imprints. Several other roads are cherrystemmed. These should be recognized, and wilderness values lowered. (ga)
- Sounds from Highway U-95 can be heard in the WSA and would disrupt wilderness values. (ga)
- The Dry Wash area (1,500 acres said to lack solitude) offers exceptional opportunity to find a secluded spot because it is secluded and seldom visited; also, the Comb Wash road is seldom traveled. (ind)
- Would wilderness designation be consistent with local and State land use planning? (ga)
- What would the effect of wilderness designation be on private and State inholdings? (ga)
- The main reason for eliminating 11,220 acres as unsuitable seems to be the fact that "The WSA boundary on this portion followed legal subdivisions and was not identifiable on the ground." If this is a problem, then only the BLM is to blame. Organic Act Directives (OAD) 78-61, Change 3, restricts the use of legal subdivisions in drawing WSA boundaries to "special cases." A bit more than 3 miles of the boundary in question follows State land, but if the rest were a special case, it is hard to see why. Boundaries should follow ground features. They should be adjusted outward, in this case, to the nearby roads. (ind)

Fish Springs WSA

- Would wilderness designation prohibit critical wildlife habitat (summering/wintering range) modification and management techniques (e.g., water development and chemical treatment) and the Fish Springs bighorn sheep transplant proposed by UDWR? (psm)
- The EIS should analyze potential conflicts with bighorn sheep transplants due to the need for artificial water guzzlers if the transplant is done. (ga)

SPECIFIC WSA ISSUES AND CONCERNS

- Wilderness boundaries should be redrawn (higher up) so that livestock management is not encumbered by wilderness. (lug)

Floy Canyon WSA

- The partial alternative excludes too much area. The coal resources in the northern part could be mined by underground methods. (lug)
- The favorability for coal (f3—medium to high) and oil and gas (f2—low to medium) is outweighed by the wilderness values. (lug)
- The analysis should consider minerals and other resources outside the WSA and the impact of lost lease royalties on local socio-economics. (lug)
- The SSA maintains that pre-FLPMA leases with valid existing rights could impair wilderness values and create manageability problems. However, the recommended partial alternative includes the majority of those leases. (lug)
- The WSA possesses good possibility for limited oil and gas production; therefore, it should be recommended as unsuitable. (lug)
- Mineral resources, particularly oil and gas, are overplayed and wildlife and wilderness values underplayed. (lug)
- Are the roadless areas in the Book Cliffs the best producers of oil and gas in Utah? They are the best wildlife habitat. (lug)
- Use of lost lease royalties to justify an unsuitable recommendation is an argument for not designating wilderness anywhere. (lug)
- What is the oil, gas, coal, and uranium potential and what is the effect of wilderness designation on the development of oil and gas leases? (ga)
- What impact on designation recommendations would inadvertently impairing developments (i.e., road construction/improvements) have in Floy Canyon (right fork of Tusher Canyon)? (psm)
- Land use conflicts resulting from wilderness designation are very important in this WSA. (ga, lug)
- Cost/benefit analyses are needed to identify wilderness economic trade-offs. (lug)
- What local economic effects would wilderness designation create? (lug)
- The BLM notes in the SSA that wildlife, particularly elk, bear, and cougar, is found in the WSA because of the lack of human

impacts. However, the SSA notes impacts to wildlife habitat would be mitigated. The mineral resources, particularly oil and gas, are overplayed while the wildlife and wilderness values are underplayed. (lug)

- If motorized travel were prohibited, why does the SSA state that travel on ways would affect solitude? (lug)

Flume Canyon WSA

- In the SSA, the analysis of impacts on energy and critical resources failed to quantify or state how there would be adverse impacts when the economic feasibility of development (meeting the prudent man test) is remote. The mere presence of pre-FLPMA oil and gas leases is not sufficient cause to eliminate the WSA. The analysis should indicate the future and potential need for minerals. (lug)
- The analysis should consider mineral and other resources available outside the WSA and the effect of lost lease royalties on local socioeconomics. (lug)
- Do questionable low-to-medium oil and gas potential (f2) and moderate coal tonnage outweigh wilderness values? (lug)
- What criteria and systematic analysis were used to evaluate the relative values of competing resources? These factors must be applied consistently in all the SSAs. (lug)
- Would there actually be a problem of manageability with respect to pre-FLPMA oil and gas leases? (lug)
- Many impacts could occur if this WSA were not designated wilderness. What would happen to permittees forage if full-scale development were to take place? What about watershed? (lug)
- How would permittees be affected by non-wilderness? (lug)
- Cost/benefit analyses are needed to identify wilderness economic trade-offs. (lug)
- What local economic effects would wilderness designation create? (lug)
- Would wilderness designation be consistent with local and State land use planning? (lug)
- Maps and charts in the SSA are poorly defined and difficult to interpret. (lug)
- Justification given for the "No Wilderness" recommendation in the SSA is that wilderness values are outweighed by resource values, particularly oil/gas. How was this determined?

The criteria and systematic approach used to arrive at this decision must be answered consistently for all the SSA evaluations. (lug)

- The Draft SSA failed to quantify statements but uses "numerous, high, low, lack of" etc. (lug)
- What assumptions were used for analysis in the SSA? How was "No Action" incorporated into "No Wilderness?" (lug)
- Is it an analysis assumption that Congressional designation could override specific management actions? (lug)
- Worst-case analysis in the SSA was applied in a biased manner. Because only 0.1 VD per acre is predicted, any increase in popularity of the region was discounted. (lug)
- The recreation opportunities discussion in the SSA did not use BLM's own ROS. Descriptions are not experience oriented. (lug)

French Spring-Happy Canyon WSA

- There are significant intrusions in and around the area recommended suitable in the Draft SSA (e.g., the airstrip and road in Happy Canyon). (lug)
- The WSA possesses tenuous wilderness potential and should not be designated. The Dirty Devil and Horseshoe Canyon (south), which have definite wilderness characteristics, should be designated. (lug)
- The major conflict with the area recommended suitable in the Draft SSA is that a portion thereof is located in the Tar Sand Triangle and thus overlies substantial hydrocarbon resources. (lug)

Grand Gulch Complex ISA

- This WSA has high erosion hazard and areas that could receive erosion control measures and, therefore, should not be designated wilderness. (psm)
- What is the effect of wilderness designation on potential oil and gas development and oil and gas leases? (ga)
- Parcels of the WSA have potential for vegetation manipulation for mule deer winter range. Total designation would prevent manipulation. (ga)
- The canyon rims and mesa areas are valuable wood-gathering areas for neighboring tribes. (ga)

- This WSA contains archaeological sites that should be protected by wilderness designation. (ind)
- Grand Gulch, Slickhorn, and John's Canyon have outstanding wilderness characteristics, abundant opportunities for solitude and recreation, and no intrusions or resource conflicts. (ind)
- There are several roads and other cherry-stemmed roads in the area which show man's imprint. (ga)
- There are stock water ponds and range improvements in this WSA which show man's imprint. (ga)
- Sounds from Highway U-263 can be heard in many parts of the area. (ga)
- Would wilderness designation be consistent with local and State land use planning? (ga)

- How would wilderness designation impact private and State inholdings? (ga)
- The boundary on the western side of Grand Gulch follows section lines. Any wilderness proposal to Congress ought to have boundaries on roads or other identifiable ground features. (ind)

Horseshoe Canyon WSA

- Soil and erosion control issues should be analyzed in the EIS. (ga)
- Does the area have important oil and gas potential? (ga)
- Wilderness designation would protect Green River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)

Indian Creek WSA

- Does this area have important oil and gas leases? (ga)
- There are "two grazing permits in this area." (ga)
- How were the boundary lines for this WSA established? The boundary, excluding where it joins Canyonlands National Park and two adjacent State sections, follows legal subdivisions for a total of 8 miles. About one half mile of Indian Creek Canyon is left out for no apparent reason. The boundary as it stands is not an identifiable ground feature, and should be adjusted outward until it is. (ind)
- Because of the narrow configuration (1 ½ to 3 ½ by 5 ½ miles), solitude would be difficult. (ga)
- The WSA is adjacent to Canyonlands National Park, which has similar characteristics. If this WSA were outstanding, it would have been included in the Park. (ga)

Jack Canyon WSA

- Post-FLPMA oil and gas exploration activities have degraded wilderness values; this degradation has been used to exclude a portion of the WSA from a suitable recommendation. (lug)
- The portion of Jack Canyon WSA adjacent to Desolation Canyon WSA should be recommended suitable for designation. Slant drilling could be used to preserve wilderness character. (lug)

- The number of acres for some grazing allotments inside the WSA has been decreased in the amended SSA. Is this a result of minor (unmentioned) boundary adjustments in the WSA or just a rounding-off of the acreage? (lug)

LaVerkin Creek WSA

- Flood control development may be needed in this WSA. Would these structures or improvements be preserved if the area were designated wilderness? (psm)
- Wilderness should not be designated where it could preclude water developments (i.e., reservoirs) and impede development in local communities. (psm)
- Based on size, this area does not qualify for further consideration as a wilderness area. All other normal considerations mandated as a part of the EIS must be adequately treated to the satisfaction of the Commission. (psm)
- Would BLM wilderness areas be consistent with other adjoining Federal land use plans? (ga)
- Apparently there were irrational deletions in all or part of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, and yet no acres were recommended for wilderness. (ind)

Little Rockies WSA

- The EIS should analyze needed soil and erosion control activities which could be in conflict with wilderness. (ga)
- Does this area have significant uranium potential? (ga)

Mancos Mesa WSA

- Post-FLPMA oil and gas exploration has impaired a portion of the WSA; this degradation is now being used to recommend that portion unsuitable for wilderness designation. (lug)
- This WSA is located roughly on-trend with existing oil and gas production to the southeast. This production is from the Pennsylvanian Hermosa Group, which is subdivided into the Pinkerton Trail, Paradox, and Honaker Trail formations. Oil and gas production appears to be related to a carbonate shelf environment

SPECIFIC WSA ISSUES AND CONCERNS

which has interbedded algal mounds and organic shales. The apparent source rock-reservoir relationship in the Mancos Mesa area, however, is not supported by chemical analysis for total organic carbon. (lug)

- This WSA is also prospective for carbon dioxide in the Permian Cedar Mesa and Mississippian Leadville formations. While carbon dioxide in itself is not a fuel resource, it is used extensively in enhanced oil recovery systems. (lug)
- BLM determined wilderness values were high and post-FLPMA mineral exploration were nonimpairing; therefore, the area must be recommended suitable. (lug)
- The WSA boundaries are grossly wrong. To the south, it is a full day's hike to the boundary from any major intrusion. The boundary in Red Canyon is ½ mile up the cliff and leaves out much natural area. The north wall of Moki Canyon is included, but the south wall is not. Large, natural, and controversial areas which contain mining claims (some of which are owned by county commissioners) were excluded. (lug)
- Apparently the BLM allowed roads to be constructed in an area where rehabilitation was not possible. As a result, 5,320 acres were dropped for lack of naturalness. This violates Section 603 of FLPMA and should not be used to eliminate any acreage from consideration. (ind)
- The important opportunities for wilderness recreation present are indicated by the BLM proposal to create a primitive area in much of the present WSA. (ind)

Mexican Mountain WSA

- The occurrence of the sensitive plant species *Cryptantha johnstonii*, *Psoralea polycarpa* var. *jonesii* and *Hymenoxys depressa* in or near this WSA should be considered in the decision-making process. (lug)
- Wilderness designation would protect San Rafael River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)

Mill Creek Canyon WSA

- Pre-FLPMA leases should not be cited as a management problem since they will all expire in 1984. (lug)

- Potash and uranium potentials are unimportant considerations, given the availability of other deposits and recognized wilderness values. (lug)
- The existing closure of 720 acres to mineral leasing (RMP decision) is inadequate to protect the area from disturbance. (lug)
- The management of mineral leases on State land to be exchanged should not be cited as a management problem since the legislation has not been passed. (lug)
- The BLM is incorrect in concluding the WSA has a moderate potential for the discovery of oil and gas. (lug)
- The Non-wilderness Recommendation decision specified in the SSA is wrong. Conflict of interest of the district wilderness coordinator is an important unresolved issue. The actual reason BLM opposes the wilderness recommendation for Mill Creek does not appear in the SSA. (The SSA contains arguments to support its untenable position.) For example, management of wilderness is found by the BLM to "be difficult due to lack of cultural or physiographic features." Similarly, management of ORVs is cited as a reason for nondesignation, but, mysteriously, this would not pose a problem under the other protection designation proposed in the SSA. (lug)
- The Draft SSA was distorted, depreciated wilderness values, exaggerated resource conflicts, and had erroneous legal references. (lug)
- The Draft SSA failed to mention the fantastic spires and hoodoos in upper Rill Creek and Burkholder Draw, and the rare outcrops of the Moab Member of the Entrada Formation, which offer outstanding opportunities for solitude and primitive recreation. (lug)
- Proper study would have revealed that wilderness values "override" mineral potential. (lug)

Moquith Mountain WSA

- The occurrence of the sensitive plant species *Asclepias welshii*, *Astragalus striatiflorus* and *Astragalus ampullarius* in or near this WSA should be considered in the decision-making process. (lug)
- Land use conflicts as a result of wilderness designation should be discussed. (lug)

Mt. Ellen-Blue Hills WSA

- The occurrence of the sensitive plant species *Astragalus henrimontanensis* in or near this WSA should be considered in the decision-making process. (lug)
- There is a need for considerable mechanical vegetation manipulation in this WSA to benefit bison and mule deer herds. The EIS should analyze potential conflicts with these needs and identify a possible resolution of the conflict. (ga)
- Land use conflicts as a result of wilderness designation is a major issue. (ga)

Mt. Hillers WSA

- The occurrence of the sensitive plant species *Astragalus henrimontanensis* in or near this WSA should be considered in the decision-making process. (lug)
- This area is uniquely suitable for water yield improvement through weather modification. (ga)
- The area has considerable uranium potential. This development would conflict with wilderness designation. (ga)
- There is a need for considerable mechanical vegetation manipulation to benefit bison and mule deer herds. (ga)

Mt. Pennell WSA

- The occurrence of the sensitive plant species *Astragalus henrimontanensis* in or near this WSA should be considered in the decision-making process. (lug)
- Apparently there were irrational deletions of all or part of the WSAs and ISAs. After review of SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, yet no acres were recommended for wilderness. (ind)

Mud Springs WSA

- This WSA has a high erosion hazard and areas that could receive erosion control measures, and should not be designated wilderness. (psm)

Muddy Creek WSA

- Uranium/vanadium potential and development would affect wilderness values and potential designation. (ga)
- The EIS should discuss land use conflicts as a result of wilderness designation. (lug)

Mule Canyon WSA

- This WSA has a high erosion hazard and areas that could receive erosion control measures, and should not be designated wilderness. (psm)
- Does this area have oil and gas leases and mining claims significant enough to be important mineral resources? (ga)
- There is one grazing allotment in the area. (ga)
- Would wilderness designation be consistent with local and State land use planning? (ga)
- The small size of the area makes the opportunity for solitude very limited. (ga)
- Dense tree cover cuts the view of U-95 in the 800-acre area which was deleted because opportunities for solitude were questioned. (ind)
- Sounds from U-95 can be heard in the WSA. (ga)
- Arch Canyon, under appeal to the IBLA, is adjacent to Mule Canyon WSA. The two areas should be considered together, with the Texas Flat road cherrystemmed, as it should have been in the inventory. (ind)
- The SSA rationale for excluding this WSA was not justified, considering the high quality wilderness and archaeological values present. (ga)
- The SSA states the area could be better used for activities other than primitive forms of recreation. However, on the next page, it states that Mule Canyon is quite inaccessible to vehicles. What kind of recreation is contemplated? (ind)
- The SSA indicates solitude would decrease with increasing recreational use. This ignores management and would be a problem only if an increase in visitors did develop (past use has been slight). (ind)

Negro Bill Canyon WSA

- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping

document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, yet no acres were recommended for wilderness. (ind)

- Solitude and recreation opportunities are outstanding. Once one hikes several thousand feet upstream up the mouth, the area is nearly pristine, and a tributary canyon contains the world's fourth largest arch. (ind)

North Escalante Canyons/The Gulch ISA

- There should be a corridor wide enough for access roads and pipelines for development of the Circle Cliffs Special Tar Sand Area (STSA) between the Steep Creek WSA and North Escalante Canyons/The Gulch ISA. (lug)
- Wilderness designation would protect the Escalante River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- The area is rich in scenic treasures (Phipps Arch, Bowington Arch, Maverick Natural

Bridge, Anasazi ruins and pictographs, and the Escalante River Canyon). (ind)

- Wilderness designation of this ISA should include the main canyon, its tributaries and the benches and mesas between them, plus sufficient acreage on the west side of the river to guarantee the preservation of the wilderness character of this area. (ind)
- The existing natural boundaries of the ISA do not provide sufficient protection of its wilderness resources. Much more benchland and mesa area of the rim country must be included. (ind)
- Why is this ISA not recommended? It has valuable use as survival course area. Uranium conflicts do not exist. (psm)
- The Draft SSA correctly recommends exclusion of that portion of the WSA which is in the Circle Cliffs STSA; this portion has intrusions (roads and diggings), and designation would conflict with tar sand development. (lug)
- The entire 119,300 acres of this WSA are endorsed for designation. The deletions (Partial Alternative) noted on the scoping

Durfee Mesa, North Escalante Canyons/The Gulch ISA

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brochure map approach too closely to the river. (Alternative boundaries shown on a map were submitted but are not reproduced here.) (ind)

North Fork Virgin River WSA

- Wilderness designation would protect North Fork Virgin River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, yet no acres were recommended for wilderness. (ind)
- How would BLM wilderness areas be consistent with other adjoining Federal lands? (ga)

North Stansbury Mountains WSA

- Development of public water supplies could conflict with this WSA. (ga)
- The area has locatable mineral potential (Pb, Zn, Ag, copper [Cu], Hg), and development of these would conflict with wilderness values. (ga)
- Wilderness could be compatible with mining in the North Stansbury Mountains. (ind)
- Birdlife is abundant in this WSA and should be protected. (ind)
- Altitudes above 7,000 feet in this WSA could be designated. This would have less impact on water development and forage improvement. (ind)
- How would wilderness values be affected by overflights (i.e., Air Force training, commercial air traffic) in this WSA? (psm)
- The WSA provides unique and scenic landforms. (ind)
- The mountains form a scenic green island of diverse vegetation types in the desolate West Desert. It has solitude, naturalness, and wilderness experiences to be treasured. (ind)
- Should North Stansbury Mountains WSA be designated if the FS area is not designated? (psm)
- The compatibility of the Wilderness Act with other environmental acts (e.g., Clean Air, Water, Noise, etc.) should be analyzed in the north end of Stansbury Mountains. (psm)

Notch Peak WSA

- The occurrence of the sensitive plant species *Cryptantha compacta* in or near this WSA should be considered in the decision-making process. (lug)
- This area has strategic mineral potential. (ga)
- The EIS should carefully analyze potential conflicts with livestock operations in this WSA. (ga)

Orderville Canyon WSA

- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, yet no acres were recommended for wilderness. (ind)
- How would BLM wilderness areas be consistent with other adjoining Federal lands? (ga)

Paria-Hackberry WSA

- There are serious water resource problems in this WSA and concern related to salinity and sediment control. (ga)
- This area has valuable uranium potential. (ga)
- To maintain a viable deer population in this area, considerable range rehabilitation and water development are necessary. Water and land treatment will also be needed to satisfy livestock grazing demands when coal and other development takes place, even if it occurs in the distant future. (ga)
- Developments for livestock grazing activities could conflict with wilderness designation in this WSA. (ga)
- The conflict with ORV use along the portion of the Paria River eligible for inclusion in the National Wild and Scenic Rivers system should be resolved in favor of wilderness. (lug)
- The description of recreational opportunities is inadequate. It fails to reflect that opportunities are complemented by those in the Paria-Hackberry WSA, one powerline corridor away. (lug)
- The remand decision found outstanding opportunities for photography, yet the SSA does not mention photography in the recreation section. What does "optional scenic values" mean? (lug)
- The beautiful area around the White Cliffs deserves protection from ORV intrusions. (ind)

- The Glen Canyon NRA 1972 Enabling Act (Lloyd Act) directed a study of proposed road alignment within and adjacent to the recreation area. If a road were constructed, it could impact this WSA. (psm)
- Land use conflicts would result from wilderness designation. (lug, ga)

Parunuweap Canyon WSA

- The occurrence of the sensitive plant species *Erigeron sionis* in or near this WSA should be a factor in the decision-making process. (lug)
- Potential water development for livestock grazing is a concern which should be analyzed in the EIS. (ga)
- Why delete this WSA when it meets all the criteria? (psm)
- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, yet no acres were recommended for wilderness. (ind)
- The SSA gives little reason for excluding portions of the north and southeast portions of the WSA. A larger partial alternative, including all of the WSA, except a part of the cove where the four-wheel drive roads are located, should be analyzed in the EIS. (ga)

Phipps-Death Hollow ISA

- The occurrence of the sensitive plant species *Astragalus barnebyi* in or near this WSA should be considered in the decision-making process. (lug)
- Carbon dioxide development would conflict with wilderness values. (ga)
- Wilderness designation would protect headwaters of the Escalante River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- This WSA contains archaeological sites that should be protected by wilderness designation. (ind)
- The Escalante Canyons, with Escalante Natural Bridge, and Sids Canyon, with glens and waterfalls, are the crown jewel of wilderness resources in Utah. (ind)
- This ISA satisfies every criteria for wilderness; all 42,731 acres should be designated. (ind)

- There should be no deletions along the south boundary of this ISA. Pulling back the boundary toward the rim of the main canyon invites the construction of pullouts and overlooks that would severely impact the wilderness area. (ind)
- This ISA should be designated because it is contiguous with FS wilderness proposed area. (psm)
- No further development should be allowed in this ISA. (psm)

Red Mountain WSA

- Flood control development may be needed in this WSA. Would these structures or improvements be preserved if the area were designated wilderness? (psm)
- Some flood control development has already been done at the base of the cliffs of this WSA and may be within the WSA at the present time. (psm)
- Wilderness should not be designated where it could preclude water developments (i.e., reservoirs) and impede development in local communities (Town of Ivins and others). (psm)
- Do roads and towns near this WSA detract from the wilderness values (solitude) of the area? (psm)
- Even though there may be in excess of 5,000 acres identified in the preliminary study that could qualify for designation, other concerns have not been addressed or adequately addressed at this point. The total acreage now qualifying could be reduced during further study. All other normal considerations mandated as a part of the EIS must be adequately addressed to the satisfaction of the Commission. (psm)
- The EIS should discuss the impacts to solitude resulting from air traffic routes above this WSA. (psm)
- Apparently there were irrational deletions in all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, and yet no acres were recommended for wilderness. (ind)

Road Canyon WSA

- What is the effect of wilderness designation on oil and gas leases and development and mining claims? (ga)

- The WSA is a valuable wood-gathering area for Indians and others. There were 323 free-use firewood permits issued in 1981. (ga)
- There are portions of four grazing permits within the area, with 22 existing improvements and five proposed improvements. (ga)
- There are several miles of roads, including 7 miles of cherrystemmed boundary roads. (ga)
- Human imprints are of minor impact and substantially unnoticeable, yet are used as rationale for a partial recommendation. Why? (ind)
- Both the recommended and excluded areas contain equal scenic and cultural values. The sights and sounds from roads in the Valley of the Gods would not be significant because they are seldom traveled. The BLM recommendation is based on weak, inconsistent arguments. (ind)
- The canyons in the WSA are the most scenic parts of the entire Lime Creek drainage and are easily accessible prime day-hiking areas. (ind)
- How would wilderness designation affect private and State inholdings? (ind, ga)
- Would wilderness designation be consistent with local and State land use plans? (ga)
- The manageability problem is not any greater here than in any other WSA. (ind)
- The SSA cites manageability as a reason for deleting 29,200 acres, yet impacts to energy and mineral development would not be significant. Only the access potential to oil and gas leases, however unlikely, is addressed by the Partial Alternative. (ind)
- The SSA rationale for deleting a large portion of the WSA was unjustified in view of the significant wilderness values (e.g., archaeological) in the deleted portions, which would benefit from designation. (ga)

San Rafael Reef WSA

- The occurrence of the sensitive plant species *Hymenoxys depressa* in or near this WSA should be considered in the decision-making process. (lug)
- Does the area have oil and gas potential? (ga)
- Wilderness designation would protect San Rafael River, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)

Scorpion WSA

- Mineral resource potential and development would conflict with wilderness designation. (ind)
- Would BLM wilderness areas be consistent with other adjoining Federal lands? (ga)
- BLM's preliminary planning recommendation of no wilderness is an error in the wrong direction. (ind)
- At least the 11,400 acres of this WSA mentioned in the scoping brochure as meeting Wilderness Act standards should be part of BLM's final proposal. (ind)
- Apparently there were irrational deletions of all or parts of the WSAs and ISAs. After review of the SSA summaries in the scoping document, it becomes apparent that many areas have no resource conflicts and excellent wilderness qualities, and yet no acres were recommended for wilderness. (ind)
- Based on the scoping document, it would appear that any possibility for other resource uses is used to remove acres from wilderness consideration. Scorpion WSA 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. (ind)

SPECIFIC WSA ISSUES AND CONCERNS

Sids Mountain WSA

- The occurrence of the sensitive plant species *Pediocactus despainii*, *Hymenoxys depressa*, *Cryptantha jonesiana* and *Lomatium junceum* in or near this WSA should be considered in the decision-making process. (lug)
- Does the area have uranium potential? (ga)
- Conflicting uses (ORVs) should not be a factor in dropping all or part of this WSA. (ind)
- The boundary along the western edge of the WSA appears to be appropriate. However, the WSA boundary should be modified to exclude the Moore Road corridor and the adjacent area, which were previously disturbed by road building and ORV use. The boundary should begin at the cliff edge within Section 33. (lug)

Spruce Canyon WSA

- In the SSA, the analysis of impacts to energy and critical resources failed to quantify or state how there would be adverse impacts when the economic feasibility of development (meeting the prudent man test) is remote. The mere presence of pre-FLPMA oil and gas leases is not sufficient cause to eliminate the WSA. The analysis should indicate the need and potential for minerals. (lug)
- The analysis should consider minerals and other resources available outside the WSA and the effect of lost lease royalties on local socioeconomics. (lug)
- Do questionable low-to-medium oil and gas potential (f2) and moderate coal tonnage outweigh wilderness values? (lug)
- What criteria and systematic analysis were used to evaluate the relative values of competing resources? These factors must be applied consistently in all the SSAs. (lug)
- Would there actually be a problem of manageability with respect to pre-FLPMA oil and gas leases? (lug)
- Would wilderness designation be consistent with local and State land use planning? (lug)
- Cost/benefit analyses are needed to identify wilderness economic trade-offs. (lug)
- What local economic effects would wilderness designation create? (lug)
- Maps and charts in the SSA are poorly defined and difficult to interpret. (lug)

- The Draft SSA failed to quantify statements but uses "numerous, high, low, lack of" etc. (lug)
- What assumptions were used for the SSA analysis? How was "No Action" incorporated into "No Wilderness?" (lug)
- Is it an analysis assumption in the SSA that Congressional designation could override specific management actions? (lug)
- Worst-case analysis in the SSA was applied in a biased manner. Because only 0.1 VD per acre is predicted, any increase in popularity of the region is discounted. (lug)
- The recreation opportunities discussion in the SSA does not use BLM's own ROS. Descriptions are not experience oriented. (lug)

Steep Creek WSA

- The EIS should evaluate potential range improvements for elk along the north boundary area of this WSA. (ga)

Swasey Mountain WSA

- The occurrence of the sensitive plant species *Sclerocactus pubispinus* in or near this WSA should be considered in the decision-making process. (lug)
- The EIS should analyze the potential for conflicts with spring and stock pond developments for livestock operations. (ga)

Turtle Canyon WSA

- Does this area have oil, gas, and coal potential? (ga)
- A large portion of this WSA needs and lends itself to mechanical development of deer winter range. Vegetation manipulation and improvement are necessary to maintain a viable deer herd in this area. (ga)
- Wilderness designation would protect Range Creek, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- The EIS should discuss land use conflicts as a result of wilderness designation. (ga)
- The WSA should be excluded from designation. Other areas could be reduced in size. Also, wilderness should be limited to areas without impacts (roads/ways) by man. (psm)

- The WSA contains a homestead, agricultural fields, and a extensively used way/road to the Green River. (psm)

Wah Wah Mountains WSA

- The occurrence of the sensitive plant species *Cryptantha compacta*, *Sphaeralcea caespitosa*, *Sclerocactus pubispinus* and *Penstemon nanus* in or near this WSA should be considered in the decision-making process. (lug)
- Were the naturalness criteria consistently applied? Portions of this WSA are believed to contain significant intrusions. (psm)

Wahweap WSA

- Juniper trees on the now defunct site of the Kaiparowits power plant on Four Mile Bench are among the oldest of their species anywhere. This should be a consideration in decisions affecting this WSA. (ind)
- The Wahweap SSA notes the significant scientific value of the Four-Mile Bench old tree area. Nonetheless, this tract is not inside recommended wilderness designation. Why? (lug)
- The occurrence of the sensitive plant species *Cymopterus higginsii* in or near this WSA should be a factor in the decision-making process. (lug)
- BLM's concern for natural sediment and salinity seems hollow because this agency often allows coal development which would result in increased sediment, salinity, water contamination from mines, acid rain, and "people pollution." (lug)
- There are potential conflicts with water resource issues related to livestock grazing, wildlife, and erosion control. The EIS needs to evaluate these issues. (ga)
- Would coal resources and development have an effect on wilderness designation? (ga)
- This WSA should not be designated wilderness due to the conflict between preservation of wilderness characteristics and development of coal and other mineral resources. (lug)
- When assessing the mineral potential of a WSA, the feasibility of extracting the mineral commodity must be addressed (i.e., quality, quantity, market). (lug)
- The range improvements proposed for this WSA would seem to argue against wilderness designation. However, the likely adverse

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impacts from all the proposed and possible developments should strengthen the case for designation of this WSA. (lug)

- This WSA contains Anasazi sites which should be protected by wilderness designation. (ind)
- As for ORV conflicts, BLM has plenty of acreage elsewhere for ORV activities. (lug)
- Why delete Cottonwood Canyon when it meets all the criteria? (psm)
- The existence of supplemental values (special features) does not justify recommending an area (70,380 acres) disproportionately larger than that possessing mandatory characteristics (1,000 acres). (lug)
- Providing a buffer zone for wilderness characteristics on a portion of the WSA for manageability purposes is contrary to Wilderness Study Policy guidelines. (lug)
- The EIS should discuss land use conflicts as a result of wilderness designation. (lug)
- Would wilderness designation be consistent with local and State land use planning? (lug)
- The EIS should discuss boundary adjustments as they might affect wilderness manageability. (lug)
- Cost/benefit analyses are needed to identify wilderness economic trade offs. (lug)
- Manageability should be de-emphasized as a criteria for denying designation. Just because management could be difficult (e.g., ORV control) does not mean it could not be accomplished by some means (fences, ranges, etc.). (psm)
- The Draft SSA claims that only 10 percent of the 134,000-acre complex of canyons, benches, cliffs, and badlands offers outstanding solitude and none offers outstanding primitive recreation. This is absurd and must be explained. (lug)
- Outstanding opportunities are the norm in this WSA (hike it, fly it, or look at a map) and SSA claims to the contrary jeopardize the wilderness review process. (lug)
- In the SSA, BLM should define the boundaries of the area containing wilderness characteristics as defined during the inventory and not as altered by new evidence. (lug)
- BLM documents (technical reports) indicate that the area containing outstanding solitude amounts to only 1,000 acres (0.75 percent), not the 10 percent indicated in the SSA. The

SSA offers no basis for the 10-percent conclusion, and no additional field investigations were done during the study phase. (lug)

- There is no justification offered in the SSA for the conclusion that bench areas (Four Mile, Jack Riggs, and Horse Flat) do not have solitude. (ind)
- The SSA conclusion that there is no outstanding opportunity for primitive recreation is erroneous. Many have reported exceptional backpacking experiences in the area. How was the "intrinsic analysis" conducted and why did it reach its erroneous conclusion? (lug)
- The SSA repeatedly notes the beauty of the Rim Rocks area but excludes it from the recommendation. (lug)
- Data presented in the preliminary SSA is contradictory and inadequate (i.e., no page numbers, omission of referenced Table 1, omission of several needed maps, no mention of the fact that 1,400-year old juniper trees are located in a proposed land treatment area). (lug)
- The SSA does not mention the importance of wilderness designation in preventing surface disturbances which add to sediment and salinity yields. (lug)
- The SSA does not mention that the sediment and salinity resulting from coal development would add to the Colorado River. (lug)
- The SSA contains inconsistencies in references as to the quality of wilderness values. (lug)
- The SSA is inconsistent in the discussion of the importance of ORV conflicts. (lug)
- There is an arbitrary and unexplained conclusion that scenic and scientific values are limited to 7,600 acres in the SSA. (lug)
- There is a lack of data in the SSA providing "an adequate basis for projecting site density or significance" of cultural resources. (lug)
- The SSA contains ambiguous reference to the outside sights and sounds of future coal development. (lug)
- No discussion of the relative feasibility and importance of the extensive proposed land treatments is contained in the SSA. (lug)
- There are inconsistencies within the SSA. It is stated that certain mineral resource potentials are low and then that these resources would be foregone. (lug)

- The Draft SSA recommendation compromises legitimate mineral rights to protect an area possessing the mandatory characteristics but which is smaller than the statutory minimum area. (lug)
- The Draft SSA states: "The WSA contains many roads and ways and is quite accessible." How was this portion of the WSA identified as meeting the naturalness criterion? (lug)
- The SSA conclusion that the intrusions in the Coyote Creek area south of Riggs Bench are substantially unnoticeable is wrong. (lug)
- Private field analysis submitted during the inventory phase substantiates extensive evidence of coal exploration, including one way and drill pads, in areas of the WSA. (lug)
- The unqualified representation in the introductory pamphlet misrepresents the extent of preservable wilderness characteristics in the WSA and inflates its importance for designation. It is as though Cedar City does not want to consider Wahweap and never has. (lug)

Westwater Canyon WSA

- This WSA is a significant source of sediment to the Colorado River system, and control activities should be allowed. (ga)
- Wilderness designation would protect Range Creek, which is a Nationwide Rivers Inventory segment with potential for study and addition to the National Wild and Scenic Rivers System. (ga)
- The area has high wilderness values, particularly those associated with opportunities for river-related recreation, and has been recommended for Wild and Scenic River status, which favors its designation as wilderness. (ga)
- The recommendation (Partial Wilderness Alternative) was based on "manageability," but no rationale was offered. What is not manageable? Likewise, there was exclusion of one unit (130A) because it would be impacted by sights and sounds from Picture Gallery Ranch. What sights and sounds? (lug)

Winter Ridge WSA

- An in-depth plant inventory should be conducted to confirm the presence of threatened and endangered species and provide a more complete picture and understanding of plant species and ecology in the Book Cliffs region. (lug)

SPECIFIC WSA ISSUES AND CONCERNS

- The presence of endangered species represents a special opportunity for sightseeing, photography, and study. (lug)
- Wilderness character has been impaired in a portion of the WSA because of oil and gas exploration. This should be addressed in the SSA. (lug)
- Pre-FLPMA leases can be developed without degrading wilderness values. (lug)
- The existence of the leases does not prove that oil exploration or production will actually occur on those tracts. (lug)
- Had BLM enforced nonimpairment criteria, the recreation opportunities, now down-rated by the BLM, would be as high as ever. (lug)
- While the SSA states the WSA lacks naturalness, most imprints are admitted to lie almost exclusively in Main Canyon. This data justifies the Partial Alternative but not unsuitability for the entire WSA. (lug)
- Outstanding opportunities exist on over 73 percent of the area. This area qualifies for wilderness, and the Partial Wilderness Alternative is viable. (lug)
- The BLM IMP was violated frequently while the WSA was under appeal. It appears that those impairments will be used as the rationale to find the WSA unsuitable. (lug)
- Impairment during the appeal period leaves only the western and northwestern portions of the WSA as a manageable contiguous unit. Either the impairments should be reclaimed or the boundary adjusted to exclude the areas. No serious consideration of boundary adjustments was evident in the SSA. (lug)
- Wording of the SSA indicates proposed developments are a foregone conclusion. (lug)

Mancos Shale Badlands, Mt. Ellen-Blue Hills WSA

DIVERSITY

The following comments were made concerning the use of diversity. Commentors were asked the following questions: "How should diversity be used as a criterion in designating wilderness?" and "How much weight should be given to diversity?"

- Areas should be judged on an individual basis according to their uniqueness and designated accordingly. (lug, psm)
- There is a need to designate more than one example of each type. (lug)
- Do not use the diversity criteria. (lug, ga, psm)
- Spread wilderness evenly throughout the State. Do not concentrate it in one area. (lug)
- The diversity criteria should be used and emphasized. (lug)
- Wilderness should be removed from population centers. (lug)
- Do not use diversity to eliminate areas. (lug, ind)
- The diversity criteria should include other things (e.g., complete range of natural values, wildlife, archaeology, etc.). (lug)
- Apply diversity on a national basis. (lug, ind, psm)
- Do not use the Bailey-Kuchler classification system. (lug, ind, psm)
- The diversity criteria are too general and do not take into account the natural variety of the WSAs. (lug)
- Cluster wilderness areas to preserve large natural systems. (lug, psm)
- Clusters of wilderness areas could provide the diversity of resources conducive to related economic development. (ga)
- Use diversity to add wilderness. (ga, ind, psm)
- Use the diversity criteria to a limited extent. (ga)
- National Parks already supply everything wilderness would; do not use diversity. (ga, ind, psm)
- Diversity should not be a criteria unless the scale is spelled out (national, state, regional, global, local). (ind)
- Mesa tops should be recommended as unsuitable, but canyons as suitable. (psm)
- BLM is using the scoping process to introduce political aspects in the wilderness review (e.g., diversity). Diversity should not be used in developing EIS alternatives. Instead, BLM should use two factors: (1) manageability as wilderness; and (2) elimination of resource conflicts. (ind)

- WSAs near National Parks and recreation areas should be given special consideration. (ind)
- A representative sample of wilderness should be designated, but not more than one or two examples of each. (ind, psm, lug)
- The Colorado Plateau could greatly add diversity to the wilderness system. These WSAs should be designated. (ind)
- Diversity is an important reason for designating wilderness. (ind)
- Diversity occurs within WSAs. (ind)
- Utah contains unique areas that should be preserved. (ind, psm)
- Do not give the diversity criteria undue emphasis. (ind)
- Use diversity to include as many landforms and ecosystems as possible. (ind, psm)
- Unique landforms and diverse ecosystems favor designation. (ind, psm)
- Wilderness should incorporate various types of landforms to disperse recreation and minimize degradation. (ind)
- Habitat should be classified on a national level. Representative samples of all habitat types should be recommended for designation. (psm)
- What is the cumulative effect of designating all Federal agency WSAs? What is the distinction between them? (psm)
- Priority should be given to areas around National Parks. (psm)
- Every state should have some wilderness. (psm)
- Diversity should be used to resolve resource conflicts. (psm)
- Areas common in Utah should not be considered unique at the national level and should not be the criteria for adding wilderness. (psm)
- Diversity should be used to develop a wide array of alternatives. (psm)
- Diversity should not be any more important than any other criteria. (psm)
- Diversity should be used to perpetuate multiple use without further development. (psm)
- Diversity should be used to perpetuate multiple use with further development. (psm)
- Diversity should be considered as a special feature or supplemental value. (psm)

- Diversity should be applied only after WSAs are identified. (psm)
- In addition to diversity, recreational values of parks and WSAs should be considered. (psm)
- The area should be left in multiple use. (psm)
- Archaeological values should be emphasized. (psm)
- Wilderness should not be designated because of any one thing. (psm)
- The BLM should rotate wilderness (rest-rotation system)—develop it now and then use it later as wilderness. (psm)
- Wilderness should not be designated close to National Parks or other wilderness areas. Areas should be distributed evenly throughout the state, not clustered. (psm)
- Wilderness should not be designated in southern Utah. (psm)
- Geographic distribution should be applied to vegetation. (psm)
- WSAs close to SMSAs should be designated. (psm)
- WSAs far away from SMSAs should be designated. (psm)
- Distance from SMSAs should not be a factor. (psm)
- Distance from SMSAs should be a factor. (psm)
- Additional SMSAs should be added to those we are already using. (psm)
- There should be enough representation of each landform to prevent overuse of any one area. (psm)
- Only sandstone canyons should be designated. (psm)
- Only unique landforms should be considered. (psm)
- Diversity of landforms should not be used to eliminate WSAs. Unique areas should be given additional weight. (psm)
- Diversity should also include wildlife, threatened and endangered plant and animals, etc. (psm)
- Diversity should be a major criteria and should be considered across the entire NWPS as applied to Utah. (psm)
- A diversity of wilderness areas should be provided throughout the State. Conflicts with other recreational uses could be reduced by geographic separation of uses/users. (psm)

ALTERNATIVE DEVELOPMENT--EMPHASIS ON WILDERNESS VALUES

ALTERNATIVE DEVELOPMENT

All participants were requested to provide BLM with criteria for development of alternatives. To assist in this effort, BLM suggested two options for alternatives: an alternative emphasizing wilderness values and another emphasizing commodity values. This section presents the resulting comments.

Alternative Development—Emphasis on Wilderness Values

Criteria

Geology and Topography

- Topographical integrity (total grouped area of contiguous WSAs) should be maintained and used as criteria for alternative development. (psm)
- Areas should not be deleted from a suitable recommendation because they lack topographic screening. (psm)

Vegetation

- Those WSAs or portions of WSAs that contain diverse or unique plant or animal species or communities (including threatened and endangered and sensitive species and their habitat) should be designated. (lug, psm)
- Unique plant species (e.g., bristlecone pine) and riparian areas should be used as criteria to include WSAs in an alternative. (psm)
- Ecological integrity (total grouped area of contiguous WSAs) should be maintained and used as criteria for alternative development. (psm)
- Entire ecosystems should be preserved by wilderness designation—not just part of an ecosystem. (psm)
- Areas should not be deleted from a suitable recommendation because of lack of vegetative screening. (psm)
- Developed areas should be reclaimed and returned to the wilderness system. (psm)

Mineral and Energy Resources

- Where mineral conflicts exist, only those areas economically capable of producing minerals not obtainable elsewhere should be excluded from designation. (psm)
- Speculative mineral potentials should not be given priority over known wilderness values. (psm)

- Present leases or claims should not be considered in the wilderness evaluation/designation process. (psm)
- Mineral values should not be considered in the wilderness evaluation/designation process. (psm)
- Future needs should not be considered when evaluating mineral potential. (psm)
- In those WSAs with mineral conflicts, use boundary adjustments rather than dropping whole WSAs to reconcile conflicts. (lug)

Wildlife

- WSAs with threatened and endangered species and unique species (i.e., bison and eagle) should be considered for designation. (psm)
- Threatened and endangered animal species' habitat should be given high priority for designation. (psm)

Livestock Grazing

- An alternative in the EIS should consider the elimination of livestock grazing. This is because range improvements often do more harm than good, and overgrazing by sheep and cattle is a problem in many areas. (ind)
- Do not use parameters of livestock grazing in alternative development criteria. The feeling is that conventional livestock management would not be adversely affected by wilderness designation. (psm)
- Before range improvements and range improvement potential are used in alternative development criteria, they must clearly show a favorable cost-benefit analysis. (psm)
- Grazing concerns should not be used as a criteria to drop areas from designation consideration. (psm)

Cultural Resources

- Areas with special archaeological values should be designated. (psm)
- Archaeological values should be used as a criteria to include WSAs in an alternative. (psm)

Recreation

- Before ORV closures are used as criteria for recommending a WSA unsuitable, it must be demonstrated that there are no other adequate alternative areas for ORV use. (psm)
- Increased recreational use should not be a factor for nondesignation. BLM's ability to manage increased recreation should not be used as a criteria. (psm)

Wilderness

Wilderness Values

- WSAs with wilderness values needing protection should be designated. (psm)
- Given the small amount of acreage being reviewed, wilderness values should be given priority over other values and conflicts in alternative development. (psm)
- If wilderness values are high or unique, they should take precedence over other conflicting values, and the area should be recommended as suitable. (psm)
- Wilderness values should outweigh all other values in alternative development because areas suitable for designation are now limited and are of such high demand. (psm)
- Ranking WSAs should not be used as a means to delete areas. (psm)

Size

- Large size should enhance an area's potential for designation. This enhances wilderness values such as solitude. (psm)
- Areas less than 5,000 acres which are adjacent to other WSAs or roadless areas should be considered suitable for designation. (psm)
- Size should be used as a criteria for alternative development. The larger, the better: ecosystems are likely to be more natural and better developed just by virtue of their size. (psm)
- In development of alternatives, it should be remembered that WSAs represent a small percentage of BLM land in Utah. Likewise, any development that would be precluded by wilderness designation would also be small. Therefore, BLM should clearly demonstrate why a WSA should not be designated. (psm)
- Utah has more areas with higher wilderness values; therefore, it should have a greater percentage of wilderness. (psm)
- Due to the relatively small acreages involved in wilderness compared to other states, there should be a number of "High Wilderness" alternatives. (psm)
- Given the small amount of acreage being reviewed, wilderness values should be given priority over other values and conflicts in alternative development. (psm)
- WSAs should not be "partialled"; the entire area should be recommended suitable for designation. (psm)

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Naturalness

- WSAs containing ways suitable for wilderness should be recommended because they will be rehabilitated. (psm)
- Designate those areas that would remain wilderness regardless of alternative. (psm)
- Those areas which display little or no disturbance and which would, therefore, be preserved in their present state through wilderness designation should be designated. (lug)
- Cherrystemming does not degrade wilderness values and should not preclude recommending an area as suitable. (psm)
- No further development should be allowed in WSAs. (psm)
- Roads should not be used as criteria to drop a WSA from consideration in an alternative. (psm)
- Some man-made intrusions, such as cabins, should not be used to drop a WSA from consideration. (psm)
- If existing intrusion(s) can be restored (to pre-intrusion wilderness value conditions), it (they) should not be used as criteria for non-designation. (psm)
- An alternative should consider the development of buffer zones to protect wilderness. (psm)
- WSAs with no ways or maintained roads should be recommended suitable. (psm)

Opportunities for Solitude and Primitive, Unconfined Recreation

- Outstanding opportunities for primitive and unconfined recreation should be considered in wilderness designation. (lug)

Special Features

- Present scientific resources are a resource base for future scientific studies and should be preserved. (lug)
- Supplemental values (special features) represent potentially significant scientific and aesthetic resources and each, in combination with other special values, should be recognized and preserved. (lug)
- Those areas containing unique geologic formations should be designated wilderness. (psm, lug)
- Unique landforms should be considered as criteria to include WSAs in an alternative. (psm)

- Canyon slickrock areas should be recommended suitable because they are nationally unique and have high wilderness values. (psm)
- Distinctive landscape and landform types should be recommended as suitable. (psm)
- All WSAs with distinctive landform qualities that contribute to diversity in the NWPS should be recommended for designation, regardless of conflicts. (psm)
- Unique areas (e.g., Mancos shale) should be recommended suitable. (psm)
- Supplemental values should enhance a WSA's suitability for designation. However, lack of supplemental values should not detract from a WSA's suitability for designation. (psm)
- BLM primitive areas should be considered in alternative development. (psm)
- Due to the unique nature of Utah's WSAs and the features found nowhere else in the world, there should be a number of "High Wilderness" alternatives. (psm)
- Unique plant species (e.g., bristlecone pine), outstanding recreation potential, threatened and endangered species and habitats, riparian areas, unique landforms, and archaeological values should all be used as criteria to include WSAs in an alternative. (psm)
- Threatened and endangered species and habitats should be given high priority for designation. (psm)
- Unique areas should receive high priority for protection. (psm)

Geographic Distribution

- Geographic distribution should be maximized --use it to add areas. (psm)
- Remoteness from population centers should favor designation. (psm)
- Wilderness quality criteria should be lowered for WSAs near large population centers. (psm)

Conflicts With Other Resources

- Rather than lose a wilderness area (nondesignation) due to some conflicts, an adequate partial alternative for each WSA should be analyzed. (ind)
- Recommend as suitable all WSAs except those with significant resource conflicts and small supplemental wilderness values. Ignore resource conflicts in areas where wilderness values are important/high (i.e., the Kaiparowits Plateau) and areas over 100,000 acres in size. (ind)

- Only those areas found acceptable by pro-wilderness groups following on-the-ground inspections should be recommended as suitable. (psm)
- The potential for some impairment from other uses should not be a determining factor in recommendations for or against designation. (lug)
- All WSAs should be designated as wilderness except for those that have real resource conflicts. (ind, psm)
- The conflict should be eliminated rather than the area. (ind, psm)
- Significant wilderness values should take precedence over marginal mineral resource values. (psm)
- In development of alternatives, BLM must prove that resource conflicts are legitimate and cannot be resolved (roads can be closed by gates, etc.). (psm)
- If a conflicting resource value exists in an area adjacent to a WSA, it should not be used as rationale for dropping a WSA from consideration. (psm)
- Conflicting recreational uses in a WSA should not be a factor in dropping WSAs or excluding portions of WSAs if alternative non-wilderness areas of reasonable size and accessibility are available. (psm)
- Those areas not yet impacted by development need to be preserved. Designate those areas with no conflicts. (psm)
- Renewable resources should be favored over those that are nonrenewable. (psm)
- If wilderness values are high or unique, they should take precedence over other conflicting values and should be recommended as suitable. (psm)
- Post-FLPMA impacts must not be used to exclude a WSA from designation. (psm)

Wilderness Review Process

- All WSAs, even those under appeal to IBLA, should be considered in the alternatives. (psm)

Access

- Ease of access to the public should not be a criteria for designation of wilderness. (psm)

Land Use and Land Use Plans

- Local, county, or State planning criteria should not be a factor in wilderness selection. (psm)

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- State and private inholdings should be included to maximize WSAs. (psm)
- Land use and valid existing right conflicts should preferably be resolved by boundary adjustments when such adjustments would not significantly compromise the wilderness quality of a particular WSA. (ga)

Economics

- Use a low socioeconomic impact alternative. (lug)
- Most WSAs would have little or no socioeconomic impact if designated. (psm)
- Economics should not be weighed as heavily as aesthetic values. (psm)
- WSAs should be recommended suitable unless there is a clear, overriding, non-speculative economic value that designation would preclude. (psm)

Social and Public Attitudes

- Local opposition should not prevent wilderness designation. (psm)
- The psychological benefits of wilderness should be considered when making suitability recommendations. (psm)

Manageability

- Manageability should not be used as an excuse for nondesignation. (ind)
- Consideration should be given in an alternative to extending WSA boundaries outward, rather than inward to improve manageability. (ind)
- Buffer zones should be considered. (psm)
- Development can be compatible with wilderness. (psm)
- Air Force overflights should not be a criteria for unsuitable recommendations. (psm)

Interagency Consultation and Coordination

- Alternatives should be formulated and wilderness designated without consideration of other Federal lands (i.e., national parks, withdrawals, military reservations, etc.). (psm)
- Extend existing national parks and primitive areas. (ind)
- The Project BOLD Alternative should be used. (lug)
- In view of Project BOLD, there should be an alternative which redraws WSA boundaries to include State sections. (ind)

- Areas adjacent to national parks and forests should be designated. (psm)

Miscellaneous Criteria

- All lands that meet the basic requirements of FLPMA should be designated wilderness. (ind)
- The following criteria should be used in formulating alternatives:
 - A. Acreage should not be excluded because someone thinks money can be made on some resource that might be there.
 - B. Acreage should not be excluded because areas are not as diverse locally as some might like.
 - C. Acreage should not be excluded because it is not an easy 6-hour drive from Salt Lake City or Las Vegas. (ind)
- The "High Wilderness Alternative" should be chosen. (lug)
- The list of proposed alternatives provided by the Sierra Club should be used. (lug)
- The current All Wilderness Alternative (as shown in the Scoping Brochure) does not include All Wilderness. This alternative should be renamed "All Current WSA Acreage Included as Wilderness Alternative." (lug)

- It is proposed that the All Wilderness Alternative include the 163 areas totaling 6.2 million acres identified by the Sierra Club. The areas possess the required wilderness values using BLM criteria. (lug)
- Weigh WSA decisions in favor of wildlife, wild horses, species diversity, habitat preservation, and strict enforcement of laws protecting such values. (lug)
- The All Wilderness Alternative is not enough. More areas in Utah deserve to be set aside as wilderness. (ind)
- An alternative should consider designation of wilderness for 80 to 90 percent of the WSAs with the remainder given an Area of Critical Environmental Concern (ACEC) status. The highest preference for designation should be those areas that (1) have outstanding wilderness attributes; (2) have low to moderate resource conflicts; and (3) share contiguous boundaries with other Federally protected lands. (ind)
- The following should be used as criteria in development of an alternative:
 - A. Preservation and perpetuation of existing ecosystems.
 1. Diversity of wildlife and plant species and protection of threatened and endangered species.
 2. Protection of air quality.

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3. Protection of water quality and fragile drainage patterns.
 4. Soil conservation.
 5. Potential alteration of landform.
- B. Recreation—Mountaineering, hiking, climbing, backpacking, cross-country skiing, hunting, bicycling, swimming, bird watching, photography, cave exploring, picnicking, canoeing, rockhounding (no power equipment), and river running. Any of these types of recreation that may be present are important.
- C. Preservation of cultural and natural resources and research and study opportunities.
- D. Opportunities for solitude and concern for visual aesthetics.
- E. Economics of consumptive uses of wilderness (i.e., grazing, water use, and mining are practices that are not economically sound and need improvement and monitoring). (ind)
- Seventy to 80 percent of the WSAs should be designated. (ind)
 - Areas upstream from canyon WSAs should be included to preserve and control upstream activities. (ind)
 - For high mountain areas, some lowland should be included for providing ecological diversity and wildlife protection. (ind)
 - Areas in addition to existing WSAs should be considered as an alternative. (psm)
 - I recommend designating all of the remaining 3.1 million acres as wilderness. The BLM wilderness review has already eliminated 19 million acres of public land. (ind)
 - WSA status should be granted to all appealed areas and their suitability judged for wilderness on the same basis as all other WSAs. (ind)
 - The EIS should analyze a "further study areas alternative." This alternative would include all the "further study areas" and WSAs under appeal. (ind)
 - The BLM should consider an alternative with more wilderness than the current All Wilderness Alternative. The starting point should be to reinventory the 22 million acres of BLM land in Utah. (ind)

- As much wilderness as possible should be designated. (ind)
- Eighty to 90 percent of the 73 WSAs should be designated wilderness and the other 10-20 percent receive ACEC status. Use the following criteria: (1) outstanding wilderness attributes; (2) low to moderate resource conflicts; and (3) contiguous boundaries with other Federally protected lands.
- All WSAs, plus remand areas, should be evaluated using the following criteria: (1) naturalness; (2) unique landform or geologic formation; (3) endangered or endemic plant or animal species; (4) ease of managing small units adjacent to national parks or monuments (management should be transferred); and (5) opportunities for primitive and unique recreation. (ind)
- The Final EIS should come very close to recommending All Wilderness. The WSAs included in the All Wilderness Alternative are not excessive, the boundaries are sensible, and there are no good reasons for not designating any WSA. (ind)
- The EIS should have several high wilderness alternatives. It should be considered that 19 million acres of BLM land have been dropped from study. The remaining lands with WSA status are all high quality wilderness areas. (ind)

Examples of WSAs Meeting Given Criteria

- Nineteen million acres of public land have been dropped from wilderness consideration: the remaining 3.1 million acres are almost all high quality wilderness. As much of this should be designated as possible, especially those WSAs that possess pristine qualities, opportunities for solitude, unique visual characteristics, and meet all wilderness qualifications. The following WSAs and ISAs meet this criteria: Cedar Mountains, Rockwell, Conger Mountain, Red Mountain, Cottonwood Canyon, Moquith Mountain, Burning Hills, Death Ridge, Scorpion, Flume Canyon, Fifty Mile Mountain, Wahweap, Paria-Hackberry, Escalante Canyons Tract 5, French Spring-Happy Canyon, Mt. Pennell, Mule Canyon, Cheesebox Canyon, Bridger Jack Mesa, Jack Canyon, Coal Canyon, Spruce Canyon, and North Escalante Canyons/The Gulch. (ind)
- Areas with exceptional natural scenic beauty should be recommended suitable for designation (e.g., San Rafael Reef and LaVerkin Creek). (psm)

- All WSAs with high potential and critical wildlife habitat should be designated (i.e., riparian zones in desert settings such as Steep Creek, Dirty Devil, and Book Cliffs, and important raptor areas and lambing zones for bighorn sheep). (psm)
- High wilderness values should outweigh questionable non-wilderness resource development values (e.g., Book Cliffs, Flume, Floy, Coal, Spruce, and Desolation canyons WSAs). (psm)
- It is proposed that an alternative be constructed which favors habitat preservation, riparian areas, species diversity, wild horses, and wildlife over livestock. The following WSAs are examples of areas that possess these values and conflicts: (lug)

020-094 Cedar Mountain
020-060 Deep Creek Mountains
020-061 Swasey Mountain
050-035 Conger Mountain
050-070 King Top
040-123 Cougar Canyon
040-046 Cottonwood Canyon
040-153 LaVerkin Creek
040-146 Deep Creek
040-230 Parunuweap Canyon
040-143 Canaan Mountain
040-268 The Blues
040-077 Mud Spring Canyon
040-247 Paria-Hackberry
040-248 Wahweap
040-079 Burning Hills
040-061 Steep Creek
040-076 Carcass Canyon
040-080 Fifty Mile Mountain
050-238 Mt. Ellen-Blue Hills
050-242 Bull Mountain
050-237 Horseshoe Canyon (South)
050-248 Mt. Pennell
050-247 Little Rockies
ISA Grand Gulch Complex
060-191 Cheesebox Canyon
ISA Dark Canyon Complex
050-169 Butler Wash
060-138 Negro Bill Canyon
060-045 Horseshoe Canyon (North)
060-028A Crack Canyon
060-007 Muddy Creek
060-023 Sids Mountain
060-068A2 Jack Canyon
060-068A1 Desolation Canyon
060-067 Turtle Canyon
060-068B Floy Canyon
060-100C2 Coal Canyon
060-118 Westwater Canyon
060-730 Winter Ridge

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- A better rationale is suggested for the greatly reduced preliminary planning recommendation acreage for the Parunuweap Canyon WSA. This WSA would greatly complement Zion National Park. There are approximately 11 miles of the East Fork of the Virgin River in this WSA. The 1,800-acre chaining project (identified in the SSA) is on the rims and should not affect the river canyon. The area below the cliffs should be included in a wilderness proposal. This information should be used in formulating alternatives concerning this WSA. (ga)
 - Maximum wilderness alternatives should not be limited to 100 percent of all existing WSAs. An alternative should consider all land meeting minimum wilderness criteria. One alternative should consider 150 percent of the acreage now included in the All Wilderness Alternative. Areas particularly recommended for designation are: Grand Gulch, Road Canyon, Fish Creek Canyon, Mule Creek Canyon, Cheesebox Canyon, Dark Canyon, Butler Wash, Horseshoe Canyon (North), San Rafael Reef, Devils Canyon, Desolation Canyon, Coal Canyon, Scorpion, Escalante Canyons Tract 5, Fifty Mile Mountain, Wahweap, Paria-Hackberry, North Escalante Canyons/The Gulch, Phipps-Death Hollow, Horseshoe Canyon (South), Mt. Ellen-Blue Hills, French Spring-Happy Canyon. (ind)
 - An alternative should be developed that includes areas that have been eliminated because of small size or other "manageability problems" which are near national parks or other jurisdiction. Many of these small areas are prime wilderness and would fit nicely into the NPS. Also, areas eliminated because of State section interference should be reconsidered taking Project BOLD changes into consideration. Examples of such areas include: Red Mountain, Cottonwood Canyon, LaVerkin Creek, Deep Creek, North Fork Virgin River, Orderville, Parunuweap, Canaan Mountain, Scorpion, and Escalante Canyons Tract 5. (ind)
 - All those WSAs found in Alternative 2, plus 10 other areas (144,690 acres) (Rockwell, Cougar Mountain, Red Mountain, Cottonwood Canyon, Moquith Mountain, Scorpion, Escalante Canyons Tract 5, Mt. Pennell, Mule Canyon, Mud Springs Canyon, and Parunuweap Canyon), and an additional 13,600 acres in WSA 040-230 should be designated, using the following criteria: (1) no or minimal conflicts; (2) outstanding opportunities for recreation and solitude; (3) special features; (4) high quality naturalness; and (5) areas adjacent to national parks/recreation areas or other wilderness. (ind)
 - WSAs included in the preliminary suitability recommendation should be designated, plus the following WSAs or partials and 13,600 additional acres in WSA 040-230. These WSAs include Rockwell, Cottonwood Canyon, Escalante Canyons Tract 5, Red Mountain, Mt. Pennell, Moquith Mountain, Mud Springs Canyon, Cougar Mountain, Mule Canyon, Scorpion, and Parunuweap Canyon. (ind)
 - All BLM lands that qualify should be designated plus Newfoundland Mountains, Dugways, Central Wah Wahs, Paria-Hackberry, Fiddler Butte, Cheesebox Canyon, all Kaiparowits WSAs, Mt. Pennell, Blue Hills, Floy Canyon, Scorpion, French Spring-Happy Canyon, Mule Canyon, and Parunuweap Canyon. (ind)
 - North Escalante Canyons/The Gulch ISA and Fifty Mile Mountain WSA should be designated because of scenic quality. (psm)
 - The Grand Gulch Complex ISA is an outstanding potential wilderness area because of attendance, recreational potential, threatened and endangered species, critical wildlife habitat, riparian areas, and archaeological values (i.e., Anasazi ruins). These need protection. (psm)
 - The preferred alternative should consider more acreage than is included in the preliminary suitability recommendation. Minimal resource conflicts have been used to exclude sizeable areas. Specific areas recommended for inclusion are the Newfoundland Mountains, Dugway Range, Kaiparowits, Paria-Hackberry, and Fifty Mile Mountain. (psm)
 - For the North Escalante Canyons/The Gulch ISA, an alternative should consider excluding only the mining resource conflicts identified in the SSA. It is recommended that 89,556 acres be considered rather than the 54,500 acres in BLM's preliminary planning recommendation. (Note that a map has been provided for this alternative recommendation but is not reproduced here.) (ga)
 - The larger alternative partial of 98,110 areas identified in the SSA for Fifty Mile Mountain WSA is preferred over the 51,540 acres identified as BLM's preliminary planning recommendation. The larger acreage is justified because of high wilderness quality, significant archaeological resources, high priority wildlife habitat in good condition, and lack of resource conflicts. (ga)
 - The following WSAs surround the Hill Creek Extension Wilderness area: Desolation Canyon, Floy Canyon, Coal Canyon, Spruce Canyon, Winter Ridge, Jack Canyon, and Turtle Canyon. Designation of these WSAs would complement and reinforce the wilderness values and significance of Hill Creek. (psm)
 - The Grand Gulch Complex ISA should not be partialled. (psm)
 - The following is submitted as alternative development criteria:
 - A. All areas recommended as wilderness in the preliminary planning process should be designated. To this all non-recommended WSAs or non-recommended parts of recommended WSAs whose designation would not significantly adversely affect the local or national economies should be added; except for (1) those areas with low wilderness values; (2) areas where Outstanding Natural Areas designation or some equivalent was the preferred alternative in the preliminary planning process; (3) those areas which would prevent site-specific planned local governmental projects such as the water development in the Cottonwood Canyon WSA (only to the extent necessary to let those planned projects go forth); (4) those parts of WSAs which are not natural because of numerous densely packed ways which will not be rehabilitated, and (5) those areas that are not manageable because of ORV use of sand dunes.
- Under this alternative, one would add to the preliminary recommendation such areas as Moquith Mountain, the omitted portions of Parunuweap, the omitted portions of North Escalante, most of the omitted portions of Fifty Mile Mountain, the omitted portions of Road Canyon not on the roaded plateau top, Cheesebox, Mill Creek, and all other such areas whose inclusion would not significantly affect either the national or local economies. From this, one could subtract areas low in wilderness value like Conger Mountain and parts of WSAs low in wilderness values if high wilderness value portions were not also tossed out. One would also subtract areas like Cottonwood Canyon WSA only to the extent necessary to allow planned governmental projects to go forth. Negro Bill and Bridger Jack Mesa where Outstanding Natural Area classification is the preferred alternative

in the scoping package could be subtracted. The non-recommended portions of Swasey and part of the unrecommended portions of Fish and Owl where there are numerous densely packed ways would be subtracted. If the ORV use of the sand dunes in Moquith Mountain could not be managed, the sand dune portions of that unit could be deleted.

- B. All areas recommended as wilderness in the preliminary planning process should be designated plus (1) all unrecommended WSAs or unrecommended parts of recommended WSAs whose designation would not significantly adversely affect the local or national economies; and (2) those areas listed as "Distinctive" or "D-AA" in the scoping package even if there might be significant local effects, unless those areas are underlain by known large amounts of recoverable fossil fuels which are conflicts that cannot be substantially eliminated by boundary adjustments. From this total, the following could be subtracted: (1) areas lacking

wilderness values; (2) the Outstanding Natural Area preferred alternative areas; (3) the Cottonwood Canyon WSA-type areas that prohibit planned local government projects; (4) the parts of areas with numerous closely packed ways; and (5) the sand dune ORV problem areas.

The purpose of this alternative is basically to add the omitted portions of Paria-Hackberry and Red Mountain that have high wilderness value if one thought that their designation would significantly affect the local economies there. Those portions of the Book Cliffs outside the recommended portion of Desolation Canyon, the Tar Sand Triangle, and the unrecommended portions of the Kaiparowits Plateau other than the unrecommended parts of Fifty Mile Mountain would probably not be recommended under this alternative.

In this alternative and in the one that follows, there is a distinction made between areas of high resource value for uranium and non-fossil fuels and areas of high resource values for fossil fuels. This distinction is a meaningful one because the uranium potential, even in high

potential areas, is more speculative because the fossil fuels are likely to be wanted before the uranium is and because the uranium is generally found under areas where there is a greater public awareness of the wilderness values.

- C. One way to sum up both of these is as follows: All WSAs whose designation would not significantly affect the national or local economies should be added to those Distinctive (or "D-AA") areas that might affect local economies not underlain by known commercial reserves of fossil fuels in large quantities. One would also include the recommended portions of Desolation Canyon and all or most of Fifty Mile Mountain. From this, one would subtract the types of areas referred to in the above alternatives that are subtracted for the other meaningful reasons indicated.
- D. Areas of especially high wilderness value (AA, AA-D, D) in Utah ought to be preserved wherever practical because the Utah BLM WSAs are in general unique and of rare types of beauty which should be preserved unless there is a compelling reason not to.
- E. Only extraordinary deposits of known fossil fuels ought to be excluded from designation in an area rated as "Distinctive" or "D-AA." Even then there should be a careful weighing of values and hard looks at possible boundary adjustments. Many of the unrecommended portions of the Book Cliffs, the Kaiparowits Plateau, and the Tar Sand Triangle provide examples of high quality areas where wilderness might not be appropriate. Examples of high resource areas which should, nevertheless, be recommended include Desolation Canyon, Fifty Mile Mountain (or most of it), Phipps-Death Hollow, and the uranium areas like Muddy Creek, Paria-Hackberry (including the high wilderness value areas in unrecommended portions), the Little Rockies, and the area south of Horse Canyon in North Escalante (even though the uranium there is not significant enough to generate a conflict).
- F. Local concerns must be site-specific (like in Cottonwood Canyon WSA) and must be based on something more than generalized opposition to wilderness before they become decisive.

Phipps-Death Hollow ISA

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G. Manageability concerns must be real before they eliminate an area. The existence of mining claims (i.e., in the area south of Horse Canyon in North Escalante), the existence of State sections (i.e., in the Lime Creek area in the omitted portion of Road Canyon), and the existence of occasional ways are not sufficient reason for eliminating high quality areas. For manageability concerns to dictate a deletion, there must be something more substantial, such as the numerous closely packed ways in the trilobite part of Swasey or the inevitable ORV conflicts that arise in the sand dune areas. Even then, only that amount necessary to eliminate the conflicts should be excluded.

H. Where areas having high wilderness values are surrounded by parts of an area which do not have high wilderness values and where the high wilderness parts cannot be included within manageable borders unless low value areas are also included, both the high and the low value areas should be included rather than the other way around. In many cases where high value areas have been tossed out with low value areas, alternative borders might exist. Examples of areas that have high value and ought to be included, even though their surroundings may not be all that magnificent, include the Harris Wash area in North Escalante, the drainages in Scorpion, and (even if you accept the assertion that the high value areas in Parunuweap are surrounded by areas without significant value) Parunuweap. (ind)

- The following are criteria that should be used in development of an alternative:

1. WSAs with at least three or more vegetation zones should be designated.
2. WSAs with canyons possessing distinctive geology and vegetation composition not now represented in any wilderness or national park system should be designated.
3. There should be broad enough representation (of designated wilderness) to encompass the major and unique natural features of the Colorado Plateau, which is unique internationally.
4. The Henry Mountains WSAs are especially unique because there are so many life zones within such close proximity. These WSAs should receive appropriate consideration.

5. WSAs should be designated that are particularly sensitive to man-made disturbance and which may bare the scars of disturbance for centuries.

6. Escalante Canyon and Coyote Gulch areas assume major significance with the loss of Glen Canyon, which is unique internationally.

The following WSAs meet these criteria: Paria-Hackberry, The Cockscomb, Phipps-Death Hollow, North Escalante Canyons/The Gulch, Mt. Ellen-Blue Hills, Dirty Devil, Horseshoe Canyon (South) (this unit contains rare undisturbed upland grass areas), Grand Gulch Complex, Escalante Canyons Tract 5, Road Canyon, Butler Wash, WSAs surrounding Zion National Park, Mexican Mountain, Desolation Canyon, Coal Canyon, Wahweap, and Scorpion. (ind)

Alternative Development—Emphasis on Commodity Values

Criteria

Air Quality

- If air quality standards inside wilderness would restrict development outside boundaries, the WSA should not be designated. (psm)

Soils

- Do not designate wilderness because current reclamation regulations are sufficient to protect wilderness values. (psm)

Vegetation

- Redundancy of ecosystem type should be used as criteria for dropping some WSAs from consideration in a wilderness development alternative. (psm)

Water Resources

- Do not recommend areas where access is required for maintenance of present municipal water systems. (psm)
- Do not designate areas where future needs for culinary systems and expansion of water systems (reservoirs, pipelines, etc.) could occur. (psm)

Mineral and Energy Resources

- If mineral extraction can be accomplished while preserving wilderness values, wilderness should be designated. Restorability should be considered. (psm)

- An alternative should include a description of the nonimpairment criteria and allow for exploration subject to nonimpairment for the purposes of determining the extent of mineralization. (lug)

- Tar sand areas should not be included in designated wilderness. (ind)

- The following should be considered in formulating alternatives and in wilderness designation, especially with WSAs that have oil/mineral potential:

1. The heavy dependence of the U.S. on unstable foreign supplies of critical and strategic minerals.
2. The severe imbalance of foreign trade through the dependence of such minerals.
3. The fact that heavy dependence on foreign supplies could adversely affect national security.
4. Surface and subsurface potential for commodity production.
5. Compatibility of commodity production activities with environmental values. (ind)

- Do not designate wilderness with mineral or energy potential. (psm)

- Do not designate any wilderness. Manage all lands under the multiple-use concept. (psm)

- An area that has no mineral potential now may have some later. Wilderness would preclude later development. (psm)

- Do not have a buffer zone around designated WSAs. Once WSAs are determined unsuitable, do not retain for further study (Permanent Release Language). (psm)

- Consider effects of wilderness designation on existing claims and leases. Do not designate wilderness if additional restrictions would make mineral extraction from existing leases/claims impractical. (psm)

- Mineral values should take precedence over wilderness values. (psm)

- Do not designate wilderness in those areas where present investments or developments would be lost as a result of designation. (psm)

- More effort should be put into the evaluation of mineral potential. (psm)

- Any designated wilderness should allow for mineral access and inventory. (psm)

ALTERNATIVE DEVELOPMENT-EMPHASIS ON COMMODITY VALUES

- The Secretary of the Interior should be given the discretion to lease lands within wilderness nomination and designation for the production of fuels and minerals consistent with national energy self-sufficiency and essential reserves of strategic minerals. (psm)

Forest Resources

- Recommend as unsuitable areas with commercial forest values whose management would complement management of adjacent areas. (psm)

Livestock Grazing

- Certain range developments should be accommodated to gain local support. Therefore, alternatives should be designed around specific legislation that helps ensure continued grazing and present use. (psm)
- If a WSA has a history of livestock grazing, it should be deleted from a wilderness designation alternative. (lug)
- All suitable acreage should be chained or disked and reseeded to increase forage for livestock. The remaining acreage of pinyon-juniper sagebrush, etc., should be improved for shelter for all range animals. Wilderness should not be designated where this kind of improvement would be precluded. (lug)
- In development of alternatives, the development of water and improvement of range productivity, which increase meat production and hunting success ratios, should be a consideration. (ind)
- Wilderness should not be designated if grazing allotments or portions thereof fall within the boundaries of the WSA. (psm)
- High potential for grazing development should be used as criteria not to include a WSA in a wilderness recommendation alternative. (psm)
- Do not recommend wilderness designation in areas where water sources can be improved in terms of number, volume, and reliability. (lug)
- Do not designate areas which have potential for surface/groundwater development for such uses as livestock, wildlife, recreation, municipal, oil shale, and tar sand. (psm)
- If designation would handicap current grazing management practices by precluding the use of modern motorized vehicles, the WSA should be dropped from any wilderness recommendation alternative. (psm)
- A WSA should not be included in a wilderness designation alternative if capital invested in livestock grazing, energy or minerals would be

lost, or if there are existing improvements. Livestock values should outweigh wilderness values where the two criteria are being considered in alternative development. (psm)

- Consideration should be given to dropping portions of WSAs from a wilderness alternative if there is evidence of overgrazing. (psm)
- WSAs should be designated where grazing would not be adversely affected. (psm)

Recreation

- Those areas where monetary/economic recreational use values would exceed other economic values should be recommended as suitable for designation. (psm)

Wilderness

Size

- Recommend as suitable only as much area as is needed. (psm)
- Recommend any buffer zones as unsuitable. (psm)

Naturalness

- Recommend areas as unsuitable if there are intrusions (roads/ways, mining activities, range improvements, etc.). (psm)

Special Features

- Analyze only present primitive areas for wilderness designation. (ind)
- Wilderness should be small areas with unique features. (psm)

Need for Wilderness

- There is enough recreation, solitude, and wilderness already in Utah with existing national parks, NRAs, and State parks. There should be no further wilderness designation in Utah. (ind)
- Recommend all areas unsuitable (we already have enough wilderness; designation would be detrimental to the wilderness criteria). (psm)
- We have enough wilderness now. (psm)
- Confine wilderness areas to national parks. (psm)

Conflicts With Other Resources

- Areas designated should have been historically used for primitive recreation and not have major mining and livestock conflicts. (lug)
- Analyze an alternative containing all WSAs with no major resource conflicts. (ga)

- Boundaries should be adjusted to accommodate other uses and eliminate conflicts (e.g., sub-unit B of Mt. Pennell). (psm)
- Recommend WSAs/portions thereof as unsuitable if designation would conflict with other resource uses (e.g., grandfathered rights, high ORV use, mineral rights, private inholdings, etc.). (psm)
- If non-wilderness values exceed wilderness values, these areas should be recommended as unsuitable. (psm)
- If designation would preclude development outside the area (e.g., air quality, visual zones, distance) recommend as unsuitable. (psm)

Wilderness Review Process

- Alternatives in the Draft EIS should not be based on a percentage or quota system. Such an approach forgets that the function of the study phase (Draft EIS analysis) is to evaluate the suitability of each WSA based on its own characteristics and values.

Access

- Those areas with potential corridors should be recommended as unsuitable. (psm)
- Would wilderness preclude access to other areas outside wilderness? (psm)

Land Use and Land Use Plans

- Future multiple use should be considered. (lug)
- An alternative should be developed based on a uniform and consistent policy regarding the issues of land use and valid existing rights. (ga)
- Areas with conflicting land uses should not be selected for wilderness. (psm)
- Selection of wilderness areas should consider potential uses of all other resources; multiple use should be the criteria over wilderness. (psm)
- Local county or State planning criteria must agree with wilderness selection. (psm)

Economics

- If designation does not have a negative economic impact on local communities, it should be designated wilderness. (lug, psm)
- Wilderness should not be designated where it would cause a negative economic impact to any community. (psm)
- The cost of maintaining wilderness areas should be a selection criteria. (psm)
- An economic cost/benefit analysis should be a determinant for wilderness selection. (psm)

ALTERNATIVE DEVELOPMENT--EMPHASIS ON COMMODITY VALUES

Manageability

- Because of manageability limitations, only WSAs with the highest quality wilderness values should be recommended suitable. (psm)

Interagency Consultation and Coordination

- Designate only those areas adjacent to national parks or other high value areas administered by other agencies (pass administration of other areas to the other agency). (psm)
- Confine wilderness areas to national parks. (psm)

Miscellaneous Criteria

- Do not designate any wilderness. Make all WSAs into Outstanding Natural Areas. Do away with the 5,000-acre minimum criteria. (ind)
- Vote for the No Action Alternative. (lug)
- Alternatives in the 1.49-percent range should give a good enough representation of wilderness. In general, the land should stay basically status quo. (ind)

Examples of WSAs Meeting Given Criteria

- Recommend unsuitable if designation would preclude development of recreational potential (e.g., Desolation Canyon and North Stansbury Mountains WSAs and Island in the Sky) or if present use is greater than it would be if the area is designated (Mexican Mountain WSA). (psm)
- The following areas are believed to have significant hydrocarbon potential and warrant multiple-use designation: Mt. Ellen-Blue Hills, Bull Mountain, Carcass Canyon, Cottonwood Canyon, Desolation Canyon, Diamond Canyon, Dirty Devil, Fiddler Butte, Fifty Mile Mountain, Horseshoe Canyon, Howell Peak, King Top, Little Rockies, Mud Spring Canyon, Notch Peak, Paria-Hackberry, Scorpion, Swasey Mountain, The Blues, Turtle Canyon, and Wah Wah Mountains. (lug)
- Those WSAs adjacent to existing national parks and recreation areas should be designated except those in the Kaiparowits Plateau with known coal resources (e.g., LaVerkin Creek, Deep Creek, North Fork Virgin River, Orderville Canyon, Parunuweap Canyon, Canaan Mountain, Moquith Mountain, Phipps-Death Hollow, Steep Creek, North Escalante Canyons/The Gulch, Horseshoe Canyon [South], French Spring-Happy Canyon, Road Canyon, Fish Creek Canyon, Mule Canyon, Horseshoe Canyon [North]). (lug)

- Manage all WSA acreage under existing Management Framework Plans (MFPs)/RMPs with some modifications to protect special or unique areas in the Tar Sand Triangle. (lug)

- Do not designate Winter Ridge WSA as wilderness due to tar sand potential and existing impacts. (lug)

- Designate those areas which were recommended as preliminarily suitable except those with a moderate to high oil and gas potential. Areas preliminarily recommended suitable but felt to have a moderate to high oil and gas potential are as follows: Paria-Hackberry, The Cockscomb, Wahweap, Phipps-Death Hollow, Steep Creek, North Escalante Canyons, Mt. Ellen-Blue Hills, Bull Mountain, Mt. Hillers, Butler Wash, Indian Creek, Behind the Rocks, Horseshoe Canyon (North), Crack Canyon, Muddy Creek, Sid's Mountain, Mexican Mountain, Desolation Canyon, Turtle Canyon, and Floy Canyon. (lug)

- An alternative should consider a deletion of 40 acres above Section 32, Township 34 South, Range 3 East in the Phipps-Death Hollow ISA. There is a water diversion structure at this location which should be excluded from wilderness designation. (ga)

- With exclusive regard to oil and gas favorability, the following WSAs have fair (F) to good (G) oil and gas potential and should be eliminated from further consideration as wilderness: Cedar Mountains (F), Rockwell (F), Conger Mountain (F to G), King Top (F), Parunuweap Canyon (F), Moquith Mountain (G), Dirty Devil (F), Horseshoe Canyon (South) (F), French Spring-Happy Canyon (F), Fiddler Butte (F), Mancos Mesa (F), Grand Gulch Complex (F), Road Canyon (F), Fish Creek Canyon (F), Mule Canyon (F), Cheesebox Canyon (F), Dark Canyon Complex (F), Butler Wash (F), Bridger Jack Mesa (F), Indian Creek (F), Behind the Rocks (G), Mill Creek Canyon (G), Negro Bill Canyon (G), Horseshoe Canyon (North) (G), San Rafael Reef (F), Crack Canyon (F), Muddy Creek (F), and Devils Canyon (F). (ind)

- The following areas have no evident oil and gas potential: North Stansbury Mountains, Wah Wah Mountains, Mt. Ellen-Blue Hills, Notch Peak, Cougar Canyon, and Bull Mountain. The remaining WSAs have only marginal oil and gas potential. (ind)

- The Deep Creek Mountains WSA should not be designated because of the mineral resources there. (ind)

- Areas within the Book Cliffs should not be designated because of coal, gas, tar sand, and gilsonite. (ind)

- The following WSAs are located in the Paradox Basin and offer a good potential for oil and gas from Paleozoic rocks: Bull Mountain, Dirty Devil, Horseshoe Canyon (South), French Spring-Happy Canyon, Fiddler Butte, Mt. Hillers, Little Rockies, Mancos Mesa, Grand Gulch Complex, Road Canyon, Fish Creek Canyon, Mule Canyon, Cheesebox Canyon, Dark Canyon Complex, Butler Wash, Bridger Jack Mesa, Indian Creek, Mill Creek Canyon, Negro Bill Canyon, Horseshoe Canyon (North), and San Rafael Reef. (lug)

- The following WSAs are located adjacent to the Paradox Basin and also offer a good oil and gas potential from Paleozoic rocks: Mt. Ellen-Blue Hills, Mt. Pennell, Crack Canyon, Muddy Creek, Devils Canyon, and Sids Mountain. (lug)

- The following WSAs offer good potential for oil and gas from Paleozoic and Mesozoic rocks: Floy Canyon, Coal Canyon, and Westwater Canyon. (lug)

- Eliminate portions of WSAs with cherrystems (e.g., Winter Ridge, Flume Canyon, Floy Canyon, Spruce Canyon, and Desolation Canyon). (psm)

- Recommend areas as unsuitable if there is existing access (roads/ways) for big game hunting and ORVs (e.g., Winter Ridge and Jack Canyon) or other intrusions. (psm)

- Recommend as unsuitable cherrystemmed areas and any areas with designated Class D county roads (Road Canyon, Pine Canyon, Jack Canyon, and Winter Ridge WSAs). (psm)

- Designate only those areas with significant special features (e.g., Scorpion WSA). (psm)

- The EIS should thoroughly analyze a partial alternative to identify potential conflicts with minerals, grazing, water resources, and the existing jeep trail in Harris Wash. (ga)

- Because of mineralization in the North Stansbury Mountains WSA, mineral activity will expand. (psm)

- Recommend as unsuitable WSAs traditionally used for firewood and pine-nut gathering (e.g., Road Canyon WSA and Grand Gulch Complex ISA). (psm)

Alternative Development—Other

Criteria

Air Quality

- WSAs with Class I air designation should be selected. (psm)

Geology and Topography

- The landform classification system should not be used in the development of alternatives. (psm)

Vegetation

- All riparian areas should be protected. (lug)
- The inclusion of representative samples of all habitat types and unique areas should be used as alternative development criteria. This classification should be at a national level. (psm)
- The Bailey-Kuchler classification system should not be used in the development of alternatives. (psm)

Water Resources

- WSAs which benefit watershed should be recommended suitable for wilderness designation. (psm)
- Areas without water development potential should be designated wilderness. (psm)
- If water developments are not allowed, do not designate wilderness. (psm)

Mineral and Energy Resources

- Recommend for wilderness designation only those areas which have low mineral potential and possess outstanding wilderness characteristics. (lug)
- Several WSAs should not be proposed for one county (economic impacts [i.e., minerals] would be too great). It could preclude all development in these areas. (psm)
- Do not designate any wilderness unless existing rights are protected.
- The EIS should include an outline of how minerals data will be gathered and how land not recommended for wilderness would be managed. Data may be displayed via Rocky Mountain Oil and Gas Association's (RMOGA's) Matrix System. (lug)

Wildlife

- The presence of wildlife and wild horses should take precedence over livestock. Protection and preservation of wildlife and wild horse habitat should take precedence over livestock interests. (lug)

- Areas without critical wildlife improvement potential should be designated. (psm)
- Wilderness should not be designated were it would inhibit control of feral horses, burros, dogs, cats, etc. (lug)
- Areas prone to becoming overpopulated with wildlife if designated wilderness should not be considered. (psm)
- If the area has potential for wildlife, fish, wild horse and burro management, developments, and range improvements, it should not be designated. (psm)
- Wilderness is all right if critical wildlife habitat could be successfully managed. (psm)
- Wildlife should not be used solely as a criteria for designating an area as wilderness. (psm)

Livestock Grazing

- Grazing should be considered as an impact on wilderness values. Grazing should be weighed in consideration of solitude, naturalness, and primitive, unconfined recreation. The impact(s) of grazing on these values should be considered as criteria when developing alternatives. (psm)

- Livestock grazing should be able to continue unchanged in areas designated wilderness. For example, there should be flexibility in the management of an area (i.e., number of AUMs, season-of-use, etc.) similar to BLM's existing management. (ind)
- Certain range developments should be accommodated to gain local support. Therefore, alternatives should be designed around specific legislation that helps ensure continued grazing and present use. (psm)
- Before range improvements and range improvement potential are used in alternative development criteria, they must clearly show a favorable cost-benefit analysis. (psm)
- Language that describes grazing rights, access, etc., following designation or nondesignation should be included in the description of each alternative. (psm)

Cultural Resources

- Give less emphasis to archaeological values in southern Utah. (psm)

ALTERNATIVE DEVELOPMENT--OTHER

Recreation

- Recommend areas suitable for designation only if surrounding areas can stand increased wilderness/recreation use. (psm)
- Recommend areas unsuitable if increased use could destroy wilderness values. (psm)
- Recommend areas suitable for designation only if significant need and potential use are documented. (psm)

Wilderness

Wilderness Values

- Areas designated should have at least one good asset or a combination that equals one good asset for wilderness. (ind)
- Designate only those portions of WSAs which have high wilderness values outweighing other nonwilderness use values. (psm)
- Do not designate defacto wilderness (topographically isolated or inaccessible) which has no foreseeable change/impact in its wilderness values. (psm)
- Do not make any recommendation until unassessed wilderness resource values have been determined. (psm)

Size

- Areas with less than 5,000 acres of outstanding wilderness values in manageable form should be recommended unsuitable. (lug)
- Recommend as suitable approximately the same percentage of area that is wilderness in adjoining states. (psm)

Geographic Distribution

- Driving distance should not be a consideration in wilderness designation. (psm)
- Ranking WSAs should not be used as a means to delete areas. (psm)

Need for Wilderness

- If the resource and wilderness values could be preserved without designation (by other multiple-use management methods) the area should be recommended unsuitable (e.g., bison management in Mt. Ellen and Mt. Pennell may be more effective without designation). (psm)

Conflicts With Other Resources

- Any alternative considered should be based on resource consideration. (ind)
- The greatest value to the most people should determine the suitability recommendation. (psm)

Wilderness Review Process

- All WSAs, even those under appeal to IBLA, should be considered in the alternatives. (psm)
- The Wilderness Act and FLPMA should be followed to the letter in development of alternatives and recommendations for suitability for wilderness designation. (psm)
- Alternatives in the Draft EIS should not be based on a percentage or quota system. Such an approach forgets that the function of the study phase (Draft EIS analysis) is to evaluate the suitability of each WSA based on its own characteristics and values. (ind)

Access

- Only the most inaccessible areas (where terrain limits access) should be recommended as suitable. (psm)
- The areas should be developed like national parks for greater public access and appreciation. (lug)

Conflicts With Other Resources

- Any alternative considered should be based on resource consideration. (ind)
- If designation would preclude access by anyone (aged, handicapped, etc.), recommend the area as unsuitable. (psm)
- Wilderness should be accessible to senior citizens. (psm)

Land Use and Land Use Plans

- Selection should be made considering the quantification of multiple use of all resources and special features. (lug)

Economics

- The economic values of wilderness designation should be analyzed, in addition to wilderness values. Those with a positive cost/benefit ratio should be designated. (psm)
- What would BLM budgetary needs be under each alternative? (lug)

Social and Public Attitudes

- Consider local, State, and Federal attitudes toward wilderness designation. (psm)
- Choose only WSAs that have local support. (psm)
- The commodity economic values foregone because of wilderness designation should be analyzed in addition to the wilderness values gained. (lug)

Manageability

- Only designate those areas that are self-protective. (psm)
- Do not designate areas as wilderness if hazards are present. (psm)
- An alternative based on manageability should be developed. (lug)
- Each alternative should be of a site specific nature (i.e., designate 100 percent of some WSAs with wilderness characteristics and no major conflicts if only a small portion which would be difficult to manage exhibits wilderness characteristics; do not designate some others). (lug)
- Areas recommended for designation should be manageable, unencumbered by lands not under Federal control. (lug)
- All manageable WSAs should be recommended suitable for designation. (psm)
- WSAs should be merged and clustered. (psm)
- Certain WSAs should be transferred to other agencies. (psm)
- If manageability can be resolved, the area should be designated. (psm)
- Boundary adjustments should be used to enhance manageability. (psm)
- If the area could not be managed to preserve its wilderness characteristics, it should not be designated. That does not, however, preclude study of any/all areas with potential for impairment. (lug)
- A WSA should not be included in a wilderness designation alternative if predator control is precluded, and if it does not allow control of noxious and/or poisonous weeds. (psm)

Interagency Consultation and Coordination

- Council of Environmental Quality regulations (40 CFR 1502.14[c]) require an EIS to "include reasonable alternatives not within the jurisdiction of the lead agency." Considering the likely passage of Project BOLD, the EIS should include an alternative that redraws all WSA boundaries as if State sections were BLM land. (ga)
- WSAs adjacent to national parks should be transferred to those parks. (ind)
- Emphasis for designation should be given to WSAs adjacent to other wilderness proposals (FS, NPS, etc.). (psm)
- San Rafael Swell WSAs (WSAs 59-64) should be made into a national park. (ind)

ALTERNATIVE DEVELOPMENT-OTHER

- Areas with non-Federal inholdings or where access to non-Federal areas outside the WSA would be affected should not be designated wilderness. (psm)
- Exclude State land from wilderness designation. (ind)
- Do not designate anything next to national parks. (psm)

Miscellaneous Criteria

- The following is a list of alternatives suggested for consideration in the EIS:
 1. No wilderness;
 2. No resource conflict;
 3. No manageability conflict;
 4. Current SSA recommendations;
 5. Revised SSA recommendations (agency preferred); and
 6. All wilderness. (psm)
- Theme alternatives would be more appropriate and more easily understood by the public. Such themes could maximize a resource value or combination of resource values (i.e., energy development alternative, recreation alternative, etc.). (ind)
- There is concern in development of alternatives. Setting up any alternative to arrive at a pre-determined conclusion (such as a certain percentage of WSA acreage) would constitute a violation of the NEPA process. Alternatives are intended only to make certain that all possibilities and that all issues have been analyzed before a final decision. (lug)
- It is proposed that an alternative be constructed using the following dichotomous key:
 - 1—Area has no resource conflicts.....recommend for wilderness
 - 1—Area has some resource conflicts.
 - 2—Benefit/cost ratio of accommodating conflicting resources not clearly greater than 1.....recommend for wilderness.
 - 2—Benefit/cost ratio of accommodating conflicting resources clearly greater than 1.
 - 3—Area has minor/moderate resource conflicts.....recommend for wilderness.
 - 3—Area has major resource conflicts.
 - 4—Wilderness values outweigh net conflicting values.....recommend for wilderness.
 - 4—Wilderness values clearly less than net conflicting values.....recommend for nonwilderness. (lug)

- ACEC designation would apply for those areas with somewhat lower wilderness attributes and/or higher resource conflicts. (ind)
- A true wilderness area should have characteristics unique to a certain part of the country. It should have relatively restricted access and be previously undisturbed. Wilderness designation should not be just a modified public use program to eliminate motor vehicle use. Livestock grazing should be absent. (ind)
- Selection should be made on the quantification of all resources and special features. (psm)
- All WSAs should be designated wilderness unless:
 - A. There is a preponderance of evidence that the mineral values of the WSA cannot be equaled from any non-WSA or it is proven beyond a reasonable doubt that the mineral values in a WSA are unique to that WSA.
 - B. There are valid existing claims and leases. All mineral claims/leases that might disqualify a WSA from wilderness designation must be proven to have valid recording, locations, and maintenance. Some 19 million acres are available to leasing and mining; a wilderness alternative including all 73 qualified areas, plus any appeals, would limit mineral development in approximately 3 million acres, leaving 6 times that amount open.
 - C. There is proof beyond reasonable doubt of the significance of mineral deposits. What are the criteria for a "significant" deposit? Is it significant to the American public or a limited number of investors? Are the mineral values more significant than values retained by wilderness protection? Is development supported by an economic analysis?
 - D. There is reasonable proof and evidence of the meaning of "potential" in respect to mineral/oil and gas values. Has there been an economic analysis?
 - E. It is proven beyond a reasonable doubt that any right-of-way that disqualifies a WSA is valid and necessary and of greater good and economic benefit than the loss of wilderness values. Is the cost/benefit analysis favorable to the public?
 - F. It is proven beyond a reasonable doubt that ORV conflicts cannot be resolved by use of equivalent non-WSA sites.
 - G. It is proven beyond a reasonable doubt that chainings, range and vegetation manipulations and improvements and

other potential range and water improvement conflicts within WSAs are economically and ecologically sound and of greater benefit than values foregone by nondesignation of wilderness.

- H. It is proven beyond a reasonable doubt that the firewood-gathering conflicts in a WSA cannot be resolved by use of equivalent areas on non-WSA land.
 - I. It can be proven that hunting conflicts with wilderness designation. There is considerable support of the philosophy that roadlessness improves hunting values. Hunting by horseback or foot is considered a desirable experience by many hunters.
 - J. It can be proven beyond a reasonable doubt that road building, which would disqualify an area from wilderness designation, is economically and ecologically sound and of greater benefit to the public than the value of the area as it exists.
 - K. It is proven beyond a reasonable doubt that there are no other limits that would disqualify a conflict with wilderness. An apparent conflict between wilderness and development (e.g., coal) might be resolved by other limits, such as air or water standards. Wilderness should not be used as an excuse when there are other reasons to question the apparent conflicts with wilderness designation.
- The following should be considered in alternative development and wilderness designation: (1) those areas that do not have substantial resource conflicts should be designated; (2) a substantial resource conflict might be a necessary mineral resource that may be economically and efficiently recovered; (3) a few cows more or less is not significant; and (4) manageability and access should be taken into account but should not override high wilderness values. (ind)

Examples of WSAs Meeting Given Criteria

- An alternative should be developed using the following criteria:
 - A. There should be no mineral conflicts with other uses.
 - B. There should be outstanding opportunities for solitude and recreation.
 - C. There should be special features.
 - D. There should be high quality naturalness.
 - E. The area should be adjacent to national parks, NRAs, other wilderness areas, or WSAs. The following WSAs meet one or

ALTERNATIVE DEVELOPMENT--OTHER

more of the above criteria: Rockwell, Cougar Mountain, Red Mountain, Cottonwood Canyon, Moquith Mountain, Scorpion, Escalante Canyons Tract 5, Mt. Pennell, Mule Canyon, Mud Springs Canyon, and Parunuweap Canyon. (ind)

- The following are criteria that should be used in developing alternatives. WSAs should have: limited human imprints; outstanding supplementary values (i.e., cliff dwellings); substantial local benefits (dollars); primitive surroundings; and lack of development potential for minerals. Examples of such WSAs are: Grand Gulch Complex, Dark Canyon Complex, Fish Creek Canyon, and Road Canyon. (ind)
- Cedar Mountains, French Spring-Happy Canyon, and Fish Springs WSAs should not be designated. (ind)
- In the Grand Gulch Complex ISA, only Grand Gulch Canyon should be designated, not mesa tops. In the Dark Canyon Complex ISA, the lower part (canyon only) should be designated. (psm)
- About 39 percent of WSAs should be designated. The following criteria should be followed: (1) there should be no ORV conflicts (except Desolation Canyon); (2) Kaiparowits coal must be mined; and (3) the Henry Mountains should be deleted. (ind)
- The following WSAs and ISAs are recommended: Deep Creek Mountains, Deep Creek, Canaan Mountain, Parunuweap Canyon, Paria-Hackberry, Wahweap, The Cockscomb, Swasey Mountain, Wah Wah Mountains, Howell Peak, Notch Peak, Dirty Devil, Horseshoe Canyon (South), Horseshoe Canyon (North), Fiddler Butte, Turtle Canyon, Desolation Canyon, Floy Canyon, Indian Creek, Butler Wash, Mancos Mesa, Road Canyon, Fish Creek Canyon, Phipps-Death Hollow, North Escalante Canyons/The Gulch, Grand Gulch Complex, and Dark Canyon Complex. (ind)
- All 73 of the WSAs plus areas rejected by the BLM (Sweet Alice Canyon, Harmony Flat, Arch Canyon, and Six Shooter Peaks) should be reassessed for wilderness suitability. (ind)
- Language that describes grazing rights, access, etc., following designation or non-designation should be included in the description of each alternative. (psm)
- A WSA should not be included in a wilderness designation alternative if (1) designation would preclude the use of tax dollars (already

allocated) to develop forage plants, new technologies, range improvements, etc.; (2) if it would exclude cost-effective water developments, chainings, and seedings that could be necessary to perpetuate the exiting environment and enhancement of forage for livestock and wildlife; (3) if it would not allow range management and development potential to be maximized; (4) if it would preclude regular maintenance, where necessary, of existing range improvements with heavy equipment (e.g., Grand Gulch Complex ISA); and (5) if there is arable land with agricultural potential present within the WSA (e.g., Grand Gulch Complex, 204, 201, and 205B). (psm)

- Designate only those areas with unique/exceptional wilderness values that are significantly different from areas already being protected (i.e., national parks, designated wilderness) (e.g., North Stansbury Mountains WSA). (psm)
- Recommend as unsuitable areas where solitude is degraded by sights and sounds (Air Force flights—Cedar Mountain and Carcass Canyon WSAs, highway—Fish Springs, North Stansbury Mountains, and Deep Creek Mountains WSAs). (psm)
- Compromise alternatives should also be considered in the Statewide EIS (i.e., recent compromise on the Arizona Strip). (ind)
- Boundaries should be drawn so that use pressure is equally distributed (e.g., Desolation Canyon boundaries would place use pressure west of the river). (psm)

Astragalus henrimontanensis

- When developing wilderness designation alternatives, consideration should be given to how fire would be controlled and its possible effects on adjacent property and FS land. Where a hazard exists, it should be used as criteria for dropping a WSA from a wilderness designation alternative (e.g., Dark Canyon WSA). (psm)
- Recommend areas suitable only if they would be manageable as wilderness under current budgets (e.g., ORVs would not degrade values; Parunuweap Canyon WSA is not manageable). (psm)
- The North Stansbury Mountains and Deep Creek Mountains WSAs will remain unchanged if recreational vehicle use is restrained. (ind)
- The following WSAs should be recommended as suitable: Wah Wah Mountains, King Top, Desolation Canyon, Deep Creek Mountains (unique values), Cockscomb, San Rafael Reef.
- Designate Mt. Ellen-Blue Hills (36); Bull Mountain (37); Dirty Devil (38); Horseshoe Canyon (South) (39); French Spring-Happy Canyon (40); Fiddler Butte (41); Mt Pennell (42); Mt Hillers (43); Mancos Mesa (45); Grand Gulch Complex ISA (46); Road Canyon (47); Fish Creek Canyon (48); Mule Canyon (49); Cheesebox Canyon (50); Dark Canyon Complex (51); Butler Wash (52); Bridger Jack Mesa (53); Indian Creek (54); Phipps-Death Hollow ISA (29); Steep Creek (30); North Escalante Canyons/The Gulch ISA (31); Scorpion (33); and Escalante Canyons Tract 5 ISA (34). (ind)
- The following WSAs satisfy all criteria for wilderness designation: North Stansbury Mountains, Cedar Mountains, King Top, Wah Wah Mountains, Cottonwood Canyon, Deep Creek, Canaan Mountain, Cockscomb, Mt. Ellen-Blue Hills, Bull Mountain, Dirty Devil, Little Rockies, Grand Gulch, San Rafael Reef, Desolation Canyon, Westwater Canyon, and Winter Ridge. (ind)
- The following WSAs and ISAs should be recommended for wilderness designation: Mule Canyon, Grand Gulch Complex, Road Canyon, Fish Creek, Wah Wah Mountains, Muddy Creek, San Rafael Swell, Dirty Devil, Negro Bill Canyon, Paria-Hackberry, Jack Canyon, Desolation Canyon, Turtle Canyon, Floy Canyon, Winter Ridge, Coal Canyon, Spruce Canyon, Flume Canyon, Westwater Canyon, Canaan Mountain, Winter Ridge, North Fork Virgin River, Deep Creek, LaVerkin Creek, Parunuweap Canyon, Orderville

Canyon, Cottonwood Canyon, Scorpion Canyon, Desolation Canyon, and North Escalante Canyons/The Gulch. (psm)

- The BLM should support a high wilderness alternative that includes areas where designation of wilderness would have minor socio-economic impacts on local economies and no serious resource conflicts. (ind)
- WSAs with no conflicts or manageability problems should be recommended as suitable for designation. (ind)
- A partial alternative including the badlands and Burning Hills should be considered. (psm)
- The following WSAs should be recommended suitable as partials: Deep Creek Mountains, Howell Peak, Notch Peak, Wah Wah Mountains, North Stansbury Mountains, Westwater Canyon.

The following WSAs should be recommended as unsuitable: Fish Springs (mineral), Cedar Mountains, Rockwell (ORV), Swasey Mountain (mineral), Conger Mountain, King Top, Notch Peak (mineral), Deep Creek Mountains (mineral), Howell Peak (mineral), Winter Ridge, Jack Canyon, and Bridger Jack Mesa. (psm)

- There should be one alternative that includes all WSAs not involving oil or mineral conflicts. In this alternative, the only WSAs excluded should be those with oil/minerals that are economically feasible for development, based on the best information available. Examples of such WSAs are Red Mountain, Parunuweap, Cheesebox Canyon, and Moquith Mountain. (ind)
- The following alternative (refer to Table 1) has been submitted for analysis in the Statewide Wilderness EIS. Rationale has been submitted for each WSA as to why a certain recommendation was made. (Maps were also provided, but are not reproduced here.) (ga)

The Barracks, Parunuweap Canyon WSA

TABLE 1

WSA Name	Total WSA Acreage	Recommended Suitable (acres)
North Stansbury Mountains	10,480	8,700*
Cedar Mountains	50,500	0
Deep Creek Mountains	68,910	50,984
Fish Springs	52,500	33,840
Rockwell	9,150	0
Swasey Mountain	49,500	34,500
Howell Peak	24,800	14,800
Conger Mountain	20,400	0
Notch Peak	51,130	28,000
King Top	84,770	0
Wah Wah Mountains	42,140	42,140
Cougar Canyon	15,968	0
Red Mountain	18,250	0
Cottonwood Canyon	11,330	0
LaVerkin Creek	567	0
Deep Creek	3,320	0
North Fork Virgin River	1,040	0
Orderville Canyon	1,750	0
Parunuweap Canyon	30,800	7,400
Canaan Mountain	53,600	38,000
Moquith Mountain	14,830	0
The Blues	19,030	0
Mud Springs Canyon	38,075	0
Paria-Hackberry	135,822	59,270
The Cockscomb	10,080	5,100
Wahweap	134,400	65,880*
Burning Hills	61,550	0
Death Ridge	62,870	0
Phipps-Death Hollow ISA	42,731	39,216*
Steep Creek	21,896	18,350*
North Escalante Canyons/The Gulch ISA	119,300	89,556*
Carcass Canyon	46,711	0
Scorpion	35,884	0
Escalante Canyons Tract 5 ISA	760	0
Fifty Mile Mountain	146,143	98,110*
Mt. Ellen-Blue Hills	58,480	57,840*
Bull Mountain	11,800	11,800
Dirty Devil	61,000	67,000*
Horseshoe Canyon (South)	38,800	36,600
French Spring-Happy Canyon	25,000	0
Fiddler Butte	65,000	32,700
Mt. Pennell	27,300	0
Mt. Hiller	20,000	17,000
Little Rockies	38,700	38,700
Mancos Mesa	51,440	46,120
Grand Gulch Complex ISA	105,520	105,520
Road Canyon	52,420	45,720*
Fish Creek Canyon	46,440	35,220
Mule Canyon	5,990	5,990**
Cheesebox Canyon	15,410	15,410**
Dark Canyon Complex ISA	68,030	68,030

TABLE 1 (concluded)

WSA Name	Total WSA Acreage	Recommended Suitable (acres)
Butler Wash	22,030	24,190
Bridger Jack Mesa	5,290	0
Indian Creek	6,870	6,870
Behind the Rocks	12,635	12,635
Mill Creek Canyon	9,780	0
Negro Bill Canyon	7,620	0
Horseshoe Canyon (North)	20,500	20,500
San Rafael Reef	55,540	59,170
Crack Canyon	25,315	25,335
Muddy Creek	31,400	31,400
Devils Canyon	9,610	0
Sids Mountain	80,530	78,408
Mexican Mountain	59,600	46,750
Jack Canyon	7,500	0
Desolation Canyon	289,650	242,000
Turtle Canyon	33,690	33,690
Floy Canyon	72,605	23,140
Coal Canyon	61,430	0
Spruce Canyon	20,350	0
Flume Canyon	50,800	0
Westwater Canyon	31,160	26,000
Winter Ridge	42,462	0
Totals	3,138,684	1,841,584

*Would result in a new alternative analysis or minor boundary modification.

**Reversal from BLM's preliminary planning suitability recommendation.

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