



February 6, 2008

Bureau of Land Management
Monticello Field Office
DRMP Comments
P.O. Box 7
Monticello, Utah 84535

To whom it may concern:

I am writing on behalf of Glen Canyon Institute (GCI), to comment on the **Monticello Field Office Draft Resource Management Plan and Environmental Impact Statement (DRMP)**. GCI is a nonprofit organization that represents more than 1,000 members in Arizona and Utah, throughout the Colorado Basin, and across the United States and beyond. Our members regularly visit and enjoy the ecological, scenic, and recreational values of the lands managed by the Monticello Field Office. Our organization has a significant interest in the sustainable management of these lands to ensure that they are kept unimpaired for the enjoyment of future generations. We appreciate the opportunity to provide our comments on the DRMP.

GENERAL DISCUSSION

The Monticello DRMP area covers 1.8 million acres of lands in southeastern Utah – stretching from Glen Canyon National Recreation Area (NRA) on the West to the Colorado state line on the East. This plan will have a major impact on these vast BLM lands and also on the adjacent Glen Canyon NRA, Canyonlands National Park, Natural Bridges National Monument, and Hovenweep National Monument, all within the Colorado River watershed.

The Monticello DRMP is a culmination of several years of evaluation by the BLM of existing and planned resource activities in the planning area. Since the original RMP was developed, there has been a huge increase in oil and gas development, mineral exploration, and the use of off-road vehicles (ORVs) and mountain bikes. Simply stated, our public lands have been discovered, for not only their beauty and ecological importance, but also as places that can be exploited due to lax rules, regulations, and enforcement. Many of our BLM public lands will suffer mounting damage in the years ahead, unless they are given permanent protection.

A study by the Sonoran Institute in 2004¹ articulated the important role that protected public lands have on prosperity in the West. The demographics of the region are changing dramatically – today the West is one of the fastest growing areas of the nation. When asked

¹ See Sonoran Institute, *Prosperity in the 21st Century West: The Role of Protected Public Lands* (2004).

why people are moving to the West, one of the most important reasons they cite is access to public lands and the recreation opportunities that they provide. GCI does not expect that all resource industries will disappear from public lands. However, we do expect that the BLM require these industries to operate in a responsible manner, restricted to areas where they will have the least impact on the living systems and resources that are important to ecological integrity, sustainability, and value of our public lands.

In contrast to the rapidly evolving public expectations for the management of our public lands, the BLM's Preferred Alternative for the Monticello planning area – Alternative C – is a throwback to the short-sighted exploitation of the past. Alternative C would turn this wild, spectacular landscape into an active industrial zone. Oil and gas drilling, mining, ORVs, and other destructive uses would dominate the region. Wilderness, wildlife habitat, watersheds, and cultural values would receive little protection.

For these reasons, Glen Canyon Institute strongly opposes Alternative C. Our trustees, staff, and members spend considerable time in the Monticello planning area. Our experiences are from direct exposure to the landscape and the knowledge of the critical resources and habitats that exist in the planning area. It is obvious to us that Alternative C fails to protect these nationally, and internationally, significant values. As a result, it fails to honor the intent of the laws that direct the activities of the BLM and Department of the Interior.

Glen Canyon Institute believes that the BLM can – and must – do better. The underlying assumption of Alternative C – that the public supports continued, unbridled development of our natural heritage – is wrong. The American people deserve, and increasingly demand, a sustainable vision and plan for the future of our public lands. We urge the BLM to reject Alternative C, and to use Alternative E, the enhanced wilderness alternative, as a more appropriate basis for developing a balanced and sustainable Monticello Final Resource Management Plan (FRMP).

SPECIFIC COMMENTS

The following comments summarize the major flaws in Alternative C, the Preferred Alternative in the Monticello DRMP, and our recommendations for remedying these flaws in a significantly revised FRMP.

A. Climate Change

The Secretary of the Interior, who oversees the BLM, considers global climate change so important that he has created a special Interior Department Climate Change Task Force to consider this pervasive issue.² This action shows that even the Bush administration – which has actively weakened many environmental laws – cannot ignore the potential impacts of climate change. There is growing scientific evidence that climate change will have major impacts on the hydrology and ecosystems of the Monticello planning area and the entire West. For example, a February 2007 National Research Council report concludes that climate change is altering the hydrology of the Colorado River Basin³. This has been reiterated most recently in

² See http://www.doi.gov/news/07_News_Releases/070601.html

³ See http://www.nap.edu/nap-cgi/execsumm.cgi?record_id=11857

an article in *Science* magazine that identifies that considerable change will occur to the climate and hydrologic processes that impact the Colorado Plateau.⁴ Moreover, many activities proposed by the BLM, such as oil, gas, and mineral extraction, ORV use, and livestock grazing, emit greenhouse gases that promote climate change. Despite this, other than one oblique reference to fire (p. 4-11), the Monticello DRMP completely ignores climate change. This calls into question the entire basis of this plan, which is meant to provide management guidance for the next 20 years.

Changes Needed in the Final Resource Management Plan

1. Significantly revise the DRMP to address climate change across all resource and management categories and on all levels.
2. Include a full analysis of the potential impacts of climate change on the natural resources of the planning area, including soils, precipitation and water flows, vegetation, wildlife and wildlife habitat, and aquatic communities.
3. Include a full analysis of the potential impacts on climate change of emissions of greenhouse gases resulting from current and potential consumptive activities such as oil and gas, coal, oil shale and tar sands, and mineral extraction; ORV use; and livestock grazing.
4. Evaluate changes in the hydrology of the Colorado River Basin resulting from global climate change, as identified in the National Research Council report.

B. Wilderness Study Areas

There are 13 Wilderness Study Areas (WSAs), totaling 386,027 acres, on the lands encompassed by the Monticello DRMP (p. 4-351, 4-415). The agency has a legal mandate to preserve these areas until the Congress decides on their disposition (they are included America's Red Rock Wilderness Act). The DRMP violates this mandate by designating dozens of miles of off-road vehicle (ORV) routes in WSAs (p. 2-55). The BLM cannot unilaterally ignore congressional direction without prior approval.

Changes Needed in the Final Resource Management Plan

1. Ban ORVs and all other activities that would not be allowed in designated wilderness areas, from all identified WSAs until the Congress and the American people have the chance to fully consider wilderness legislation.
2. Ensure that ORV closures include physical barriers to entry and are adequately patrolled, managed, and enforced.
3. Provide a complete review of the relevant legal and administrative mandates related to the management of WSAs in Chapter 1 of the FEIS, and an explanation of how the BLM is obeying these mandates.

C. Non-WSAs with Wilderness Characteristics

The BLM has identified 29 areas encompassing 582,360 acres of “non-WSA lands with wilderness characteristics” (emphasis added; p. 2.6, 4-149, 4-150). Many of these areas about the

⁴ See <http://www.sciencexpress.org/5April2007>

boundary of Glen Canyon NRA, other national parks, and WSAs, and are included in America's Red Rock Wilderness Act (Map 28). The DRMP would open virtually all of these potential wilderness areas to full-scale industrial exploitation (p. 2-20, 4-165, 4-187 to 189, 4-193, 4-217 to 219).

Changes Needed in the Final Resource Management Plan

1. Administratively protect all 29 non-WSA areas identified as having wilderness characteristics, to safeguard their ecological, cultural, and recreational values, until wilderness designation can be resolved by Congress. To not do so would be to violate the intent and objective of the proposed legislation and intent of BLM administrative direction.
2. Provide the same level of protection for these areas that is provided to WSAs (including banning ORVs, as recommended above), until the Congress makes a final decision on wilderness legislation.

D. Wild and Scenic Rivers

The BLM has identified 12 river segments totaling 92.4 miles that are eligible for National Wild and Scenic River designation by the Congress (p. 2-5, 2-46, 2-47). There is ample documentation in Appendix H to justify recommending all of these river segments (p. H-91 to H-103). However, the DRMP recommends only 3 river segments totaling 18.4 miles – just one-fifth of eligible mileage – for Wild and Scenic River designation (pp. 2-5, 2-46, 2-47, 4-408 to 4-411).

Changes Needed in the Final Resource Management Plan

1. Recommend as suitable for protection all 12 segments of streams and rivers, totaling 92.4 miles, that are identified in Appendix H as having one or more “outstandingly remarkable values” and eligible for further consideration as Wild and Scenic Rivers in the RMP.
2. Develop cooperative programs with conservation groups and the Utah DNR to scientifically document the “outstandingly remarkable values” for the 12 river segments and make decisions based on complete and objective data, which are not now available.
3. Complete adequate scientific studies to identify the relationships between the proposed Wild and Scenic Rivers and their importance to species on the endangered species list.
4. Identify a clear process on how the suitability of the 12 segments will be reviewed prior to final determination of their management status.

E. Areas of Critical Environmental Concern (ACECs)

The Area of Critical Environmental Concern (ACEC) land classification is designed to “*protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, other natural systems or processes.*” (p. 2-34). The BLM has identified 12 areas, totaling 521,141 acres, as eligible for ACEC designation (p. 2-4, 2-34 to 2-45 and 4-416, H-2 to H-66) The DRMP would designate just 3 small ACECs, totaling 76,764 acres – an 84 percent reduction from the current plan (p. 2-4, 4-416). In addition, 4 complete areas (Canyonlands, Monument Canyon, Redrock Plateau, and White Canyon) and 1 partial area (San Juan River) totaling 661,598 acres that were nominated by SUWA, but rejected (p. H-2), are given no protection

under the DRMP. These areas are adjacent to Glen Canyon NRA, other national park areas, WSAs, eligible Wild and Scenic Rivers, and other lands with important natural, cultural, and recreational values and their management has a direct impact on those adjacent lands.

Changes Needed in the Final Resource Management Plan

1. Designate all 12 areas identified as potential Areas of Critical Environmental Concern in Appendix H (p. H-2 to H-66). The analysis in this appendix provides strong justification for the designation of these areas as ACECs.
2. Protect all lands in the Canyonlands, Monument Canyon, Redrock Plateau, San Juan River, and White Canyon nominated, but rejected ACECs (p. H-2) that drain into the watershed that feeds the Colorado River. Implement sediment control and management to ensure no loss of critical habitats or decrease in water quality characteristics.
3. Establish a moratorium on ORV use, oil and gas drilling, mineral extraction, and other destructive activities in the Canyonlands, Monument Canyon, Redrock Plateau, San Juan River, and White Canyon areas, which were nominated, but rejected ACECs (p. H-2). This moratorium should continue until adequate studies can be completed and publicly reviewed to determine the importance of these lands to the natural, cultural, and recreational values of Glen Canyon NRA, other national park areas, WSAs, eligible Wild and Scenic Rivers, and other sensitive lands.
4. Any of the areas discussed in item 3 that are found to be important to the natural, cultural, and recreational values of adjacent sensitive lands should be designated as ACECs.

F. Travel Management

The BLM acknowledges that there is growing concern about the use of “off-highway vehicles” (more commonly known as off-road vehicles or ORVs) in the planning area (p. 4-469). According to the BLM, the impacts of ORVs “include (and are not limited to) engine noise, air pollution from exhaust emissions, impacts to erodible [sic] soils, the potential for travel-related stream sedimentation and non-point source water pollution, potential impacts to federally listed and sensitive wildlife species habitats, and potential impacts to historic and prehistoric archaeological sites” (Ibid). Instead of seriously addressing these impacts, the Monticello DRMP designates a staggering 1,947 miles of ORV routes (p. 4-479) spread over 1.4 million acres (p. 4-476). Many of these routes are adjacent to Glen Canyon NRA, other national park units, and proposed wilderness areas (page 4-193, Map 51). If these ORV routes were laid out in a straight line, they would reach from Salt Lake City to New York City. The DRMP fails to consider a reasonable range of alternative Travel Management alternatives – contrary to the mandate of the National Environmental Policy Act (NEPA). Even Alternative E, which closes the most ORV routes of any alternative, includes only a small reduction in the vast motorized route network.

Changes Needed in the Final Resource Management Plan

1. Reduce dramatically the number of motorized ORV routes, especially in areas that have important natural values and occurrence of listed species. Even reducing the current motorized route mileage in half would leave more than 1,000 miles of roads – far too many to ensure the integrity of the area or to be managed and controlled by the limited BLM staff.

2. Any designated routes that dead-end at or near the boundary of Glen Canyon NRA, other national park areas, WSAs, non-WSAs with wilderness characteristics, qualified Wild and Scenic River segments, designated and nominated ACECs, and other important natural areas should be physically and effectively blocked and signed, and those closures enforced. To the extent possible, these areas should be identified for landscape restoration.
3. Implement aggressive management of ORV use to minimize violation of existing BLM and DOI standards for the protection of protected landscapes.
4. Do not allow ORV access to any WSAs and other areas that are pending discussions in Congress associated with America's Red Rock Wilderness Act. It is inappropriate to allow motorized access to these lands until Congress has an opportunity to debate and discuss their final disposition.
5. Implement controls to ensure that ORV access to these areas is prevented.
6. Do not allow ORV users to "cut across" sensitive areas to access other use areas.
7. Areas that are damaged by ORVs should be identified and publicized as examples of disrespect for public lands that cannot and will not be tolerated.

G. Special Status Species

The BLM defines "special status species" as "*those plant and wildlife species listed as endangered, threatened, proposed, and/or candidate under the Endangered Species Act, as well as those plant species listed or proposed as sensitive by the BLM*" (p. 3-140). The DRMP notes that a large number of special status species may occur in the Monticello planning area (p. 4-417). The document acknowledges that livestock grazing, oil and gas drilling, mining, and off-road vehicles can have significant negative impacts on native wildlife (p. 4-420 to 4-427). Finally, the DRMP states that "*Special Designation areas, such as ACECs, WSAs, and WSRs would generally reduce long-term impacts to special status species that occur within their boundaries*" (p. 4-424). Unfortunately, the DRMP has rejected this approach, instead choosing a flawed strategy of protecting only a few tiny areas for single species (p. 4-435, 4-438) while failing to designate adequate protected areas that do not allow ecologically damaging activities. This appears to be a direct avoidance of the requirements of the Endangered Species Act.

Changes Needed in the Final Resource Management Plan

1. Implement and ensure enforcement of specific management controls on all WSAs, non-WSAs with wilderness characteristics, qualified Wild and Scenic River segments, and designated and nominated ACECs with existing or potential habitat for species listed under the Endangered Species Act. This includes seasonal closures, removal from ORV use, watershed level protections, and identified habitat restoration programs.
2. Implement and ensure enforcement of specific management controls on other areas with existing or potential habitat for species listed under the Endangered Species Act. This includes seasonal closures, removal from ORV use, watershed level protections, and identified habitat restoration programs.
3. Complete and implement a habitat restoration program for native plants listed as threatened or endangered under the Endangered Species Act.
4. Manage all lands in the planning area to further the congressionally mandated goals and requirements of the Endangered Species Act, Clean Water Act, and Clean Air Act. Do not allow any activity that would make existing problems worse.

5. Develop a realistic Recovery Implementation Plan and implementation strategy for protecting and restoring habitats for listed species.

H. Oil, Gas, and Minerals

Oil, gas, and mineral extraction can cause massive destruction of ecological, cultural, and recreational values. Despite this, the Monticello DRMP classifies 1.4 million acres (78 percent of the total area) open to oil and gas leasing (p. 4-98, 4-119) and 1.7 million acres (94 percent) open to mining (p. 2-20, 4-98, 4-121) – including most of the lands next to Glen Canyon NRA and other national park areas (Maps 20 & 25). This means that under the DRMP, virtually the entire Monticello planning area would be open to oil and gas drilling, mining, and other extractive development.

Changes Needed in the Final Resource Management Plan

1. Ban oil, gas, and mineral exploration and development in all WSAs, non-WSAs with wilderness characteristics, qualified Wild and Scenic River segments, designated and nominated ACECs, and lands near Glen Canyon NRA and other national parks, and other areas included in the pending America's Red Rock Wilderness Act. These areas have critical ecological, visual, and recreational values that should not be degraded by any kind of development.
2. Implement stipulations that require that oil and gas development be managed to reduce multiplication of sites, focusing development on existing areas where it can be managed by the existing BLM staff. Ensure that stipulations are based on scientifically valid information and methods.
3. Where oil and gas development projects are allowed, ensure that they minimize their footprint on the ecological integrity of the planning area. This includes strict control of access roads, well pad siting, support areas for storage, and allowance of dogs on drill rigs and company vehicles.
4. Implement stringent stipulations to ensure that oil and gas development pays the appropriate price for impacting the resources. This includes protecting access points and watersheds, and preventing an increase in exotic plant incursions in development areas. For each project, a trust fund established prior to drilling that includes funds in an amount necessary for recovery of the site to pre-drilling standards after the completion of drilling and/or mining.

I. Livestock Grazing

Livestock grazing on BLM lands degrades soils, vegetation, wildlife habitat, air and water quality, and recreational values, and is heavily subsidized by taxpayer dollars. And yet, the DRMP allows grazing on 1.6 million acres, or 92 percent of the total planning area (p. 4-70, 4-79, 4-490 to 4-491). In fact, the BLM failed to consider any alternative plan with significantly fewer acres open to grazing – a clear violation of NEPA (p. 4-491).

Changes Needed in the Final Resource Management Plan

1. Phase out livestock grazing in all WSAs, non-WSAs with wilderness characteristics, qualified Wild and Scenic River segments, and designated and nominated ACECs.

2. Phase out livestock grazing on all lands with existing or potential habitat for species listed under the Endangered Species Act.
3. Work with grazing leaseholders to identify the ways and means to reduce seasonal impacts on BLM habitats and implement active programs for grazing land restoration.

J. Visual Resources

The Monticello DRMP would allow widespread degradation of the natural and cultural landscape. More than 1.2 million acres would be designated as VRM (Visual Resource Management) Class III and Class IV, which allow “*moderate to major impacts to scenic quality*” from “*surface disturbing activities.*” (p. 4-352). In other words, 69 percent of the landscape could be scarred – much of it permanently – by industrial activities – including potential wilderness areas and many of the lands adjacent to Glen Canyon NRA and other national park units (p. 4-210, Map 57).

Changes Needed in the Final Resource Management Plan

1. Manage WSAs, non-WSAs with wilderness characteristics, designated and nominated ACECs, and other lands included in the America’s Red Rock Wilderness Act as VRM Class I to “preserve the existing character of the landscape,” or VRM Class II to “retain the existing character of the landscape” until Congress has made a decision on this legislation.
2. Manage all qualified Wild and Scenic River segments and lands adjacent to Glen Canyon NRA and other national park areas as VRM Class I to “*preserve the existing character of the landscape.*”
3. Implement controls on oil, gas, and mineral development to restrict air pollution resulting from drilling, exploration, and production activities.
4. Create specific plans to be implemented to reduce the loss of visual integrity in the planning area.

K. Cultural Resources

The Monticello DRMP states, “*the planning area is known for its extraordinarily high density of cultural resources, particularly Anasazi sites, many of which are yet to be recorded*” (p. 1-4). Despite this, the DRMP allows oil and gas drilling, mining, ORV use, and livestock grazing over most of the planning area (p. 4-98, 4-119, 4-476, 4-490 to 4-491). Less than 1 percent of the area would be designated as Cultural Special Management Areas (CSMAs) to protect known concentrations these resources (p. 2-8 to 2-12, 4-39). The serious deficiencies of this management approach are clearly acknowledged: “*Because the location and nature of all cultural resources in the area under consideration are unknown, it is not possible to determine if there would be irreversible and/or irretrievable impacts to cultural resources and/or what they might be*” (p. 4-47).

Changes Needed in the Final Resource Management Plan

1. Protect non-WSAs with wilderness characteristics, qualified Wild and Scenic River segments, designated and nominated ACECs, lands near Glen Canyon NRA and other national parks, and other areas included in the pending America’s Red Rock Wilderness

Act from allow oil and gas drilling, mining, ORV use, and livestock grazing – which would also safeguard any cultural resources in those areas.

2. In areas where oil and gas drilling, mining, and other development activities are allowed, do not approve projects until a thorough cultural survey and analysis of the area has been completed.
3. Complete a cultural survey and analysis of all ORV routes and close any routes that run through areas with cultural sites.
4. Prohibit livestock grazing in any area with known or suspected cultural resources.

L. Public Comment Period

The BLM has issued six voluminous management plans in the last few months, the latest being the Monticello DRMP. Although it took years to prepare these documents, the public is given only 90 days to comment on these huge, detailed, and confusing plans. The Monticello DRMP comment period is grossly inadequate to provide meaningful public review and input – especially in light of multiple, overlapping plans issued by the BLM.

Changes Needed in the Comment Process

1. Extend the comment period for the Monticello DRMP by 60 days.
2. Issue a new public notice to ensure that citizens are aware of the extended comment period.
3. Hold public comment meetings in locations close to the Monticello planning area and in large population areas such as Salt Lake City.

SUMMARY

Glen Canyon Institute believes that Alternative C, the Preferred Alternative in the Monticello DRMP, is completely unacceptable and a new Preferred Alternative must be developed. The new alternative could be based on Alternative E, which is designed to “minimize human activities, offer more protection for wildlife and other natural resources, and favor natural systems over commodities development” and emphasize “protection of 582,360 acres of non-WSA lands with wilderness characteristics.” This is the minimum that needs to be done to create a Final Resource Management Plan that meets the ecological, cultural, recreational, and economic needs of the American people in the years ahead.

Again, thank you for the opportunity to comment on the Monticello DRMP.

Sincerely,

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