

Richfield BLM Field Office:

In reviewing the alternatives in your Draft Resource Management Plan /Draft Environmental Impact Statement (DRMP/DEIS); I feel that Alternative B is acceptable, provided that some minor changes are made related to access possibilities for personal, non-commercial rock and fossil collecting in the Final RMP. Alternative A is preferable in allowing more open areas for such collecting. I urge caution in selectively adopting portions of Alternatives C & D in the Final RMP/EIS, and I have pinpointed several specific sections of those alternatives that would adversely impact our hobby.

RECREATIONAL ROCKHOONDING:

I noted in the DRMP/DEIS the following paragraph:

*"3.4.6.3.5 OTHER MINERALS: Other mineral materials considered in Mineral Potential Report include oyster shell, petrified wood, jasper, agate, and chalcedony. Oyster shell from the Dakota Formation has been used for road surfacing in Wayne County. There is also interest in oyster shell for agricultural use. **It is considered unlikely that the other mineral materials considered will have development beyond hobby or casual use within the next 15 years.**" (my emphasis)*

Thus, hobby collecting of minerals by "Rockhounds" is recognized as a legitimate pursuit. My wife and I are in our 70's, and she in particular is unable to walk more than a very short distance from our truck to collect agate, petrified wood, onyx, minerals, etc to make into jewelry in our "Rockhounding" hobby. **Surely, as suggested for camping and parking in your alternatives, occasional travel off of designated routes to specific sites or deposits of collectable materials can be accommodated, perhaps one-quarter mile for a half day of collecting by individuals or organized Gem and Mineral Societies?**

AMATEUR PALEONTOLOGY:

In addition, I completely agree with the statement in Para. 4.3.6 *"In this manner, erosion is continually bringing new fossils to the surface even as it destroys what is presently exposed."* However, as Dr. Jim Kirkland (Utah State Paleontologist) will certainly agree, it is knowledgeable amateur paleontologists like myself that bring to his attention many of the new fossil finds in Utah. So the same recommendation regarding off road travel to mineral collecting sites equally applies to paleontological sites.

Unfortunately, at the end of that same paragraph, you stated ***"By definition, all vertebrate fossils are considered rare by BLM and impacts to these types of fossils are of greatest concern."*** (my emphasis) The marvelous fish fossils (certainly vertebrate) of the Green River Formation in Wyoming near Kemmerer are quarried in hundreds of tons each year on private and Wyoming State leased lands. Hardly rare! I also noted that Table 3-13 (Vol I, p. 3-26) "Geological Formations Present in the Planning Area" includes that same Green River Formation in the western portion of the RFO. I urge in the Final RMP you will keep that region available for myself and members of "Utah Friends of Paleontology" to explore.

OFF-HIGHWAY TRAVEL:

My first concern is with regard to mineral collecting in the Clay Point region south of the Henry Mountains. Alt. B Off-Highway designations on Map 2-14 and route designations shown on the CD Maps for "Notom Road" and "Hite" are acceptable. (But Alt A (Map 2-13) is preferable in the Final RMP in allowing more open areas for hobby mineral and invertebrate fossil collecting.) Typical GPS coordinates for collecting sites in the Clay Point region accessed from the Starr Springs camping area and the Notom Road/Burr Trail are:

- 37deg 41.75minN / 110deg44.78minW
- 37deg 44.11min N / 110deg52.81minW
- 37deg 46.50minN / 110deg44.27minW

There are numerous other GPS locations in the area, but these are typical for finding agate, petrified wood, coprolite, and invertebrate fossils.

However, Alt C and D Off-Highway "Closed" designations for the Clay point region on Map 2-15 and 2-16 and closed route designations shown on the CD Maps for "Notom Road" and "Hite" are unacceptably restrictive. See:

- (T34S: R10E, R11E, R12E)
- (T35S: R9E, R10E, R11E, R12E)
- (T36S: R9E, R10E, R11E, R12E)

The Alt. D proposal even closes the road from Utah State Hwy 276 to Starr Springs Campground, and the road from Starr Springs to the Notom/Burr Trail in these same sections. BLM can rest assured of an RS2477 fight and probable lawsuit if that alternative was adopted.

A second area of concern is in the "Last Chance" and "Mussentuchit" localities in regard to hobby mineral collecting. Alt A (Map 2-13) Off-Highway area is preferable in allowing more open areas for collecting. Alt. B Off-Highway designations on Map 2-14 and the route designations shown on the CD Map for "Fremont Junction" are also acceptable in the RFO portion, but we need to be assured of continuation into the Price Field Office routes for the Mussentuchit region, see:

- Richfield FO: T24S - R5E and T25S - R5E
- Price FO: T24S - R6E and T25S - R6E

Collecting sites at typical GPS coordinates in the Last Chance and Mussentuchit region for multicolored Agate are:

- 38deg 45.909minN / 111deg19.092minW
- 38deg 39.18minN / 111deg16.84minW

There are numerous other GPS locations in the area, but these are typical for finding agate and petrified wood.

However, Alt D Off-Highway "Closed" designations for the "Last Chance" region on Map 2-16 and closed route designations shown on the CD Map for "Fremont Junction" are unacceptably restrictive. Again see:

- Richfield FO: T24S - R5E and T25S - R5E
- Price FO: T24S - R6E and T25S - R6E

A third (there are many others) locality of concern in regard to mineral collecting is near Salina. Alt A Off-Highway designation (Map 2-13) is preferable in allowing more open areas for collecting. Alt. B Off-Highway designations on Map 2-14 and the route designations shown on the CD Maps for "Sevier River North" are also acceptable. My concerns are for collecting sites at typical GPS coordinates in the Salina and Aurora region for "Salina Blue Agate":

- 38deg 59.23minN / 111deg57.78minW
- 38deg 59.41minN / 111deg57.85minW

There are numerous other GPS locations in the area, but these are typical for finding agate and petrified wood.

However, Alt C and D Off-Highway "Closed" designations for the Salina / Aurora region on Map 2-15 and 2-16 and closed route designations shown on the CD Map for "Sevier River North" are unacceptably restrictive. See:

- T21S – R2W

AREAS OF CRITICAL ENVIRONMENTAL CONCERN:

Alternative B (Map 2-43) provides all the reasonable ACECs needed in the Final RMP. Alternatives C & D propose far too many marginal locations:

- Potential "Kingston Canyon" ACEC has a major highway running through its length, historically occupied with ranching and farming lands, and the Utah DWR is already doing a good job of managing the East Fork of the Sevier River. Riparian protection can be managed within existing processes.
- Potential "Sevier Canyon" ACEC has a major highway and a paved bicycle path running through its length, historically occupied with resort, ranching and farming lands, and the Utah DWR is already doing a good job of managing the Sevier River. Riparian protection can be managed within existing processes.
- Potential "Rainbow Hills" ACEC has a major highway running along its south edge, historically important for extraction of gypsum, and likely to be explored for oil and gas.
- Potential "Special Status Species" ACEC seems to be a catchall for anything the environmentalists missed in the rest of the potential ACECs, and is obviously too expansive.

WILD AND SCENIC RIVERS:

Alternative B provides all the reasonable WSRs needed in the Final RMP.

Alternatives C & D propose far too many marginal locations and BLM's rational for not including them in Alt B is correct:

- Potential "Fremont River Below Capitol Reef NP to Caineville Ditch" WSR has a major highway running through its length, and is historically occupied with ranching and farming lands. It also is controlled by dams at Mill Meadow and Johnson Reservoir; otherwise the river would be free-flowing only when hit by a flash flood (an ephemeral stream). Riparian protection can be managed within existing processes.

SPECIAL RECREATION MANAGEMENT AREAS:

Alternative B (Map 2-9 and Table 2-16) provides all the reasonable SRMAs needed in the Final RMP. Alternatives C & D propose far too many marginal locations, and BLM's rational for not including them in Alt B is correct, ERMA status is suitable.

- Potential "East Fork of the Sevier River" SRMA is an open sagebrush flat surrounding the Otter Creek Reservoir. Current dispersed camping and OHV travel is eminently practical and does not need a lot of "Management".
- Potential "Sevier Canyon" SRMA has a major highway and a paved bicycle path running through its length, and is historically occupied with resorts, ranching and farming lands. The DWR is already doing a good job of managing the Sevier River. Riparian protection can be managed within existing processes. Non-motorized recreation opportunities are virtually non-existent, except for seasonal river-running when there is enough water released from Piute Reservoir.
- **Organized group special recreation permits criteria on page 2-62 (Table 2-16) is appropriate, but the time limit for group occupation should be extended to 6 hours to allow for half-day hobby collecting of minerals in any one location.**

NON-WSA LANDS WITH WILDERNESS CHARACTERISTICS:

BLM's rational for not including Non-WSA lands in Alternative B is correct, Alternative D proposes far too many marginal locations. As stated in para. 3.3.12, The Secretary of the Interior is certainly entitled to direct his employees to inventory administered lands for any reasonable use; including potential wilderness. However, even though Congress makes the final decision on establishing Wilderness areas, the fact is that for all practical purposes Wilderness Study areas (WSA) are being withdrawn from multiple use and managed as if they were already established Wilderness Areas.

Alt. D proposes adding to this withdrawal from multiple use by mandating Non-WSA lands with major restrictions, and effectively excludes my family and friends from pursuing hobby collection of minerals and non-vertebrate fossils. Specifically, I object to any inclusion in the Final RMP of "Bullfrog Creek" and "Long Canyon" Non-WSA Lands (Map 3-9 and Table 3-20).

Furthermore, I find objectionable inclusion in the Final RMP of "Kingston Ridge", "Phonolite Hill", "Rocky Ford", and "Pole Canyon" Non-WSA Lands (Map 3-9 and Table 3-20). They do not possess the requisite wilderness characteristics due to

established historical development and use. These lands are also flawed as discussed under ACECs and WSRs above.

OVERALL COMMENT:

The Richfield Field Office is to be congratulated on an exceptional job in preparation of the DRMP/DEIS; especially Alternative B. From personal experience in drafting similar documents for Aerospace contractors and Weber State University, I know the amount of "Agony Units" required. I look forward to seeing the Final RMP/EIS.

Sincerely,

(signed)

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Member: Golden Spike Gem and Mineral Society (Ogden Utah), Timpanogos Gem and Mineral Society (Provo, UT), Beehive Gem Society (Ogden UT), Utah Federation of Mineralogical Societies, Rocky Mountain Federation of Mineralogical Societies, Northwest Federation of Mineralogical Societies, American Federation of Mineralogical Societies, Utah Friends of Paleontology.

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