

RAS 5208

72-22-ISFSI-Applicant Exhibit FF-Rec'd 4/23/02

DOCKETED  
USNRC

January 10, 2003 (2:27PM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**PFS Exhibit FF**

**BLM Letter to SUWA re North Cedar Mountains (May 8, 2001)**

**CLEAR REGULATORY COMMISSION**

Docket No. \_\_\_\_\_ Official Exh. No. FF

In the matter of PFS

Staff \_\_\_\_\_ IDENTIFIED ☒

Applicant ☒ RECEIVED \_\_\_\_\_

Intervenor \_\_\_\_\_ REJECTED \_\_\_\_\_

Other \_\_\_\_\_ WITHDRAWN \_\_\_\_\_

DATE 4/23/02 Witness \_\_\_\_\_

Clerk [Signature]

Template = SECY-028

SECY-02



IN REPLY REFER TO

# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Salt Lake Field Office  
2370 South 2300 West  
Salt Lake City, Utah 84119

8510  
(UT-023)

MAY 8 2001

Certified Mail Number 7000 1670 0006 2991 2615  
Return Receipt Requested

Stephen Bloch, Staff Attorney  
Southern Utah Wilderness Alliance  
1471 South 1100 East  
Salt Lake City, Utah 84105

Dear Steve:

Thank you for providing the Salt Lake Field Office, BLM with your wilderness proposal and accompanying information for the North Cedar Mountains. I have carefully reviewed the submitted documentation and have determined that the information provided does not significantly differ from the information in prior BLM inventories regarding the wilderness values of the area. Therefore, the conclusion reached for this area in previous BLM inventories remains valid and no further review is warranted at this time.

Please contact me if you have any questions or concerns at (801) 977-4300.

Sincerely,

Glenn A. Carpenter  
Field Office Manager

BLM EVALUATION OF EXTERNALLY GENERATED PROPOSALS THAT SUGGEST  
AN AREA OF PUBLIC LAND HAS WILDERNESS CHARACTERISTICS

Proponent Name: Southern Utah Wilderness Alliance (SUWA)

Name of Area Identified By the Proponent: North Cedar Mountains

Brief Description of the Location in Relation to Existing WSAs or Areas Found to Have Wilderness Character in the Utah 1999 Wilderness Inventory: Although the proposal area is not contiguous to a WSA, SUWA claims it is contiguous to the Cedar Mountain WSA (see page 11 and 19, SUWA proposal). The proposal area is approximately one mile north of the Cedar Mountain WSA. The WSA and proposal area are separated by Hastings Pass, a road maintained by Tooele County; and BLM reinventory unit one (see attachment A and B, SUWA proposal).

BLM Field Office: Salt Lake Field Office

Date of Submission: April 11, 2001

ANALYSIS OF EXTERNALLY GENERATED PROPOSAL

1. Does the submission include the required:
  - A. Map which identifies specific boundaries?  
Yes X No
  - B. A detailed narrative that describes the suggested wilderness characteristics of the area?  
Yes X No
  - C. Photographic documentation?  
Yes X No
2. Does the proponent's submission describe how its information significantly differs from the information in prior inventories conducted by BLM regarding the wilderness values of the area?  
Yes        No X

Explanation: The proponent's submission primarily disagrees with a prior BLM wilderness inventory. The proponent repeatedly suggests that BLM's 1980 intensive inventory was flawed. Rationale given by proponent include: adjectives used in 1980 intensive inventory report (sublime), application of naturalness evaluation, outside sights and sounds evaluation, boundary selection, solitude test, assessment of outstanding opportunities for solitude and/or primitive and unconfined recreation, solitude determination, wording of intensive inventory summary, assessment methodology for outstanding opportunities for solitude, conclusions of outstanding opportunities, recreational qualities comparison, cultural resources discussion, or, virtually every aspect of the 1980 intensive inventory. Primarily, the proponent reinterprets the 1980 intensive inventory results by assuming the inventory should have been conducted according to the 2001 Wilderness Manual, a manual which was developed 21 years after the public comment period closed on the intensive inventory.

The proponent claims four items as new information. These are itemized in the following list, followed by BLM's response.

- 1.) Change of southern boundary from Hastings Pass to Lees Canyon. This is not new information. The BLM inventoried both canyons as part of the intensive inventory and found intrusions along both routes. In fact, the majority of intrusions lie north of Lees Canyon and include quarries, livestock trails, motorcycle paths, heavy sheep grazing, and other minor extensions of "ways" used primarily by 4X4 wheeled vehicles.
- 2.) Supplemental values, wild horses inhabiting the proposal area. This is not new information. In 1971, data was generated describing the distribution of wild horses within the SLFO. The Bureau recognized at that time that wild horses inhabited the North Cedar Mountains. Existence of wild horses within the area was also cited within the North Cedar Mountain intensive inventory file through reference to the Skull Valley-Lakeside Management Framework Plan Summary and Highlights (1976). The Skull Valley-Lakeside Management Framework Plan Summary and Highlights discusses the presence of wild horses on the Cedar Mountains within both the recreation and wild horse sections.
- 3.) Supplemental values, cultural resources within the area. Cultural resource inventories have been conducted after the time of the intensive inventory and sites have been found. The number of archaeological sites found in the area represent a ratio of approximately one site per hundred acres, which is not a high site density for the West Desert as a whole. This is new information, but is not significant.
- 4.) SUWA presents as new information the following paragraph (see page 16): "...because of its proximity to the Wasatch Front and Tooele Valley, the North Cedar Mountains have a particularly high value as an urban-interface non-motorized recreation area. The Wasatch Front and Tooele Valley have witnessed a remarkable explosion in urban population, a level that was not anticipated when the BLM's intensive inventory was completed." Anticipated and/or existing population numbers and proximity to urban centers were not factors used in the analysis of an areas wilderness characteristics. This is not applicable new information. The paragraph continues on to state "The BLM's Salt Lake Field Office has undertaken a role, as apart of its

multiple-use mission, of providing quality non-motorized recreation and wilderness experiences to the Wasatch Front; the reinventory and ultimate decision to designate this unit for wilderness study, would provide an excellent opportunity for BLM to continue this practice." While the SLFO appreciates SUWA's recognition of the Bureau's multiple-use mandate which includes opportunities for non-motorized, motorized and other forms of recreation use, the SLFO has not actively chosen one use which it has been tasked to manage, over another. Further, the SLFO does not cater to one population center, but rather treats all public land users as equals.

The following activities have occurred in the North Cedar Mountains subsequent to the 1980 intensive inventory:

- 1) T.1S, R.9W sec. 3 and 4 have been drill seeded as part of an emergency fire rehabilitation project for both the Redlam and Tooele fires (1983, 1984);
- 2.) T.1N., R.9W sec. 33 was drill seeded as part of an emergency fire rehabilitation project for a wildland fire which occurred in 1983;
- 3.) T.1S, R. 10W. sec. 13. Non-native vegetation occurring due to emergency fire rehabilitation project;
- 4) T.1S , R.9W. sec. 29. Wildlife guzzler and maintenance route; and
- 5.) Several existing mining claims exist within the North Cedar Mountains.

In summary, the proponent has not provided significant new information that would change the 1980 intensive inventory determination. The proponent has not provided information to support a re-evaluation of the area. Aside from the lack of significant new information provided by the proponent, the SLFO has documentation on intrusions and developments within the unit which further supports the intensive inventory's determination.

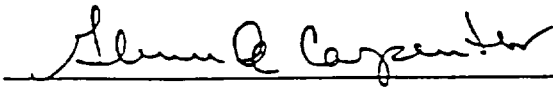
3. Please describe all of the information, documentation, and evidence on which you relied to determine that the submission does or does not provide significantly different information, including but not limited to, the original inventory from 1979-1980 conducted pursuant to § 603 of the Federal Land Policy and Management Act (FLMPA), the 1996-1999 BLM reinventory, maps generated through planning or GIS data, any field observations, any applicable NEPA documentation, and any other relevant information.

North Cedar Mountain Intensive Inventory Unit, UT-020-087 file (1980);  
1996-1999 BLM re-inventory map of Cedar Mountains;  
Range Improvement Projects database (form 4120-8);  
Skull Valley-Lakeside Management Framework Plan Summary and Highlights (1976);  
Wilderness Inventory and Study Handbook, H-6310-1;  
GIS coverage (map) of 1971 Wild Horse Distribution within the Salt Lake Field Office;

Conversation with Peter Ainsworth, SLFO Archaeologist (05-04-01),  
Conversation with Kyle Hansen, SLFO Wild Horse and Burro Specialist (05-04-01);  
Conversation with Michael G. Nelson, SLFO Acting Assistant Field Manager for Non-  
renewable Resources (05-03-01);  
Conversation with Dan Washington, SLFO Natural Resources Specialist (05-03-01); and  
Conversation with Kevin Edinger, SLFO Rangeland Management Specialist (05-03-01).

#### DETERMINATION

The material provided \_\_\_\_\_ does, X does not, constitute significantly different  
information to warrant further review at this time.



Field Office Manager

5/7/00

Date

The determination on this form is part of an interim step in the BLM's internal decision making process  
and does not constitute an appealable decision.