

April 5, 2017

Sent via email to: dhoffhei@blm.gov

Don Hoffheins, Field Office Manager
Monticello Field Office
Bureau of Land Management
Monticello, UT 84535

Re: Significant ground disturbance by earth-moving equipment at locations on the Perkins allotment

Dear Mr. Hoffheins,

This past weekend I was recreating in the southern portion of the Monticello Field Office and observed 3 locations where there was significant ground disturbance by earth-moving equipment, one of which appeared to be within the Road Canyon Wilderness Study Area (WSA) boundary adjacent to the Valley of the Gods road (Location 1). This area is also within the Cedar Mesa Special Recreation Management Area (SRMA) which was designated for its cultural and scenic values. As you know I have long been concerned about the depleted resource conditions on the Perkins allotments, the North Perkins allotment in particular, and have reported to your office instances of resource degradation or permittee non-adherence to the grazing permit requirements. Again this past weekend I observed cattle scattered on the N. Perkins Allotment from Hwy 261 to well east of the corral off road 226. I observed levels of grazing that would fail to meet rangeland health standards. Now, I have concerns regarding the impacts of these new actions.

As an interested public on this allotment I believe I should have received notice of the management decision to allow these new ground disturbing actions. While these "stock tanks" or livestock reservoirs may have been pre-existing and the earth-moving work could be described as "maintenance" these actions must be authorized by the BLM before the permittee can act. Did the Monticello BLM provide authorization for these activities to occur?

In particular the vehicular access and ground disturbance at the location within the Road Canyon WSA and Cedar Mesa SRMA is concerning. These are areas that require BLM to provide special management attention. While livestock management and maintenance activities can be authorized within a Wilderness Study Area, the BLM must consider resource concerns, NEPA analysis, and authorize any warranted mechanized activity in writing.

According to the [Utah Statewide Wilderness Study Report](#) Volume 2, Part 2 in describing Road Canyon WSA on page 609:

"Thirteen livestock reservoirs inside the WSA are all near the boundaries. Most of the reservoirs are more than 20 years old and are substantially revegetated. Few of the dams are more than 6 feet high or more than 30 feet long and reservoir areas are less than .25 of an acre."

The ground disturbance observed at the location east of Valley of the Gods Bed & Breakfast, within Road Canyon WSA/Cedar Mesa SRMA (approximate location from Google maps 37.266935, -109.907984) resulted in visual blight in a drainage of lime creek that far exceeds the historic 6 feet in height and 30 foot length described above. This is in a VRM Class I area. Please provide information regarding the

extant of this “development” prior to the recent disturbance and the BLM’s decision process for allowing the recent earth moving to occur.

Another area of disturbance is south of the Moki Dugway along the west side of highway 261 less than a ¼ mile south of the Valley of the Gods road turnoff (Location 2). (google maps 37.262205, -109.931201)

The third location (Location 3) is on the top of Lime Ridge off road 226, north of the corral north of highway 163, several miles west of Comb Wash. (google maps 37.262140, -109.743517)

All three of these areas of disturbance appeared to include new acreage not previously disturbed. All were well vegetated, providing wildlife habitat, prior to disturbance. Some of the dirt berms are more than 20 feet high. Please provide me with the National Environmental Policy Act (NEPA) compliance that your office completed regarding these actions.

It may be that there are other locations/livestock reservoirs on these allotments where there has been recent ground disturbance. These are simply the ones I observed during my weekend camping trip in the area. If there are other areas BLM knows there has been recent earth moving activity, I ask you to please provide a list of those locations.

There is another situation I’d like to bring to your attention. On April 3, after I stopped to photograph the stock reservoir ground disturbance near the corral at the top of Lime Ridge along highway 163, my husband and I were accosted by three cowboys (one of whom I believe was Zane O’Dell and one who I believe was Zeb Dalton and one unknown to me) who physically blocked our vehicle, accused us of criminal activity, threatened us with jail, and prevented our return to the highway. This was a distressing and fearful experience for both of us. My husband was falsely accused of preventing livestock from reaching water. The San Juan County Sheriff was called, responded, spoke with us and cleared us to leave.

As visitors to our public lands who have long been interested in public lands grazing and have documented and reported information to the BLM and attempted to affect BLM management via proper channels, this assault and behavior by BLM permittees is unacceptable. I would like to lodge a complaint and ask that this complaint be included in these permittee’s files. Neither I nor my husband did anything to harass or endanger the livestock present on the allotment. We were in the area documenting the recent earth moving activity.

I look forward to learning more about the ground disturbance documented in the attached photos. Thank you for your attention to this matter.

Sincerely,

Rose Chilcoat

Durango, CO

Rose.chilcoat@gmail.com

Attachment – zip file of photographs