



Recd. 09/25/2006

September 21, 2006

Carter Reed,
Oil and Gas Team Leader
Fishlake National Forest
115 East 900 North
Richfield, UT 84701

RE: Supplemental Scoping Comments for the 'Oil and Gas Leasing Analysis Project'

Dear Carter,

The Utah Environmental Congress (UEC) would like to submit the following supplemental scoping comments regarding the Oil and Gas Leasing Analysis Project. UEC submitted detailed and timely scoping comments last month for this EIS process. These comments supplement and do not replace our earlier scoping comments.

As you may know, the 2005 State Petitions Rule has been set aside nationally because it violated the APA, ESA, and NEPA, and the 2001 Roadless Area Conservation Rules (RACR) have been re-instated across the country. There is no exception to the prohibition on road construction or reconstruction in Inventoried Roadless Areas for any lands leased after January 12, 2001 on this Forest. 36 CFR §294.12. Road construction is "Activity that results in the addition of forest classified or temporary road miles." 36 CFR §294.11. The proposed action and action alternatives for this DEIS will need to be developed such that they comply with the above, as well as the rest of the RACR. The proposed action should not allow for leasing inside IRA.

UEC was not involved in the litigation that resulted in the 2005 Rules being thrown out, but we believe the process was illegal anyway. States and counties do not have such expansive authority over nationally owned reserved public land that belongs to all Americans.

Please maintain the UEC on all mailing lists associated with the proposed action. Please mail UEC hard copies of all decision documents and environmental documents as soon as each is available for public review and/or comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Mueller", is written over a horizontal line.

Kevin Mueller,
UEC Executive Director