

APPENDIX 18

RESPONSES TO PUBLIC COMMENTS

Arkansas River Travel Management Plan EA

The comment period for the Arkansas River Travel Management TMP EA ran from June 20 to August 3, 2007. A total of 743 individuals and organizations submitted written comments. All of the comments were reviewed by BLM to determine if revisions of the EA an/or Proposed Action were warranted. Comments that simply favored or opposed specific alternatives or those that agreed or disagreed with agency policy without justification were not considered substantive comments. Substantive comments are defined as those that encompass one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EA
- Question, with reasonable basis, the adequacy of the environmental analysis
- Present reasonable alternatives other than those presented in the EA
- Cause change or revision of the proposal

The following is a summary listing of the substantive comments, followed by the BLM's response to them. The comments are not presented here in there entirety but are available for public review in the Administrative Record located at the Royal Gorge Field Office in Canon City, CO.

CommentID	A
General Comment	A large volume of public comments expressed support for trails proposed by the Colorado Motorcycle Trail Riders Association (CMTRA) assessed in Alternative A but not included in Alternative C (proposed action). Many of the comments supported the NO Action alternative, expressed alarm at a perceived loss of access, discounted impacts identified in the BLM's environmental assessment or stressed that rough terrain is desirable for OHV riding experience.
Examples	<p>I support the specific proposals put forth by Colorado Motorcycle Trail Riders (CMTRA) for trail improvements in the Texas Creek Trail system.</p> <p>we will ALL lose access to our beautiful state. When we limit some peoples use, it isn't long before we limit all peoples use</p> <p>Under these proposed Alternatives, the ratio of "O" trails being closed to other trail types is about 10/1 to 50/1 or more, which is a disproportionate, discriminatory and unfair burden to the 4WD community. Recreational opportunities for 4WD users are being curtailed far more than for any other group.</p>
BLM Response	<p>BLM is not limiting public access to public lands where legal public access exists. BLM is designating a transportation system that balances the need for a variety of recreational opportunities with public land health.</p> <p>Designated motorized routes to and through BLM public lands remain extensive under all alternatives in the EA and vary from 219.9, 135.1, to 181.2 miles in Alternatives A, B, and C, respectively (Appendix 15). In addition to the 106.9(A), 43.3(B), and 76.8 (C) miles of designated nonmotorized routes evaluated, foot and horse access to all 244,000 acres of public land is guaranteed by law.</p> <p>Fundamental to recreation and travel management planning, BLM Colorado Standards for Public Lands Health and BLM Recreation Management Guidelines also require agency attention to resource protection of soils, animal and plant communities, water, wetlands and riparian areas.</p> <p>Alternatives considered in this EA do not reserve exclusive use for any one group, nor does the TMP</p>

accommodate for all uses on every acre of land in the planning area. It is entirely appropriate, and BLM policy, that different areas of a planning area provide different opportunities for recreational access, and travel designations that sustain resource values in particular locations.

The proposed action and action alternatives described and assessed within the Arkansas River Travel Management Plan EA reflect and adhere to principals of multiple use management of public lands. Furthermore, Alternatives A, B, and C developed for the EA mirror the varied public input, agency, and partner issues and concerns on this federal land management action.

Each alternative would provide access for both motorized and nonmotorized users under varied levels and travel network configurations. BLM believes that the Proposed Action (Alternative C) provides a balanced supply of recreational travel access and opportunity in the Arkansas River travel planning area in a manner that is environmentally sustainable over the long term.

CommentID	AA
General Comment	Several public comments questioned whether the "100 foot" parking rule would adversely impact public safety.
Examples	I must say that in general, limiting camping spots to within 100 feet of the road is ridiculous. That puts families and camping gear more in the open instead of up against the trees. It puts them closer to the road making noise in camp much more of a hassle. It also puts families with young children closer to the traffic and dangers that presents.
BLM Response	The "100 foot rule" allows BLM to better control impacts associated with dispersed camping than the "300 foot rule." Page 169 under "Mitigation Common to All Alternatives" Item 8 allows BLM to designate spur routes to appropriate campsites and incorporate them into the travel system.

CommentID	AAA
General Comment	Some comments questioned travel management allocation differences between user groups in the proposed action.
Examples	<p>You have made allotment for more mtn bike routes around Salida but very few more ATV trails. ATV usage is on the rise and additional trails need to be planned.</p> <p>User groups should be expected to share this small resource and not demand and receive special treatment because of their intolerance.</p> <p>By not allowing this you reduce the ability of older and less healthy hunters there enjoyment of hunting.</p>
BLM Response	<p>Land, resources, and recreation opportunity vary across the planning area. BLM considered natural resource status, use, allocation, and travel designation utilizing best available data and geographic measurement in the EA. The Current Management/No Action evaluated existing and user-created routes, including unauthorized ATV and mountain bike trails. The agency evaluated impacts of increased designation of more ATV and motorcycle trail miles in the Texas Creek TMP sub-unit in Alternatives A and C along with increased mountain bike trail miles in the Salida sub-unit. (Maps 9 & 13)</p> <p>The proposed action (Alternative C) includes designation of increased ATV and motorcycle trail miles (Map 5 - Trail A-2) at Table Mountain in Texas Creek. Alternative C also includes designation of a portion, though not all, proposed mountain bikes. BLM interdisciplinary resource staff impact evaluation documented anticipated environmental impacts from general, ATV, motorcycle, and mountain bike routes following BLM Colorado Public Land Health Standards.</p>

CommentID B

General Comment The largest volume of public comments expressed support for travel route designations evaluated in the Proposed Action (Alternative C). The comments questioned impacts to the environment that would result from travel route designations identified in Alternative A.

Examples I like the idea of designated routes and seasonal & temporary closures when conditions merit it.

BLM Response BLM recognizes and appreciates your public comment and support for recreational travel designations and impact assessment documented in the Arkansas River Travel Management Planning Environmental Assessment and Proposed Action (Alternative C). BLM agrees that travel route designations identified in Alternative A would adversely impact riparian areas, soils, and presently unfragmented wildlife habitat in Fernleaf Gulch. Guidelines for further route construction under such routes as S-1 are identified in Appendix 6.

CommentID BB

General Comment One public comment recommended designating High Mesa Grassland Natural area as "closed to motorized use"

Examples Alternative not considered: Consider closing: High Mesas Grassland Research Natural Area by changing the designation to "closed to motorized use."

BLM Response BLM's proposed action maintains administrative use of system roads in the High Mesa Grassland for resource management, monitoring, and general access into these public lands. Traffic in the area is low (less than 1-2 vehicle trips/year). BLM closely monitors this area for evidence of noxious weed spread to protect sensitive plant communities.

CommentID	BBB
General Comment	One comment questioned the adequacy of indirect impact analysis on riparian systems. This comment is generally answered, but is followed up by a more specific tread width impact discussion.
Examples	The EA underestimates the impact of the proposed alternative on riparian areas.
BLM Response	<p>BLM RGFO did analyze indirect impacts from travel ways, as well as their cumulative impacts upon riparian resources in its evaluation of the three Alternatives. Page 71 describes that much of BLM riparian resources are along small first or second order tributaries. BLM experience with these riparian areas is that they are very narrow. In order to explore indirect affects to these small systems, BLM expanded analysis of routes for inclusion out to a 100 ft from the edge of riparian in addition to analysis of routes that are directly within riparian habitat.</p> <p>Indirect impacts are also explained in other sections of this document but explained in detail by reference in BLM Travel Management documents. Pg. 73 cites regional indirect affects from travel routes discussed in the Gold Belt and other Travel Management Plans. Pg. 75 also discusses indirect affect of routes upon waterways. Pg. 72 highlights route disturbances in dry channels which are then further evaluated in the Water Quality Section and that they have cumulative impacts to the larger Arkansas River. Virtually all routes yield a negative route-and-water interaction that is known to upset the delicate water and sediment balance of overland flow and erosive processes that indirectly can affect riparian function (given a reasonable proximity to a stream). The tables merely serve as a display of routes that run directly within and those reasonably adjacent (indirect) to riparian areas. Habitat fragmentation, increased erosion, storm runoff, altered flow regimes, and the commenter's other points are addressed within this document; often repetitively, in the Wildlife section, Water Quality, Hydrology and other sections. Table 6-3 is meant to present an array of analysis of most to least impacting Alternatives', but does not reflect all known indirect impacts. Riparian resource protection played a critical role in developing all Alternatives thus yielding the relatively subtle direct impact differences between them. It should be clear however that any of the alternatives do affect riparian resources.</p> <p>In an attempt to resolve remaining uncertainty relative to this topic, additional clarification about this comment was sought and hopefully obtained by BLM in a discussion of 11/20/2007 with Mr. Aaron Clark of the BLM's Resource Advisory Committee. In addition to the cumulative effects analysis described above, more specifically, there is concern that the BLM analysis of routes, and Alternative, under-represents cumulative effects because routes changed to a lessor impacting route designation, (e.g. a four wheel drive route changing to a motorcycle, bicycle, horse, foot trail) may not always physically on the ground become narrower. At least without actual trail work to narrow the tread. For example trail users may continue to use the entire width and ride side by side. BLM acknowledges that during analysis an assumption was made that the trail width would become narrower. This assumption is based upon largely empirical evidence by staff that observe this occurs during inventory of routes and there is a general tendency that they do narrow once downsized, but the commentator is correct that this is not always correct, or there is variation in the rate of change. BLM's assumption however is combined with the hopeful plan that in cases where this is not as likely to occur naturally (e.g. dry sites/poor soil conditions for regrowth of vegetation) that funding obtained for the implementation of the Travel Management Decisions would be used to accomplish a narrower trail width with techniques such as rock placement, scattering of forest debris, and tread obliteration. It is probable that some locations will remain larger (i.e. more acres of trail remaining) than the analysis would assume. BLM will watch for these locations and attempt to apply special remedy. BLM hopes that because the relative difference between Alternatives, whereby there are riparian resources affected that these can be easily selected and have special management applied.</p>

CommentID	CC
General Comment	A couple of public comments addressed trail use and maintenance standards
Examples	BLM should adopt strict specific and measurable trail use and maintenance standards adaptive management strategies that will allow for changes in types and times of use if trail standards are not met.
BLM Response	Trail use is dictated by the specific route designation; for example, on a route designated Open to All Motorized Use, any motorized vehicle is permitted while on a route designated for motorcycle use -- larger motorized vehicles like ATVs would be prohibited. Likewise, it would be illegal for motorized vehicles to use non-motorized routes. Trail maintenance standards depend upon the type of trail, intensity of use and other factors. BLM intends to maintain routes through a variety of methods including using appropriated funds, developing partnerships, and pursuing grants. BLM has the authority to implement management changes as needed.

CommentID

D

General Comment

One public comment addressed impacts of the Arkansas Travel Management proposed action on recreational target shooting, off road game retrieval, and BLM coordination with civic organizations defined in the BLM Sportsman Roundtable.

Examples

The reason for the restriction, as stated in the EA, is that the Forest Service is currently proposing such restrictions for parking and camping in its TMP, and Colorado BLM wants to be consistent with the Forest Service rule.

By proposing to include game retrieval in the parking and camping restriction, it would appear that the BLM is not being consistent, but is in fact broadening the restriction beyond that of its sister agency.

Because no further information is provided in the EA, it is not known to what degree game retrieval contributes to unauthorized OHV routes.

The NRA is not aware that the Royal Gorge Field Office brought its concerns about recreational shooting to the attention of the BLM Washington Office which participates on the Roundtable.

The EA raises the issue of user conflicts. If areas are designated for recreational shooting, why should there be user conflicts? Just as trails are created for hiking or sites are designated for camping, are areas set aside specifically for recreational shooting to avoid conflicts? The EA states that gunfire at the areas proposed for closure are disruptive to other recreationists and nearby residents. We suspect that recreational shooting had taken place in these areas long before other recreationists came along, and people began building homes on the boundary lines. What is BLM's plan if other recreationists and residents complain about the increase in gunfire at other shooting areas? Does the BLM have a management plan for recreational shooting that provides for the needs of the shooters and prevents conflicts with other recreationists and residents?

The NRA requests that the BLM delete the shooting closures from the TMP and, instead, initiate a separate process to examine the recreational shooting issues under the umbrella of the MOU.

Unless we can forge a partnership to identify problems and solutions, the NRA is very concerned that every reason the EA gives for closing the 27,000 acres could be used to close every acre left open by the TMP.

BLM Response

The BLM initiated the Arkansas River Travel Management Plan in 2003 when US Forest Service parking regulations for camping, wood gathering, and game retrieval was 100 feet. USFS modified these regulations from 100 feet to vehicle width in the previous year. BLM maintains discretion to define parking rules consistent with the USFS along the Front Range.

The proposed target shooting closures involve less than 3000 acres of public land in a planning area that encompasses 240,000 acres of public land still open to target shooting. The BLM is not presently considering target shooting closures in other areas. A new developed public shooting range that handles pistols, rifles and shotguns has been developed within the past year north of Salida adjacent to the county landfill and can adequately handle much of the displaced shooters around Salida. Hazardous material and public safety issues associated with concentrated target shooting in the increasingly urbanized vicinity of Salida, can be more effectively managed at such a public facility.

The target shooting closure defined in the proposed action is supported by Chaffee and Fremont counties as well as the Front Range Resource Advisory Council and represents fundamentally reduced threat to public safety than the current situation at Salida and Turkey Rock. The number of shooters affected at Turkey Rock is much less than the area south of Salida. Monitoring by BLM personnel will be done around both areas to watch for problems.

BLM is not making recreational shooting a victim of illegal dumping. There is an enormous amount of trash left behind from target shooters in the Salida and Turkey Rock areas, including spent shells, targets, pop cans, etc. A sub-set of recreational target shooters occasionally bring large items to public lands, including washing machines, TVs, computer monitors etc. to dump on BLM and use as targets. Most times other illegal dumpers bring out the large items which are then used by recreational shooters as targets. Sometimes the trash left from shooters attracts other trash dumping.

BLM has met with shooters and other users on some of the sites we have proposed to close. In one case, north of Canon City on Dinosaur Flats, BLM closed a portion of the area and kept some of it open for

shooting. The purpose of the Colorado Front Range Sport Shooting Memorandum of Understanding (MOU) that was signed in July, 2007 is to develop safe, sustainable shooting opportunities for shooters. This group is comprised of Federal and State agencies as well as numerous sportsmen's organizations. This group was formed in response to the closures of shooting areas on both USFS and BLM lands where problems such as safety, resource damage, adjacent homes, etc were encountered. NRA, as well as the Colorado State Shooting Association were invited to join this group to be part of a proactive solution to the shooting closures. Both invitations were declined. The signatories to the Colorado Front Range Sport Shooting MOU are presently working on developing new shooting ranges in response to public concern over shooting closures.

BLM does not designate areas for recreational shooting. BLM administers public land under legal requirements that include inventory and clean-up of hazardous material as well as liability issues that prevent the BLM from managing concentrated target shooting on public land.

BLM complied with public notification requirements of the National Environmental Policy Act and informed signatories of the Federal Lands Hunting, Fishing and Shooting Sports Roundtable MOU of the published EA by email in June 2007. Response received from the public interested in target shooting verifies the success of BLM public participation. BLM also worked closely with signatories of the The Colorado Front Range Sport Shooting MOU, a local initiative patterned after the Federal Lands Hunting, Fishing and Shooting Sports Roundtable MOU. Signatories to the latter include BLM, USFS, Colorado Division of Wildlife and sportsman organizations.⁹⁸ The latter group was organized to respond to public lands issues associated with concentrated target shooting, including public safety. The Colorado Front Range Sport Shooting work group leverages on-the-ground knowledge and develops workable solutions at the local level. BLM helped form this group and signed the MOU in July, 2007. NRA was invited to join this group and declined.

The proposed BLM shooting area closures at Salida and Turkey Rock were discussed at several public meetings, in news releases and at several different meetings of the Colorado Front Range Sport Shooting Work group between 2003-2007. BLM formed this group – so we can meet each other and discuss issues like shooting problems and hopefully identify solutions. It is not too late. We are inviting you to join our MOU once again.

CommentID	DD
General Comment	One public comment addressed shared Colorado Division of Wildlife concern for OHV damage to wildlife habitat and shared law enforcement of OHV road and trail use on public lands
Examples	the Colorado Division of Wildlife, is well aware of the issues with damage to public lands by OHVs and has been meeting with concerned sportsman and organized OHV groups to formulate legislation for the 2008 session that will allow our officers to assist in the enforcement of BLM and Forest Service travel management regulations. CDOW, sportsmen and responsible OHV users recognize the damage irresponsible OHV users are causing.
BLM Response	BLM will welcome state assistance in enforcement of travel management decisions to reduce OHV damage on the public lands in the planning area.

CommentID	EE
General Comment	One public questioned whether prospectors will be required to adhere to route travel designations adopted in Arkansas River Travel Management Planning.
Examples	I am a amateur prospector and use ATV's to transport equipment to and from potential mining sites as well as sampling potential sights. Is you management plan going to restrict my ability to prospect? Utility ATV's do little to no damage to the environment.
BLM Response	All public will be required to stay on designated roads and trails under Arkansas River Travel Management decisions.

CommentID F

General Comment Several public comments addressed BLM road and trail management on designated OHV routes to protect soil resources from damage during wet weather.

Examples Motorized travel should be restricted to designated routes, and even these should be subject to temporary closures when weather or the season warrants it.

BLM Response BLM identified soils impacts from the route designations in Alternatives A, B, & C and No Action in the environmental consequence section. BLM maintains management discretion to enforce wet weather closures on all roads and trails when soil conditions warrant such management to prevent resource damage.

CommentID FF

General Comment One public comment questioned the amount of easier mountain bike trails in the Proposed Action (Alternative C).

Examples There are many expert &/or high altitude trails in the area, but seems to be a shortage of beginner/intermediate trails close to town.

BLM Response This issue was brought to BLM's attention by Salida Mountain Trails and was considered in the development of the alternatives in the TMP. BLM considered mountain bike trails proposed on BLM lands the "S" Mountain area and BLM lands south of town adjacent to powerline road. Guidelines for new mountain bike trails are defined in Appendix 7

CommentID G

General Comment Several members of the public questioned the rationale and need to close areas of the public land to recreational target shooting and expressed concern that adverse impacts to public lands, such as trash dispersal, would result.

Examples EA assumes there are many GOOD places to use firearms. Any change in land use by the BLM should not include closing ANY land to target shooting or hunting. Target shooting and hunting are among the safest outdoor activities in Colorado.

With open private land use becoming less common due to the actions of a small percentage of individuals it is most necessary to keep tracts of land such as BLM holdings openly available to all who wish to use the commodity.

It is imperative, that the people of this great country, are afforded the opportunity to continue marksmanship training, whether by legal hunting or target shooting activities

BLM Response Recreational target shooting can occur on public lands in the majority of the travel management planning area. Identifying specific alternative areas for this activity would only encourage concentrated target shooting activity in these areas. As a matter of policy, BLM does not designate areas for target shooting. Proposed target shooting closures on public lands near Salida and Howard is BLM's response to public safety issues in those areas. Risk to life and property associated with concentrated target shooting on public land adjacent to densely populated or high recreation use areas is the environmental context and concern.

The intensity of proposed target shooting closure over current conditions is 1% of public lands acreage in the planning area and less than 0.2% of surface area managed by BLM Royal Gorge Field Office. Under BLM travel management planning proposal (Alternative C), 99% of public lands in planning area will remain open to recreational target shooting. No public lands are proposed for closure to licensed hunting. BLM's experience in the Gold Belt area is that dispersing recreational target shooting activity creates fewer impacts (trash, noise, user conflicts) than concentrating target shooting activity in smaller areas.

CommentID GG

General Comment Several comments addressed the impact of OHV designations on game retrieval and herd management.

Examples I realize that the 4 wheelers and motor cycles are tearing up the country and that you have to do something about it. But remember there is another side to it. The elk are taking over the area. If you stop hunters from using 4 wheelers to get their kill, they won't hunt. Then we have more elk eating up the country.

BLM Response The CDOW is responsible for managing elk herds in Colorado. The objective for elk herds in the area covered by the TMP is within CDOW objective's. There are areas where there is a distribution problem and elk are causing localized problems. BLM does not believe that limitations placed on the use of ATV's will lead to a reduction in harvest. Recent USGS research in Gunnison County on OHV traffic and elk herds verifies anecdotal evidence that elk move away from roads and heavy use areas, potentially making them less available for harvest. BLM believes that a reduction in roads, trails, and extent of traffic will facilitate an increase in harvest and a more enjoyable experience for the vast majority of sportspersons. Limiting the use of ATV's for game retrieval will not affect a majority of hunters.

CommentID GGG

General Comment One public addressed the need for BLM to forcibly acquire rights-of-way to prevent access closures by private individuals to public lands

Examples d. If numbered roads and trails are open and available, then fines should be high and heavy for violators who are creating new or using unnumbered trails.

BLM should get congressional authority to require right-of-ways for all existing roads to cross or come within 150 feet of BLM land. This will prevent a landowner from closing the road or building their road to within a few feet of the property line and then preventing access via "dead-end" driveway.

Problem Target Shooting: If target shooting is a concern, the BLM should designate special target shooting areas in each subunit. This way target shooting can be limited to safe terrain area that can be selected to minimize environmental impact and yet be conveniently located enough so people will use them.

BLM Response BLM realty authorizations are governed by Congress. The current action is a Travel Management decisions authorized under BLM Colorado guidelines and under the Federal Code of Regulations at 43 CFR 8340.

CommentID HH

General Comment One public suggested isolating OHV use to public lands with low resource value.

Examples If the BLM's mandate permits motorized recreation, it should be confined to the lowest value, most closely supervised areas under the agency's control.

BLM Response BLM assesses and compares resource values but does not assign a specific "value" to public lands. For example, the eroded terrain in the Castle Garden area south of Salida has limited forage value for many wildlife species or domestic livestock but sustains viable populations of a globally rare plant specie, *Eriogonum brandegii*. Coincidentally, steep dropoffs and eroded terrain in the area have also attracted motorcycle, 4x4, mountain bike use, as well as trash dumping, all of which threaten this BLM sensitive specie. The agency does not consider lands under it's management as having a "lowest" value. More common scenarios under BLM's land management jurisdiction are situations of competing resource values, including recreational travel.

CommentID HHH

General Comment One public questioned the closure of the trail Minesweeper.

Examples #570
4x4 trail known as Minesweeper, and is known nationwide

BLM Response Minesweeper occurs in a wetland-riparian system that has experienced recovery over the last few years. BLM believes that a vegetated drainage is key to mitigating rapid sediment runoff in an area adjacent to Colorado Highway 50.

CommentID I

General Comment Some comments criticized OHV designations in Alternatives A, B, and C as restricting recreational travel on public lands by older and/or disabled people.

Examples Proposal impacts recreation opportunities for disabled people

Being a handicapped person you are taking away my ability, which I have had for many years, to enjoy public lands with my family. I and my family support the NO Action Alternative.

As public lands are used extensively for seasonal hunting in this study area, I would like to address access for hunters that are very young, very old, and infirmed. I don't feel you have given sufficient consideration for motorized access for these people to these areas.

BLM Response Alternative C maintains a variety of recreation opportunities. Motorized access in and of itself does not constitute recreation opportunities for disabled persons. There are a wide range of disabilities and a wide range of personal preferences for recreation among people with disabilities. Alternative C provides individuals with mobility related disabilities (and who wish to use an OHV) to have access to many different areas and experiences.

CommentID II

General Comment Several public comments addressed BLM consistency with USFS parking rules as a driver in travel management decisions.

Examples I request that the BLM follow the USFS Pike-San Isabel's lead on eliminating the road buffer. The current proposed road buffer is in contradiction with their "designated routes only" goal.

BLM Response BLM's analysis shows that reducing the allowance for off-route travel for camping, parking and other uses from 300 to 100 feet would reduce impacts. BLM has the authority to further restrict off-route travel if the "100 foot rule" is not sufficient to protect resources.

CommentID J

General Comment Some public comments expressed concern that travel route designations would adversely impact game management and game retrieval on public lands.

Examples Impacts to game management - the weight of game retrieval requires the use of a vehicle for this purpose.

BLM Response In the past BLM off-road activities have been limited to existing roads and trails only. Therefore the retrieval of game with a motorized vehicle has never been allowed off an existing road. BLM is now moving to a system of designated roads and trails for off-road use. Moving to a system of designated roads and trails will not change the ability of hunters to access game off road, it will still be illegal to do so. In addition BLM believes this restriction affects a relatively small number of hunters. The topography in the Arkansas River TMP area is extremely rough and rugged and in most areas motorized access off road is difficult.

CommentID JJ

General Comment Several public comments addressed the need for adequate law enforcement

Examples ** All of this will just be a piece of paper –or reams of paper- without an on the ground enforcement presence. Currently we have only one officer to cover Canon City to Leadville! He is very able and active, but is eligible for retirement. Plan for a replacement and reinforcements.

BLM Response BLM agrees that law enforcement is vital to successful travel management. However, law enforcement is only one aspect of travel management implementation. Signs, maps, education, on the ground closures (fences, barriers), partnerships with user groups, and other methods are important tools for effective implementation.

CommentID KK

General Comment Public comments questioned the impact of game retrieval and OHV damage to public lands.

Examples The frequency of game retrieval by OHV is almost microscopic in relation to other activities allowed on public land.

BLM should highly consider requiring OHV owners to register their OHV with the Federal Government and dedicate that revenue for resources to monitor public lands more closely. Again, please do not prohibit off highway vehicles (OHVs) from retrieving game on public lands. Closing off public lands is not the answer!

BLM Response Hunting is a common and widespread recreational use of public lands within the Arkansas River TMP area and motorized off route travel for game retrieval does impact public lands. In the past BLM off-road activities have been limited to existing roads and trails only. The retrieval of game with a motorized vehicle has never been allowed off an existing road. BLM is now moving to a system of designated roads and trails for off-road use. Moving to a system of designated roads and trails will not change the ability of hunters to access game off road. It will still be illegal to do so. BLM believes this restriction affects a relatively small number of hunters. The topography in the Arkansas River TMP area is extremely rough and rugged and in most areas motorized access off road is difficult.

It is beyond the authority of BLM to require OHV owners to register with the Federal Government and to impose Federal taxes on OHVs. The development and passage of legislation is the business of Congress. BLM (part of the Executive Branch) executes laws and does not make them. The State of Colorado does require OHV registration.

CommentID L

General Comment

Examples

We strongly question whether motorized recreation impacts can be mitigated by designating more routes, effectively attempting to solve the problem by dilution. This would inevitably lead to transferring of these impacts to other areas which are currently unimpacted.

BLM should consider whether 100 feet off designated routes may lead to unnecessary and undamaging proliferation of dispersed campsites in a particular area.

S-1 motorcycle route would involve entirely new construction in a drainage outside of the current Texas Creek motorized Area

A-1 would traverse wetland and steep terrain and would create an enforcement problem.

S-2 and A-3 routes would impact wetlands and riparian areas in Fernleaf Gulch

An open Bear Gulch Road will create WSA trespass enforcement issues and trespass

BLM Response

BLM agrees that dilution of OHV impacts is not the answer. BLM believes that linking OHV areas together leads to the fragmentation of wildlife habitat. BLM is committed to preventing fragmentation of habitats when possible. Wildlife does better in larger blocks of undisturbed habitat rather than smaller fragmented pieces. Habitat fragmentation is considered to be the greatest threat to biological diversity. Determining when a road or trail causes habitat fragmentation and how it contributes to a reduction in biological diversity is extremely difficult. Nevertheless, protecting large, undisturbed areas of wildlife habitat was considered when decisions were made concerning travel management in the Arkansas River travel planning area. Preventing fragmentation maintains wildlife movement corridors. Corridor use by wildlife is influenced by topography, vegetation, species of interest and nearby human activities. A wildlife corridor should serve to provide for several functions such as providing wide-ranging animals an opportunity to travel, migrate and meet mates, allow plants to propagate, provide for genetic interchange, allow for populations to move in response to environmental changes, and to allow for individuals to re-colonize habitats. Corridors are needed to maintain connectivity among formally contiguous habitats.

BLM's analysis shows that reducing the allowance for off-route travel for camping, parking and other uses from 300 to 100 feet would reduce impacts. BLM has the authority to further restrict off-route travel if the "100 foot rule" is not sufficient to protect resources.

S-1 trail will only be analyzed when and if the proponents provide BLM with a detailed proposal.

BLM regularly monitors the Upper and Lower Grape Creek WSAs in the vicinity of the West Bear Gulch Road and has seen very little evidence of illegal motorized trespass in this area. Closure of the West Bear Gulch Road would make it more difficult for BLM to monitor the WSAs.

CommentID NN

General Comment A couple of public comments questioned the public participation followed by BLM.

Examples Your short comment period "without" public meetings appears you intend to run this program through without thorough public meetings to fine tune the alternatives

Your process is severely flawed and you should take a step back, show us your reasoning for your closure decisions, hold public meetings and let us respond.

I am suggesting you extend your comment period and change your approach to receiving public input. Anything less reflects negatively on your office and BLM as a public land administrator.

BLM Response BLM EPA public participation completed through the course of the Arkansas River Travel Management Plan Environmental Assessment (EA), extending from the Notice of Intent publication in the federal register in June, 2006 to public meetings in February, 2007, is documented in the EA on pp.186-187.

BLM provided news releases of the EA in June, 2007. Media articles on the EA appeared in The Gazette, Denver Post, Mountain Mail, Canon City Current and Channel 13 News in June 2007. BLM released the EA for a 45-day public review period on June 20, 2007. Printed copies of the EA were distributed to members of the public who participated during scoping and partner agencies. Printed copies of the EA were distributed to public libraries in Salida, Canon City, Florence, Pueblo, Colorado Springs, and Denver. Digital copies of the EA were provided to the public at public meetings in Salida and Canon City on 6/20/2007 and 6/21/2007 respectively. Digital versions of the EA and maps were made available on the internet on 6/21/2007.

BLM does not discriminate against older hunters by not allowing the retrieval of game with ATV's. BLM believes that hunters should only hunt in areas where they can enjoy the sport within the confines of the laws and regulations that happen to be in place for the area. If ATV's are restricted in some areas then hunters should find places where there are no restrictions in place if they wish to retrieve game with an ATV.

CommentID	P
General Comment	A number of public comments questioned direct impacts of proposed motorcycle trials practice areas at Turkey Rock under Alternative C.
Examples	<p>I can see turkey rock from my home in the acres of ireland subdivision in howard and hear bikes. I rarely see trial bikes in the Turkey Rock area and do not support extending time/dates open to trial bikes.</p> <p>Repeated cross country travel by all recreational users, motorized or quiet, can and has had devastating effects on the lands in our area.</p> <p>Members of our group have concerns about the opening of the open travel Trials area near Turkey Rock. We feel this sets an inconsistent precedent with the rest of the plans restriction to open cross country travel. Quiet users frequently use this area also, and feel like they will be displaced and negatively impacted by noise and dust if the low level of motorized use in this area increases. We would like to suggest restricting the hours of motorized use at this site to perhaps 10 a.m.- 5 p.m. as a compromise to lessen the conflicts.</p>
BLM Response	<p>Since 1992, BLM has approved and monitored 14 trials bike Special Recreation Permits at Turkey Rock. The number of predicted and/or measured sport trials bike visitors at each event, including staff, riders, and spectators, has ranged from 37-89 and averaged 66/yr, according to BLM records. BLM assessed two proposed year-round designated trials bike practice areas in the EA (Maps 2-4), as proposed by Colorado Motorcycle Trail Riders Association.</p> <p>The public is correct that motorcycle trials bike events at Turkey Rock have been a BLM approved periodic event, under Special Recreation Permitting, with periodic and localized, but short-term noise impacts since 1992. Modifications to the EA were made in response to this comment under Affected Environment, Environmental Consequence, Cumulative Effects, Mitigation and Noise</p> <p>p.135 - BLM added the following information to the EA: " The town of Howard and property owners adjacent to BLM lands at Turkey Rock have experienced direct noise impact on a periodic basis from 14 BLM permitted motorcycle trials bike events since 1992."</p> <p>p.135 - Added following information to EA: Table 10.1: Measured (+) and predicted (-) visitation (staff + guests) at Turkey Rock motorcycle trials bike events permitted on BLM lands, Howard, CO, 1992-2006.</p> <p>p.136 - Added following analysis to EA: "Short-term, direct seasonal noise impacts from BLM approved motorcycle trials bikes events at Turkey Rock would impact the town of Howard and adjacent property owners, on average, once a year under the No Action Alternative, assuming RMTA application and continued BLM approval of Special Recreation Permits."</p> <p>p.137 - Added following analysis to EA: "Under Alternative A, short-term, direct seasonal noise impacts from BLM approved motorcycle trials bikes events at Turkey Rock would impact the town of Howard and adjacent property owners, on average, once a year, assuming RMTA application and continued BLM approval of Special Recreation Permits. The designation of an open trials bike practice area at Turkey Rock could extend direct noise impact to the town of Howard and adjacent property owners beyond single permitted events to a year-round noise source. Year-round noise impacts from motorcycle trials bike practice near the source at Turkey Rock would likely be sporadic and less intense than trials bike events, assuming participation is limited by drive time to Turkey Rock during weekdays. Noise-levels, and potentially user-conflict, could be higher on weekends when trials bike users travel to Turkey Rock from origins more distant such as Colorado Springs and Pueblo."</p> <p>p.137 - Added following analysis to EA: "Under Alternative B, short-term, direct seasonal noise impacts from BLM approved motorcycle trials bikes events at Turkey Rock would impact the town of Howard and adjacent property owners, on average, once a year, assuming RMTA application and continued BLM approval of Special Recreation Permits."</p> <p>p.138 - Added following analysis to EA: "Similar to Alternative A, under Alternative C, short-term, direct seasonal noise impacts from BLM approved motorcycle trials bikes events at Turkey Rock would impact the town of Howard and adjacent property owners, on average, once a year, assuming RMTA application and continued BLM approval of Special Recreation Permits. The designation of an open trials bike practice area at Turkey Rock could extend direct noise impact to the town of Howard and adjacent property owners beyond single permitted events to a year-round noise source. Year-round noise impacts from motorcycle trials bike practice near the source at Turkey Rock would likely be sporadic and less intense than trials bike</p>

events, assuming participation is limited by drive time to Turkey Rock during weekdays. Noise-levels, and potentially user-conflict, could be higher on weekends when trials bike users travel to Turkey Rock from origins more distant such as Colorado Springs and Pueblo."

p.138-139 - Added mitigation - "Mitigation: Mitigations 1-3 would apply to all alternatives. Mitigation 4 would apply to Alternatives A and C.

3.Monitor noise levels of trials bike events and practice area use

4.Develop and apply time of use stipulations for Turkey Rock trials bike practice to reduce noise impacts on adjacent property owners.

The 52 acres at Turkey Rock designated as motorized off route travel limited to motorcycle trials bikes would be monitored for resource impacts and user conflicts. Nothing in the TMP precludes BLM from implementing additional management controls if resource impacts and user conflicts increase substantially in this area.

CommentID	PP
General Comment	One public comment questioned the impact on emergency response and radio communications to federal and county first responders.
Examples	Emergency response and radio communications reception requires all existing roads and trails open
BLM Response	BLM is required to establish communications before taking any necessary emergency response action. BLM maintains discretion on emergency use of all public lands to rapidly respond to events, such as fire. That includes response by non-federal first responders. BLM will authorise forced entry through fencing and/or closed gates in the event of an emergency including but not limited to fire suppression, flooding, airplane crashes, etc. BLM will also provide combination to gates to first responders with the idea that the such information is proprietary.

CommentID

PPP

General Comment

One public comment questioned the adequacy of travel impacts analysis on Lynx habitat in the

Examples

The BLM claims that "Decisions in the TMP will have no effect on lynx" (p. 106) but this conflicts with its earlier analysis – decisions could affect lynx, and different alternatives would affect lynx differently. Instead, the BLM should complete a Biological Assessment, make a "may affect" finding on potential impacts of the TMP, and consult with the U.S. Fish and Wildlife Service in accordance with Section 7 of the Endangered Species Act.

Programmatic Planning Guideline. Determine where high total road densities (>2 miles per square mile) coincide with lynx habitat, and prioritize roads for seasonal restrictions or reclamation

Programmatic Planning Objective. Minimize snow compaction in lynx habitat (Ruediger et al. 2000 at 83).

Map and monitor location and intensity of snow compacting activities . . . that coincide with lynx habitat, to facilitate future evaluation of effects on lynx as information becomes available (Ruediger et al. 2000 at 83).

Page 106 of the EA states that all of the alternatives but No Action (which affects more) will impact 6.1 acres of Brandegee wild buckwheat habitat, and that "Some habitat is still impacted because primary BLM access roads and county roads would be not closed and one main trail would be maintained through the habitat." It is unclear why the BLM would choose to leave a main trail open in this area under every alternative. Instead, the BLM should consider the possibility of closing all BLM-managed routes within buckwheat habitat.

The BLM should clearly cite the research that led to its selection of these buffer distances since they were used to evaluate the amount of disturbance to rare species under each of the alternatives. If dust, pollinator disturbance, and other indirect effects were not considered, the BLM may have greatly underestimated impacts to rare species.

The BLM should also consider strengthening the Mitigation and Cumulative Effects sections for Threatened/Endangered/Sensitive species. Many more mitigation measures are available than have been considered, including speed limits, dust suppression requirements, management of herbicide and pesticide use, salvage of rare species during road maintenance, commitments to maintain natural hydrology and reroute road sediment, etc.

BLM Response

BLM informally consulted with the US Fish and Wildlife Service and received comments on the TMP on 8/20/2007. . Subsequent discussions with Leslie Ellwood (USFWS) resulted in additional language being added to the analysis section (pg 106) to strengthen our determination that implementation of the TMP will have no affect on lynx. A very small amount of potential lynx habitat is affected by roads and trails in the TMP area. The habitat occurs in Kerr Gulch where the primary BLM road accesses BLM and USFS lands through potential habitat. In all the alternatives the primary access road would remain open to motorized traffic. Therefore, Table 7.4 (pg 103) shows some acres of impacted habitat. The difference between all alternatives is 191 acres and the difference between alternatives consists of several short access roads that extend from the primary road. The Kerr gulch road is a low volume road that dead ends at a trail head on the San Isabel National Forest. The road contains many curves, is one lane in many areas and contains steep gradients all of which required users to maintain very low speeds. A traffic counter was installed during the fall of 2006.

During the winter months of December 2006 thru March 2007 a total of 249 vehicles were counted (62 per month). From April 2007 thru July 2007 a total of 871 vehicles were counted (217 per month). Slightly higher numbers could be expected during the fall hunting season, however it is reasonable to project a total of less than 4500 vehicles per year. The low volume of traffic and the low speeds typical of this type of road minimizes the chances of lynx being killed by traffic and demonstrate that the road would not be considered a barrier to lynx movement.

Winter use of the road is light [January 2007 (24) and February 2007 (19)] as snow makes travel in the area risky. Winter snow pack is not reliable or sufficient for the area to become an attraction for snowmobile use. The BLM does not expect travel volume to increase in the near future on the Kerr gulch road.

Data from CNHP (Colorado Natural Heritage Program) was used for analysis of impacts to *Eriogonum brandegeei*. CNHP EOR's (Element Occurrence Records) for Castle Gardens indicates that the plant occurs

on approximately 311 acres in this area. BLM TMP decisions closed 6.5 miles of user created roads/trails in buckwheat habitat. Routes left open occur on the edges of habitat and include routes that have been in existence for many years and only affect 6.1 acres (less than 1% of the habitat).

BLM discussed CNE's comments with CNHP. CNHP believes that conservation of the plant will be accomplished with the restrictions that BLM can place on the area. The 6.1 acres of habitat affected occur on the edge of the population and not in the center of the population. BLM is committed to managing the routes in habitat using informational signs, fences, barriers and other methods to prevent future impacts to the plant and to prevent possible encroachment into the core area of habitat.

BLM agrees that the Mitigation Section of the EA could be strengthened as it related to rare plants. We will add to the EA (pg 107) the following language: Other potential mitigations to prevent affects to rare plants include implementing speed limits, requiring dust suppression, managing herbicide and pesticide use, maintaining natural hydrology and rerouting road sediments in sensitive areas.

CommentID	PPPP
General Comment	Public comments questioned whether the proposed 100 foot parking restrictions in Alternative C would effectively reduce resource damage.
Examples	We feel the plan perhaps does not go far enough in allowing travel 100 feet off routes for dispersed camping. As this use becomes more popular, this opens a loophole for the creation of more user created routes.
BLM Response	<p>BLM agrees off-route travel has negative effects natural resources such as soils and water.</p> <p>BLM's analysis shows that reducing the allowance for off-route travel for camping, parking and other uses from 300 to 100 feet would reduce impacts. BLM has the authority to further restrict off-route travel if the "100 foot rule" is not sufficient to protect resources.</p>

CommentID Q

General Comment One public comment questioned whether the EA considered OHV volume and change in the Proposed Action. The comment requested clarification on Administrative Use. The comment questioned the time allowed for public comment.

Examples

1) A plan should predict the changes in use over time, such as which uses are growing, and how this growth will be dealt with (Increased riding opportunities?). I see nothing in your "Plan" that does either. A "Plan" should recognize the aging population and their trends in outdoor recreation.

2) Given the vast amount of time it took the BLM to compile these "Plans", the comment period was grossly inadequate. While I ride in the area and will continue to do so, it would take months to ride, evaluate and then comment on all the routes in question.

Any "Plan" should favor groups that are willing to share trails, and should not favor those who demand exclusive use. This "Plan" does not seem to recognize this.

6) I am not able to determine by the map if the public is able to use all the miles of roads marked as "Administrative".

BLM Response BLM Response Point 1. The Travel Management Plan considered changes in recreational use over time as a foundation trend and assumption in the environmental analysis (see p.16), on environmental consequences of increased routes and traffic to air quality (p.35) , water quality (p.63), wetlands and riparian zones (p.79), aquatic wildlife (p.108), and terrestrial wildlife (p.117). Analysis of recreation use trends in the EA forms the basis of affected environment discussion and and impacts of travel management decisions on achieving and sustaining recreation settings and providing targeted recreation opportunities (p.143)

BLM Response Point 2: BLM Royal Gorge Field office abides by BLM NEPA guidelines that require a minimum 30-day public review and comment period for an environmental assessment. BLM Royal Gorge Field Office extended the comment period for the Arkansas River Travel Management Plan by an additional two weeks.

BLM Response Point 6: Definition of Administrative Access (AA) routes on Maps 9,12-14 is defined in Descriptions of the Alternatives on Table 1 - Travel Use Categories (p.22-23); Routes included in the Administrative Access category are not available to the general public for motorized or mechanized uses. AA routes are needed to provide administrative access for BLM personnel and authorized holders of permits and right-of-ways, and will continue to be used for administrative purposes. The routes included in the AA category are not managed for specific recreation uses but, as long as the routes are legally accessible (not blocked by private lands), they are available to the public for foot and horse travel.

Capacity question - DOT Level of Service; Add reference: JK Bowker, DBK English, HK Cordell, Projections of Outdoor Recreation Participation to 2050

CommentID	QQ
General Comment	Several public comments defined a need for defined winter season OHV riding areas on BLM lands in the planning area
Examples	<p>There are not very many other places to go during the winter and we need more trails and more open access for all users, not less.</p> <p>Please leave all trails in the texas creek, cotopaxi, coaldale and howard areas opent to ohv travel. This is our only area for winter riding.</p>
BLM Response	<p>BLM recreational travel is permitted year round on designated routes under the Proposed Action (Alternative C). BLM maintains discretion to temporarily close roads and trails under wet weather conditions to prevent resource damage. BLM traffic data does not show increased winter use. If areas for winter OHV use were in high demand, BLM would expect higher traffic counts and increasing winter use at Texas Creek during the winter months. Traffic counter data collected at Texas Creek shows the lowest levels of use during the winter months (November through March). The level of use during these months has not increased significantly over the past seven years. From 2000-2006, traffic counter data shows the highest levels of use recorded from April through August. For 4 out of those 7 years, July was the month with the highest use.</p>

CommentID RR

General Comment Public comments addressed travel management impacts to Wilderness Study Areas and BLM Interim Management Policy of those areas.

Examples A related question is to be assured that the US Forest Service and the State of Colorado have been consulted with concerning any consequences your proposed changes might cause in management of adjacent public lands,

I would however like to see the document (or regulations) make it clear that positive evidence of designation must be on the ground (for example a sign indicating acceptable uses) before the permitted user can proceed.

I could not find a description of “individual activity plan(s)”; how would these be done (and what level of public input would be accepted) and is there concern that they could compromise the spirit of decisions made in the overall TMP?

You explain how there are four WSAs within the planning unit but you also note that three of them (Upper and Lower Grape Creek and MacIntyre Hills) were not actually recommended for Wilderness designation (only Browns Canyon was). Can you clarify whether or not that finding has any effect on your obligation to manage these areas as if they were actually legislative wilderness?

I take note and approve of the proposal’s reference to closure (and restoration?) of user-created routes within the existing WSAs; I would appreciate seeing a statement that commits the BLM to taking necessary future management action to ensure such closures are respected.

I would like to have it clarified whether or not a user is within 100 ft if it is or is not acceptable to create (new) resource damage; if it is not, then your rule would be a powerful tool to ensure that existing dispersed camping sites do not simply grow every year by the 100ft implied by your new regulation.

BLM Response All designated routes will be signed on site in accordance with Colorado Inter-Agency Travel Management Sign Standards. Implementing travel plans includes signs, maps, education, maintenance, construction, reconstruction, closures, field presence, law enforcement, and monitoring. Refer to p. 169, Mitigation Common to All Alternatives.

All WSA's are managed in accordance with the Interim Management Policy for Lands Under Wilderness Review (IMP) to maintain wilderness values. BLM's recommendation on the area's suitability for wilderness designation does not affect current management.

The IMP also directs BLM to maintain wilderness values by regularly monitoring WSAs to prevent unauthorized uses, such as motorized and mechanized vehicle use. RGFO regularly monitors all WSAs. Closure of user created routes in WSAs and enforcement of these closures is part of travel management plan implementation.

RGFO has completed few individual activity plans; however, the activity planning process tiers to existing decisions from the Resource Management Plan and other plans (i.e. Travel Management Plans) that pertain to the area affected by the activity plan. The scope and complexity of the planning effort would determine the level of public input to the process; however, an Environmental Assessment is prepared as part of the process.

CommentID

S

General Comment

Numerous public comments addressed mountain biking trail proposals in the Salida travel planning sub-unit under Alternatives A and C. Two comments expressed concern that BLM designation of mountain bike trails leading to USFS lands will impede natural resource planning and management on adjacent public lands.

Examples

I grew up in Salida and have been biking here since 1989. I am excited to see the BLM going through this planning process as I believe that land planning is a significant tool for future use patterns. I am encouraged by the emphasis that the BLM has given to public input in the planning process.

The Salida subunit plan can be pivotal to the continued growth of cycling in the area. As our country moves away from fossil fuel and more people take to cycling as a cost efficient means of transportation there will inevitably be more avid cyclists that wish to ride in the hills surrounding Salida. Their proximity to the town means that, unfortunately, trails will be expanded and created with or without the BLM's blessings.

BLM Response

BLM recognizes sport mountain biking and cyclists as an integral, and growing, recreation and multiple use of the public land in the travel planning area. BLM assessed variations of a non-motorized, single-track trail network in the Salida travel planning sub-unit as proposed by Salida Mountain Trails (Map 6) in Alternatives A and C (Proposed Action) in the EA. Between 2003-2007, BLM discussed the Salida Mountain Trails proposal with partner agencies including USFS, CDOW, Chaffee County, and others.

BLM assessed all proposed trails in Alternative A and a portion of the trails, excluding the proposed Dead Goat Gulch Loop (S), Sweetwater Gulch Loop (U), and western Little Rainbow (T & R) in Alternative C. BLM evaluated the alternatives referencing BLM Colorado Standards for Public Lands Health (Appendix 5), Desired Future Conditions (p. 13, Appendix 2) for the Salida sub-unit, issues of recreation management and user-conflict, as well as direct, indirect, and cumulative environmental effects of the proposed single-track trails on soils, water, wildlife, air quality as well as other resource values.

The location and reach of the proposed Dead Gulch and Sweetwater Loops in Alternative A would challenge BLM Colorado Standards for Public Lands Health on animal communities (Standard 3), specifically habitat fragmentation and wildlife movement corridors in the rapidly urbanizing Salida vicinity. Slope, soil substrate, and erosion risk along the proposed western section of Little Rainbow, would also pose direct impact and maintenance costs to ensure that Standard 1 for Upland Soils could be met.

Conversely, given the location and reach the remaining trails proposed by Salida Mountain Trails, BLM agrees that designation and construction of this non-motorized trail system can meet BLM Colorado Standards for Public Lands Health while providing beneficial recreational, social, and economic value to the people of Chaffee County and beyond.

BLM accepts the prior need for USFS completion of NEPA environmental review and decision. BLM accepts inter-agency public comment to close segments of those proposed mechanized, single-track trails connected and leading to user-created trails on lands managed by the Salida Ranger District of the San Isabel National Forest until USFS NEPA action is complete. BLM recommends direct Salida Mountain Trails coordination with USFS staff at the Salida Ranger District PSICC on those trails. BLM is coordinating with the Salida Ranger District on trails and roads that connect with the National Forest. BLM has not found adverse impacts on the environment from the segments of those trails that traverse BLM lands following conditions set forward in Appendix 7 of the EA.

Leah Quesenberry, the Recreational Planner for the BLM Royal Gorge Field Office, met with Mike Sugaski, Forest Service Recreation Planner, Tom Purvis and Larry Kovacic, plus two additional representatives of Salida Mountain Trails on 09/27/2007. Ms. Quesenberry explained to Mr. Sugaski that a letter, to Bill Schuckert, requesting commitment to evaluate mountain bike trails that transverse BLM property but begin and/or end on Forest Service property was forthcoming. Mike felt that without significant pressure and interest from the community this subject would not be considered high priority. The meeting ranked six trails in the following order of priority; Cottonwood and Columbine are top priority, followed by Blood, Guts and King Gulch which are lower priority, to The Cache which isn't really a priority. On 10/12/2007 BLM received formal response from USFS District Ranger William Schuckert requesting BLM deferral of decision on these six mountain bike trail segments until December, 2008. On 11/13/2007 Roy Masinton, Joe Vieira and John Dow consulted Bill Schuckert. The Forest Service requests time to complete NEPA analysis on the segments of those routes that run through Forest Service lands. BLM consulted with Salida Mountain Trails on 11/13/2007 on BLM's need to close those segments until the Forest Service NEPA process is complete.

CommentID

SSS

General Comment

Several public comments addressed specific CMTRA trail proposals and environmental impacts under Alternative A, encouraged wet weather closures

Examples

Resolving issues with non-maintained county roads is important. However, each route in question should be analyzed as to whether it is really needed for access, particularly if the proposed solution would be incorporating the roads into BLM's system.

Closure of the target shooting areas at Turkey Rock and Salida (in both A and C) is a reasonable and necessary action for public safety and reduction of habitat destruction and noise.

A-3 ATV/motorcycle trail.

I strongly oppose the A-3 trail. Reopening this trail that was closed in 1998 would greatly expand the motorized area beyond the currently OHV open areas, would require rerouting to avoid riparian habitat, and have an adverse effect on wildlife. Maverick Gulch is an important riparian zone, there are at least two springs (Maverick Gulch #1 and #2) that would need additional protection, and the trail would intrude into the bighorn sheep lambing area which is an unacceptable impact on wildlife. Opening this area to motorized travel will reduce the amount of vegetation and increase sediment into the tributaries of the Arkansas River.

S-1 Single track motorcycle trail.

I very strongly oppose the S-1 trail. Completely new construction of 7.6 miles of single-track trail through an extremely rugged part of East Gulch is just not acceptable. It is clear that the proponents in submitting their proposal had not actually explored the area, and the ruggedness of the terrain is born out by my own brief experience in hiking just a short distance on the upper area, as well as by BLM staff who attempted to trace the route. The expenses and technical difficulty of construction along the purported route would be a very unwise use of resources. In addition it would greatly expand motorized use beyond the current OHV open areas located several miles to the west, and potentially provide access into Big Hole. More important would be the impact on a currently roadless area which is a large core wildlife habitat area that extends eastward into the Big Hole Subunit. Large core areas with low routes density and good wildlife habitat are hard to come by, and with the heavy motorized impact to the west of the main road, it is vital that this area remain intact. As BLM knows, the suggest trail location is in an area proposed for Wilderness in the Wild Ten and Wild Connections Conservation Plan, recommendations that were based on extensive studies of the wilderness qualities, wildlife habitat, riparian resources and quiet recreation potential.

S-2 Expert motorcycle trail.

I strongly oppose the S-2 trail. Reopening this trail between Reese Gulch and Red Gulch to accommodate a few expert motorcycle riders is not acceptable in light of the inevitable damages to riparian habitat, Fernleaf Gulch environs, water quality and wildlife, including a bighorn sheep lambing area. The extensive mitigation measures that would be needed are very expensive, and in addition this would expand motorized use beyond the current OHV open areas. I support BLM's decision to not include S-2 in Alternative C.

Sangres Foothills Subunit

- o BLM routes 1276, 1296, and 1269 in the Sangres Foothills Subunit are often duplicative or short spur. These are left open in Alternative A, and I believe that the sedimentation from the whole complex of routes in that area is harmful to water quality. I recommend that this decision be reviewed.
- o BLM route 212 crosses a large sand gulch and deadends at private property. The damage caused by sand play and the potential trespass into private land, as well as less impact on adjacent elk wintering grounds would recommend that this route be closed. I recommend that this decision be reviewed.
- o BLM route 422 that would be reopened in Alternative A also ends at the private property noted for Route 212 and is located in elk winter range with the potential for wildlife impacts. I recommend that this decision be reviewed.
- o Alternative A would open 430 and 210 for motorcycle use that have been in the past and would continue to be restricted to administrative use under the Preferred Alternative. These routes duplicate a similar route to the west, both of which are close to the Sangre de Cristo Wilderness, lynx habitat and are located in an elk winter concentration and migration area that will have negative impacts on elk that are trying to move to lower elevations.

o I Support the BLM's decision to close BLM routes 431 and 433 that are near to lynx habitat on BLM lands and in the adjacent Sangre de Cristo Wilderness, and are located in an elk winter concentration and migration area.

Road Gulch Subunit

The proposed Action Alternative C limits BLM routes 714, 495, 52 and part of 72 to horse use or are closed to all use. I support this action and oppose opening these routes to motorcycle use. Their proximity to the McIntyre Hills Wilderness Study Area makes them good candidates for equestrian use, and allowing motorcycles increases the risk of motorized intrusion into the WSA.

The use of seasonal and temporary closures should be pursued on all travel routes in wet seasons or unusually inclement weather.

BLM Response

Agreements regarding unmaintained county roads would only be pursued where it is critical to the transportation system on public lands.

BLM concurs on the target shooting closures.

A-3 trail is not included in the Proposed Action.

S-1 trail will only be analyzed when and if the proponents provide BLM with a detailed proposal.

S-2 trail is not included in the Proposed Action.

Sangres Foothills subunit routes 1276, 1296, and 1269 not included in the Proposed Action.

Road Gulch subunit routes -- BLM concurs.

Seasonal and temporary closures on all travel routes in wet seasons or unusually inclement weather would be costly to implement with negligible benefits to resources. RFGO has implemented several temporary closures in areas where impacts to resources, damage to roads, and visitor safety are important issues. Some, but not all, routes in the Arkansas River TMP may warrant this level of management control.

CommentID

T

General Comment

A couple of public comments addressed public lands grazing and associated impacts to recreational travel

Examples

One comment I have regarding this area is when horseback riding in the past there were a number of cattle using this area Will this area be open for cattle grazing?

BLM Response

BLM recognizes that grazing is a multiple use of public lands consistent with the Federal Lands Management Policy Act, impacted by, and occurring concurrently with recreational travel. The Arkansas River Travel Management Plan Environmental Assessment (EA) addressed travel management alternatives on grazing or livestock management in the context of affected environment and cumulative impacts concerning road and trail use (p.139).

The EA identified drivers of noxious weed spread and differences in risk of weed seed dispersal, as measured by route mileage and potential weed establishment from vehicle treads, between the No Action and Alternatives A, B, and C (p.43). Under the Proposed Action, assuming recovery and regeneration of native plant cover along on closed unauthorized routes, BLM projects that the risk of potential weed spread, although not eliminated, would be reduced over the No Action.

Under the proposed action, grazing permittee use of designated roads and trails will be consistent with off-road motorized travel restrictions in place for the general public. However, grazing permittees will additionally maintain existing motorized travel access for grazing allotment management and operations along designated BLM administrative roads identified in Map 9.

CommentID	TT
General Comment	Several comments defined a need for designation more pedestrian and mountain bike trails in the travel management plan.
Examples	<p>I think the ideal situation would be to preserve a pedestrian and non-motorized corridor along grape creek.</p> <p>The rail bed north of Temple Canyon Park to the Ecology park appears significantly more overgrown than the trail south of Temple Canyon Park. The value of a non-motorized connection between the two city parks seems self-evident, and, as you said, nothing in the TMP appears to prohibit the future development of such a connection.</p> <p>Establishing a non-motorized corridor along or near the historical rail bed would preserve access through the canyon, and is not without precedent in designated Wilderness areas or WSA's. The BLM policy with regard to WSA's, as I understand it, allows it discretion in creating designated routes that allow bicycle use.</p>
BLM Response	<p>Alternative C provides for a designated trail on public land throughout the Grape Creek corridor. However, BLM does not plan to construct new trail in Grape Creek. The portions of the trail within the Upper and Lower Grape Creek WSAs are open to foot and equestrian use.</p> <p>BLM has very limited discretion in designating trails for mountain bike use in WSAs. The Interim Management Policy for Lands Under Wilderness Review (IMP) states, "To foster efficient wilderness management, it is BLM's policy to minimize the establishment of new discretionary uses in WSAs that would be incompatible with possible wilderness designation, even when the uses would not in themselves exceed the nonimpairment standard." The designation of the trail through Grape Creek for mountain bike use would fall into the definition of a new discretionary use within the two WSAs.</p> <p>Further, the historic railroad grade through Grape Creek is not continuous and its designation for mountain bike use would necessitate trail construction and maintenance to prevent resource damage. The IMP states, "No new, permanent recreational ways, trails, structures, or installations will be permitted, except those that are the minimum necessary for public health and safety in the use and enjoyment of the public lands' wilderness values, and that are necessary to protect wilderness resource values."</p> <p>The portion of the Grape Creek trail that is open to mountain bikes is from the Ecology Park to the Arkansas River because this is outside of the WSAs and the vegetation and terrain are suited to mountain bike use.</p>

CommentID U

General Comment Public comments expressed concern about long-term natural resource damage from OHV recreation on public lands

Examples I run into many OHV's off the trails and the damage they do takes forever to go away

BLM Response BLM is clear regarding public concern for off-highway vehicle impacts on soils, water, wildlife, wetlands and other resources on the public lands (see issues and concerns p.7-11, affected environment and environmental consequence sections in the EA, and Appendix 2).

BLM also recognizes the recreational, social, and economic value that motorized recreation provides to a growing number of the public. In the environmental assessment, BLM considered recreational travel opportunity and environmental impact in 14 geographic travel planning sub-units in the 500,000 acre planning area. Four alternatives were compared to determine where and how motorized use could be accommodated.

BLM Interdisciplinary Team NEPA environmental assessment and travel network analysis was completed referencing BLM Colorado Standards for Public Lands Health (Appendix 5), BLM Recreation Management Guidelines (Appendix 11), and Desired Future Conditions (DFC's, p.13 and Appendix 2). BLM developed DFC's via public process for specific geographic travel planning sub-units, considering existing, and proposed recreational travel networks.

Under the Proposed Action (Alternative C), BLM seeks to maintain and augment motorized recreational opportunity in the Texas Creek sub-unit, while also addressing and mitigating direct environmental impacts and user-conflicts via guidelines identified in Appendix 6 of the EA.

BLM evaluated Colorado Motorcycle Trail Riders (CMTRA) association proposed trails A-1, A-2, A-3, A-5 and S-1 (Map 5) in Alternative A and CMTRA proposed trails A-2 and A-5 in Alternative C to determine the direct, indirect, and cumulative impacts of such an expanded network.

BLM natural resources staff determined that BLM Colorado Public Lands Health Standards for riparian systems (Standard 2) and animal communities (Standard 3) and Desired Future Conditions for the Texas Creek Subunit could be met under Alternative C but not under Alternative A.

Specifically indicators for landscape connectivity and habitat fragmentation could not be sustained by the designation of routes A-1, A-3, A-5. BLM determines in this EA that designation, construction, and motorized traffic along said routes would result in encroachment and fragmentation of biologically critical riparian systems and key upland-river deer and elk corridors in the Fernleaf, Maverick, and East Gulches where said proposed routes would be constructed.

CommentID UU

General Comment Numerous public comments questioned the impact of parking restrictions and off-road travel on game retrieval and hunter recreation.

Examples Actually, I would like to see the regs relaxed to allow hunters to drive more than 300 feet off roads to retrieve game. Game doesn't automatically drop within such boundaries, and some hunters, especially older hunters, need to be able to use vehicles to get to the animal.

BLM Response There are different methods to retrieve game that do not require off route motorized travel.

BLM is not aware of any research that shows that limiting off route travel by motorized vehicles for game retrieval significantly decreases participation of older, infirm or disabled individuals in hunting.

CommentID	V
General Comment	Public comments expressed concern that OHV designations in the Arkansas River Travel Management Plan Alternative C restrict regional supply of single- and multiple-day motorized riding opportunities. Several public comments referenced closure of OHV riding areas in the Colorado Front Range and cumulative impacts to motorized riding opportunities as a reason to expand motorized trails in the Texas Creek sub-unit
Examples	<p>There are too few areas left now for motorcycle trail riders. So much of the public land in Colorado is now closed to OHV use. I would really like an expanded trail system that would allow more than a day trip.</p> <p>With closure of the private land in Pueblo, multi-use access has been seriously diminished in the past year for the many users in the Pueblo and Colorado Springs areas.</p>
BLM Response	<p>Refer to Map 11, Regional Motorized Recreational Areas. The Pueblo Motorsports Park closed 700 acres that was open to dirt bikes and ATVs. Because of its limited size, BLM did not consider the Pueblo Motorsports Park as a significant part of the Regional Motorized Recreation Areas. Route designations in the Proposed Action (Alternative C) and Action Alternatives (A and B) considered in the Arkansas River Travel Management Plan EA would have a negligible impact on total available motorized mileage in the region. The majority of public lands in Colorado are available for motorized recreation. There are several motorized trail systems within the Front Range area. These trail systems provide a variety of trail experiences.</p> <p>Providing additional motorcycle trail riding opportunities at Texas Creek was considered and analyzed as part of Alternative A and C. In addition to assessing proposed motorcycle trails in the EA, BLM reviewed regional supply of motorized recreational areas and travel networks on public lands in 8 areas adjacent to the TMP planning area. In response to the public comment, BLM references the hundreds of miles of BLM and USFS system motorized routes in those areas that are presently available for single and multiple day-trips for motorized recreational travel.</p> <p>As measured by total available system roads on BLM and USFS lands, BLM does not agree that a scarcity of motorized recreational opportunity exists in the planning region for motorcyclists, ATV/Quad trail riders, or 4x4 enthusiasts. Numerous recreational travel opportunities for motorcycle trail riders remain within a 30-minute drive time from Canon City, Salida, and Buena Vista and a 2-4 hr drive time from population centers in greater Denver, Colorado Springs, and Pueblo.</p> <p>The extent and reach of motorized roads and trails in the planning region is publicly available via BLM, USFS, and private map sources. Abundant motorcycle road and trail riding opportunities in central Colorado, including but not limited to those assessed in this EA, remain for public motorized use and may be accessed from Highway 285, 24, 115, and 5.</p>

CommentID	VV
General Comment	Several comments referenced results and conclusions from previous environmental assessment of OHV roads and trails in the Texas Creek area.
Examples	It is also appropriate to create some additional trails and routes to handle increased use where this does not unduly impact the land. However, I see no reason to believe that the 1998 Environmental Assessment for the Texas Creek Trail construction and Maintenance Project (CO-0570980127 EA) was flawed or inaccurate.
BLM Response	BLM assessed natural resource impacts that would result from Colorado Motorcycle Trail Riders Association (CMTRA) proposed trails in the Fernleaf gulch area in the EA under Alternative A. BLM concurs that environmental assessment in the current NEPA action verifies the direct, indirect, and cumulative impacts that were previously documented in the 1998 Texas Creek Environmental Assessment (CO-057-098-0127). BLM maintains that expansion of the motorized trail system into this sensitive area does not meet the public interest in maintaining Colorado Standards for Public Lands Health

CommentID W

General Comment One comment proposed user-fees as an alternative to road and trail closures in Alternatives A, B, and C.

Examples I am strongly against closing this area to vehicle traffic. I would rather see you impose an access fee on people who wanted to use those roads. While collecting that access fee, you could emphasize the need for people to stay on existing trails. And then use the funds to enforce those rules.

BLM Response BLM cannot charge fees for access to public lands. The implementation of recreation fees on public lands is guided by the Federal Lands Recreation Enhancement Act (FLREA) passed by the US Congress and BLM Special Recreation Permit policy. At the present time, BLM is not proposing to charge recreation fees at Texas Creek -- in part, because the area would not meet the requirements for facilities that were established in FLREA.

CommentID WW

General Comment One comment questioned BLM's use of the limited to vehicle type designation at Turkey Rock and recommended use of Special Recreation Permits and elimination of Open designation for motorcycle trials bikes

Examples Limited designation should be applied to designated routes in addition to vehicle types. Turkey Rock should be managed as a Special Recreation Permit site. Trials bike practice area

BLM Response BLM presently manages motorcycle trials events as Special Recreation Permits at Turkey Rock. The proposal is to define Turkey Rock as a practice area. BLM contacted BLM Rio Puerco district at considers the the situation at Turkey Rock distinct in terms of area of impact. BLM believes that the reduction of open motorcycle trials bike use to 52 acres at Turkey Rock prevents resource damage from expanding outside that specific area. BLM will monitor resource use and impacts at Turkey Rock and maintains discretion to establish stricter guidelines should trials bike practice use lead to higher impacts.

BLM will work closely with Colorado Motorcycle Trail Riders Association to further define trials bike event and practice routes. However, BLM considers designating vehicle use to motorcycle trials bikes necessary presently to insure that vehicle use over time does not migrate to larger axle vehicles.

CommentID	X
General Comment	Some comments expressed criticism of travel planning networks and OHV area linkages in the Proposed Alternative C.
Examples	Poor job of linking OHV areas together. Short distance trails does not enhance the OHV experience. Linking areas properly together should actually create fewer problems as users have a better area to ride, and less reasons to create new trails.
BLM Response	<p>BLM must balance the demand for all types of recreation opportunities with public land health considerations. Quality of undisturbed wildlife habitat is one such consideration and BLM is committed to preventing fragmentation of wildlife habitat when possible. Colorado's wildlife does better in larger blocks of undisturbed habitat rather than smaller fragmented pieces. Habitat fragmentation is also considered to be the greatest threat to biological diversity. Determining when a road or trail causes habitat fragmentation and how it contributes to a reduction in biological diversity is extremely difficult. Nevertheless, protecting large, undisturbed areas of wildlife habitat was considered when decisions were made concerning travel management in the Arkansas River travel planning area.</p> <p>Preventing fragmentation maintains wildlife movement corridors. Corridor use by wildlife is influenced by topography, vegetation, species of interest and nearby human activities. A wildlife corridor should serve to provide for several functions such as providing wide-ranging animals an opportunity to travel, migrate and meet mates, allow plants to propagate, provide for genetic interchange, allow for populations to move in response to environmental changes, and to allow for individuals to re-colonize habitats. Corridors are needed to maintain connectivity among formally contiguous habitats.</p> <p>The Fernleaf Gulch drainage between Texas Creek and Red Gulch is one such wildlife corridor. Linking of OHV trails in the Texas Creek and Red Gulch subunits was considered and analyzed in Alternative A but were not included in Alternative C (Proposed Action) due to impacts to resources.</p> <p>Many of the existing routes in Texas Creek that remain open to motorized use under Alternative C were user-created routes. In the 1998 EA, some were allowed to remain open and others were closed to protect resources. All routes were analyzed in the current EA.</p>

CommentID	Y
General Comment	Several public comments expressed concern that the Porposed Action (Alternative C) closed all or large portions of the Texas Creek OHV riding area.
Examples	<p>In regards to the recent debate about closing approx. 55 miles of trails in the texas creek area. I respectfully ask you to consider not closing these trails.</p> <p>Please don't close down the best trails to motorized traffic.</p> <p>While I believe you are doing the right things, I also believe the public lands are just that, and you are strangling use too much. While I do not live in the west, I have visited, and want to again. To say 'no hunting', 'no shooting', is not sane, and not fair.</p>
BLM Response	<p>BLM's proposed alternative (Alternative C) maintains popular motorized routes in the Texas Creek, Kerr Gulch, Road Gulch, Badger Creek, and Crampton Mountain sub-units. BLM's proposed action expands motorized mileage in the Texas Creek and Crampton Mountain sub-units. BLM route designations in Alternatives A, B, and C (Proposed Action) all specify vehicle class including designations and trails that are specific to ATVs and motorcycles (see Map 9 - Texas Creek).</p> <p>Alternative C (Proposed Action) proposes 38.3 miles of routes for motorized use in the Texas Creek area. Currently, there are 37.6 miles of routes available for motorized use. BLM's Proposed Action would slightly increase the mileage of routes available to motorized use over the existing condition. Many of the trails proposed for closure in the entire planning area are user-created routes or routes with no legal public access. Some routes would be closed for resource impacts.</p>

CommentID Z

General Comment Numerous public comments differed with BLM's proposed Alternative C and route designations in the Texas Creek sub-unit, and proposed further mitigations to allow motorcycle trail development into the Fernleaf and Maverick Gulch areas.

Examples In response to the Arkansas River Travel Management Plan, I support the specific proposals (enclosed) put forth by the Colorado Motorcycle Trail Riders (CMTRA) for trail improvements in the Texas Creek Trail system.

BLM Response The Texas Creek OHV area encompasses a large area of public land with wide variety of habitat types. Water flows in Fernleaf Gulch, Maverick Gulch, East Gulch and numerous springs, seeps and intermittent creeks are present. Due to the variety of habitats present many wildlife species common in Fremont County are found in this area. This area of public land is one of the last large blocks of public land with relatively little access in the county. This contiguous, unfragmented block of habitat is extremely valuable as wildlife habitat because so few areas remain due to human development on private land and recreational demands on public lands.

The proposed OHV trail system traverses several habitat types from low elevations to high elevation. Critical elk, deer and bighorn sheep habitat is found in the area. Impacts to wildlife species and habitat can be described as direct or indirect. Direct impacts are those that affect a species or habitat directly: loss of browse due to a trail or road constructed through habitat, streamside riparian vegetation compacted and destroyed from OHV use, etc. Indirect impacts occur when actual damage to habitat is absent. Animals, however, avoid areas of suitable habitat due to the disturbance associated with human uses. Research has demonstrated that roads and trails have an impact on the ability of wildlife to utilize habitat adjacent to these "high use" areas. Wildlife use can be affected within 1/4 mile on either side of an existing road or trail (Perry and Overly, 1977 in "Impact of Roads on big game distribution in portions of the Blue Mountains of Washington, Wash. Game Dept. Appl. Res. Sect., Bull. 11, 39pp, and Rost and Bailey, 1979 in "Distribution of mule deer and elk in relation to roads", J. Wildl. Manage., 43(3):634-641).

A review of the OHV proposal and a field trip to the area by the Front Range Resource Advisory Council on March 18, 1999 resulted in the following recommendation: "There should be no more roads or trails in the west half of the OHV area which is designated as "limited" use, to protect wildlife habitat and the wildlife".... (Front Range RAC Meeting minutes of 3/18/99).