

# **US Department of the Interior**

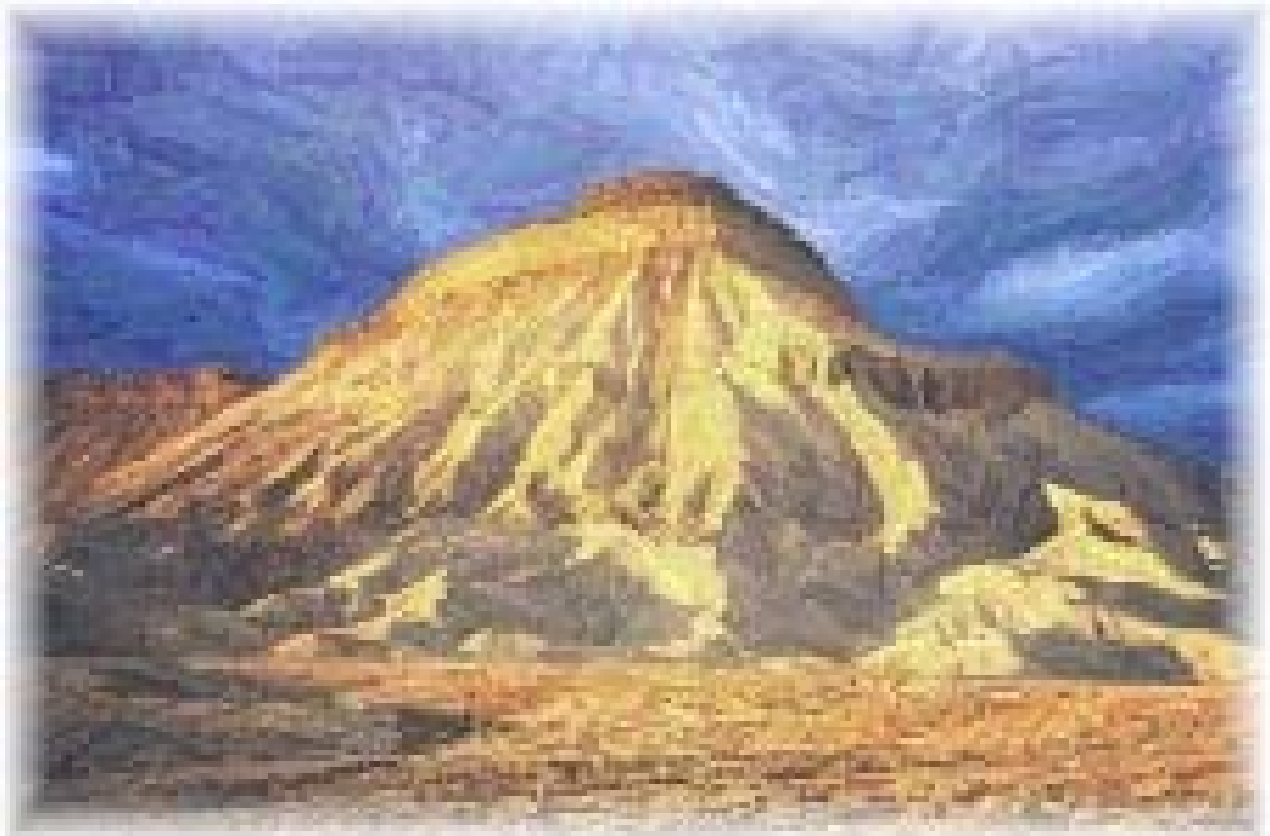
Bureau of Land Management



## **Grand Junction Field Office, Colorado Resource Management Plan Revision**

Scoping Summary Report

April 2009



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# SUMMARY

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The United States Department of the Interior, Bureau of Land Management (BLM) is preparing a Resource Management Plan (RMP) for public lands administered by the Grand Junction Field Office (GJFO) in western Colorado. The RMP will replace the 1987 RMP and subsequent amendments, and the environmental effects of the RMP will be evaluated in an environmental impact statement (EIS) prior to plan implementation.

Public involvement is a vital component of an effective RMP/EIS process. Public involvement for the GJFO RMP includes public scoping and outreach; outreach to local communities in the form of a community assessment; collaboration with federal, state, local, and tribal governments and a Resource Advisory Council; and public review of and comment on the Draft RMP/EIS. This report documents the results of the public and agency scoping and outreach process.

## **PUBLIC SCOPING ACTIVITIES**

The formal public scoping process for the GJFO RMP/EIS began on October 15, 2008, with the publication of a Notice of Intent (NOI) in the *Federal Register*, and ended on January 9, 2009. Public outreach during this scoping period has included: 1) a newsletter mailed to over 600 agency officials, organizations, and members of the public; 2) three scoping open houses in December 2008 in Grand Junction and Collbran, Colorado, and in Moab, Utah; and 3) a public Web site, <http://www.blm.gov/co/st/en/fo/gjfo/rmp>, which provides access to materials distributed at scoping meetings, as well as information on the public involvement process.

## **PUBLIC SCOPING RESULTS**

The BLM received 149 unique written submissions containing 953 separate comments during the public scoping period. Comments were categorized, coded, entered into a database, tallied, and analyzed. Categories included RMP process categories, planning issues, and commentor affiliation.

Members of the general public provided 63.8 percent of the comments received during the scoping period, commercial businesses submitted 14.1 percent, and non-profit or citizen groups submitted 13.4 percent. Federal agencies submitted 3 written submissions (2.0 percent), state agencies submitted 2 written submissions (1.3 percent), and local governmental agencies submitted 8 written submissions (5.4 percent), for a total of 8.7 percent of the submissions from government. No written submissions were received from tribal governments or organizations or elected officials.

## ISSUE SUMMARY

Based on internal (within GJFO) and external scoping, the following planning issues have been identified and are presented in descending order of the number of comments received:

- Travel Management;
- Energy Development;
- Recreation Management;
- Lands and Realty / Community Growth and Expansion;
- Fish and Wildlife;
- Special Designation Areas;
- Wilderness Study Areas and Lands With Wilderness Characteristics;
- Water, Soil, and Riparian Areas;
- Special Status Species Management;
- Vegetation Management;
- Air Quality;
- Livestock Grazing;
- Cultural, Heritage, and Paleontological Resources and Native American Religious Concerns;
- Social and Economic Considerations;
- Public Health and Safety;
- Noise; and
- Drought Management / Climate Change.

The BLM will use the planning issues to help guide the development of a reasonable range of alternative management strategies for the RMP. In addition to planning issues, comments also addressed issues that are policy or administrative actions; issues that have been or will be addressed by the GJFO outside of the RMP; and issues that are outside the scope of the RMP.

**FUTURE STEPS**

Scoping is the first opportunity for public involvement in the RMP process. The GJFO will use the information collected during the scoping period to formulate alternatives and prepare the Draft RMP/EIS, which is anticipated to be published in late 2010. Release of the Draft RMP/EIS will be announced in a Notice of Availability in the *Federal Register* and in the local media, and additional public meetings will be held to solicit public comment on the draft document. At the conclusion of the public comment period, the Draft RMP/EIS will be revised, and a Proposed RMP/Final EIS will be published and made available for public review. While these are the specific opportunities for public involvement during the RMP process, the BLM welcomes input from the public on the RMP process at any time.

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# CONTENTS

Section

Page

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<b>SUMMARY .....</b>	<b>S-I</b>
<b>I. INTRODUCTION.....</b>	<b>1-1</b>
1.1 Overview of Public Involvement Requirements.....	1-1
1.2 Overview of the RMP/EIS Public Involvement Process.....	1-2
1.3 Purpose of and Need for the Resource Management Plan .....	1-3
1.4 Description of the RMP Planning Area .....	1-3
1.5 Description of the Scoping Process .....	1-4
1.5.1 Notice of Intent .....	1-4
1.5.2 Project Web Site.....	1-4
1.5.3 Newsletter .....	1-4
1.5.4 News Release .....	1-6
1.5.5 Scoping Open Houses .....	1-6
1.5.6 Mailing List.....	1-6
1.6 Collaborative Involvement Process.....	1-7
1.6.1 Community Assessment .....	1-7
1.6.2 Cooperating Agency Collaboration.....	1-7
1.6.3 Resource Advisory Council.....	1-8
1.7 Collaboration and Consultation with Tribes.....	1-10
<b>2. COMMENT SUMMARY .....</b>	<b>2-1</b>
2.1 Method of Comment Collection and Analysis.....	2-1
2.2 Summary of Public Comments Received .....	2-2
2.2.1 Written Submissions by Affiliation .....	2-2
2.2.2 Written Submissions by Geographical Area.....	2-3
2.2.3 Number of Comments by Planning Issue Category .....	2-5
<b>3. ISSUE SUMMARY .....</b>	<b>3-1</b>
3.1 Chronology of Planning Issue Development .....	3-1
3.2 Planning Issue Statements .....	3-3
3.3 Summary of Public Comments by Planning Issue Category .....	3-5
3.3.1 Travel Management .....	3-5
3.3.2 Energy Development .....	3-6
3.3.3 Recreation Management .....	3-7
3.3.4 Lands and Realty / Community Growth and Expansion.....	3-8
3.3.5 Fish and Wildlife.....	3-8
3.3.6 Special Designation Areas .....	3-9
3.3.7 Wilderness Study Areas and Lands with Wilderness Characteristics .....	3-10

3.3.8	Water, Soil, and Riparian Areas .....	3-10
3.3.9	Special Status Species Management .....	3-10
3.3.10	Vegetation Management.....	3-11
3.3.11	Air Quality .....	3-11
3.3.12	Livestock Grazing.....	3-11
3.3.13	Cultural, Heritage, and Paleontological Resources and Native American Religious Concerns.....	3-12
3.3.14	Social and Economic Considerations.....	3-12
3.3.15	Public Health and Safety.....	3-12
3.3.16	Noise.....	3-12
3.3.17	Drought Management / Climate Change.....	3-13
3.3.18	Other Issues To Be Addressed in the RMP.....	3-13
3.4	Issues That Will Not Be Addressed in the RMP.....	3-14
3.5	Anticipated Decisions.....	3-15
3.5.1	Future Land Use Plan-Level Decisions.....	3-16
3.5.2	Future Implementation Decisions .....	3-16
3.6	Valid Existing Management.....	3-17
3.7	Special Designations, Including Nominations.....	3-17
<b>4.</b>	<b>PLANNING CRITERIA .....</b>	<b>4-1</b>
4.1	Preliminary Planning Criteria.....	4-1
4.2	Additional Suggestions for Planning Criteria .....	4-4
<b>5.</b>	<b>DATA SUMMARY/DATA GAPS .....</b>	<b>5-1</b>
<b>6.</b>	<b>FUTURE STEPS.....</b>	<b>6-1</b>
6.1	Summary of Future Steps and Public Participation Opportunities .....	6-1
6.2	Contact Information.....	6-3

---

## FIGURES

Figure	Page	
Figure 1-1	Project Planning Area .....	1-5
Figure 2-1	Proportion of Written Submissions per Affiliation .....	2-3
Figure 2-2	Proportion of Written Submissions by Geographic Area .....	2-4
Figure 2-3	Number of Individual Comments per Planning Issue Category .....	2-7



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## TABLES

Table		Page
Table 1-1	Scoping Open House Information.....	1-6
Table 1-2	Cooperating Agency Participation .....	1-8
Table 1-3	Cooperating Agency Meetings .....	1-9
Table 2-1	Number of Written Submissions per Affiliation .....	2-3
Table 2-2	Number of Written Submissions by Geographic Area.....	2-4
Table 2-3	Comments by Issue or Other Category.....	2-5
Table 2-4	Number of Individual Comments per Planning Issue Category .....	2-6
Table 3-1	Planning Issue Categories and Statements.....	3-3
Table 3-2	Issues Outside of Planning Issues To Be Addressed in RMP.....	3-13
Table 3-3	Issues That Will Not Be Addressed in the RMP.....	3-14

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## APPENDICES

### Appendix

- A Notice of Intent
- B BLM Comment Form
- C Newsletter
- D List of Commentors
- E Representative Scoping Comments by Planning Issue

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## ACRONYMS

Acronym	Definition
ACEC	Area of Critical Environmental Concern
ATV	all-terrain vehicle
BLM	United States Department of the Interior, Bureau of Land Management
BMP	Best Management Practices
CDOW	Colorado Division of Wildlife
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CNAP	Colorado Natural Areas Program
CNHP	Colorado Natural Heritage Program
COA	Conditions of Approval
DOI	Department of the Interior
EIS	environmental impact statement
EPA	Environmental Protection Agency
FLPMA	Federal Land Policy and Management Act of 1976
GIS	Geographical Information Systems
GJFO	Grand Junction Field Office
MOU	Memoranda of Understanding
NEPA	National Environmental Policy Act of 1969
NOI	Notice of Intent
OHV	off-highway vehicle
RAC	Resource Advisory Council
RMP	Resource Management Plan
SRMA	Special Recreation Management Area
USDA	US Department of Agriculture
WSA	Wilderness Study Area
WSR	Wild and Scenic River

# SECTION I

## INTRODUCTION

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The United States Department of the Interior (DOI), Bureau of Land Management (BLM) is preparing a Resource Management Plan (RMP) for public lands administered by the Grand Junction Field Office (GJFO) in western Colorado. The RMP will allow for public land management that can evolve to reflect the changing needs of the planning area over the coming decades. The RMP will replace the current plan that was developed in 1987 and subsequent amendments to that plan.

Under the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) and the Council on Environmental Quality's (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1501), federal agencies are required to consider the environmental effects of their actions prior to taking such actions. Actions that are subject to NEPA include projects and programs that are entirely or partially financed, assisted, conducted, regulated, or approved by federal agencies; new and revised agency rules, regulations, plans, policies, or procedures; and legislative procedures (40 CFR 1508.18). The actions proposed by the BLM as part of the GJFO RMP are subject to the requirements of NEPA. Pursuant to NEPA, the BLM will prepare an environmental impact statement (EIS) jointly with the GJFO RMP.

### **I.1 OVERVIEW OF PUBLIC INVOLVEMENT REQUIREMENTS**

Public involvement is a vital and legal component of both the RMP and EIS processes. Public involvement vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR Section 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in the NEPA process. Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on public lands. Guidance for implementing public involvement during land use planning actions on public lands

can be found in the BLM's Land Use Planning Handbook (H-1601-1). Public involvement requirements of both NEPA and FLPMA will be satisfied through this joint RMP/EIS process.

## **I.2 OVERVIEW OF THE RMP/EIS PUBLIC INVOLVEMENT PROCESS**

Public involvement for the GJFO RMP/EIS is being conducted in the following four phases:

- Public scoping before NEPA analysis begins to determine the scope of issues and alternatives to be addressed in the RMP/EIS;
- Public outreach via newsletters and news releases;
- Collaboration with federal, state, local, and tribal governments, the BLM Colorado Northwest Resource Advisory Council (RAC), and cooperating agencies; and
- Public review of and comment on the Draft RMP/EIS, which analyzes likely environmental effects and identifies the BLM's preferred alternative.

This scoping summary report documents the results of the first three phases of the public involvement process, beginning with public scoping.

Scoping is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. Information collected during scoping may also be used to develop the alternatives to be addressed in a NEPA document. The process has two components: internal scoping and external scoping. Internal scoping is conducted within an agency or cooperating agencies to determine preliminary and anticipated issues and concerns. An interdisciplinary team of BLM GJFO resource specialists held internal scoping meetings to identify the anticipated planning issues and the methods, procedures, and data to be used in compiling the RMP/EIS.

External scoping is a public process designed to reach beyond the BLM and attempts to identify the concerns of high importance to the public. External scoping helps ensure that real problems are identified early and that they are properly studied, that issues of no concern do not consume time and effort, and that the proposed action and alternatives are balanced, thorough, and able to be implemented.

In accordance with 43 CFR 1610.2(d), the BLM must document the scoping results. The BLM's land use planning guidance (Handbook H-1601-1) requires the preparation of a Scoping Summary Report to capture public input in one document. This report must summarize the separate comments received during the formal external scoping period. It also must describe the issues and

management concerns from public scoping meetings, internal scoping meetings, and the pre-plan analysis and must include a discussion of how these comments will be incorporated into the RMP.

### **I.3 PURPOSE OF AND NEED FOR THE RESOURCE MANAGEMENT PLAN**

An RMP is a land use plan that describes broad multiple-use direction for managing public lands administered by the BLM. FLPMA directs the BLM to develop such land use plans to provide for appropriate uses of public land. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. These decisions establish goals and objectives (desired outcomes) for resource management and the measures needed to achieve them. These measures are expressed as actions and allowable uses (i.e., lands that are open or available for certain uses, including any applicable restrictions, and lands that are closed to certain uses).

The BLM-administered public lands within the GJFO planning area are currently managed in accordance with the decisions in the 1987 Grand Junction RMP. The BLM has completed approximately 50 maintenance actions and 12 plan amendments since the 1987 Record of Decision was signed. Although the 1987 RMP has been subsequently amended, it does not satisfactorily address new and emerging issues. Laws, regulations, policies, and issues regarding management of these public lands have changed during the life of the plan. The BLM is developing a new RMP to ensure compliance with current mandates and to address current issues. The RMP will establish new land use planning decisions to address issues identified through public scoping and, where appropriate, may incorporate decisions from the 1987 Grand Junction RMP, as amended.

To support the RMP preparation, the BLM will prepare an EIS that provides a comprehensive evaluation of the environmental issues and impacts. The NEPA requires the BLM to consider a range of alternatives in its planning process and to analyze and disclose the potential environmental impacts of proposed RMP decisions. The alternatives and the impact analysis are documented in the EIS. The EIS process also provides opportunities for participation by the public, other federal agencies, state and local governments, and tribal governments in RMP development. The RMP and EIS will be combined into one document.

### **I.4 DESCRIPTION OF THE RMP PLANNING AREA**

The planning area encompasses BLM, US Department of Agriculture (USDA) Forest Service, US DOI National Park Service, and State of Colorado lands and private property in Mesa, Garfield, Montrose, and Delta Counties. Management direction outlined in the RMP will apply only to the 1.20 million acres of public land (surface) and 1.45 million acres of federal mineral estate (subsurface) administered by the BLM within these counties. No management direction will be developed for lands under other ownership. In addition, the RMP will not provide management direction for the McInnis Canyon National Conservation Area, as this area is managed under the 2004 Colorado Canyons National

Conservation Area RMP. A map of the planning area is provided in **Figure I-1**, Project Planning Area.

## **I.5 DESCRIPTION OF THE SCOPING PROCESS**

The BLM follows the public involvement requirements documented in CEQ regulations implementing NEPA (40 CFR 1501.7 for scoping and 1506.6 for public involvement). The BLM also follows public involvement requirements described in the BLM's planning regulations (43 CFR 1601-1610). The BLM solicits comments from relevant agencies and the public, organizes and analyzes all comments received, and then distills them to identify issues that will be addressed during the planning process. These issues define the scope of analysis for the RMP and are used to develop the project alternatives.

### **I.5.1 Notice of Intent**

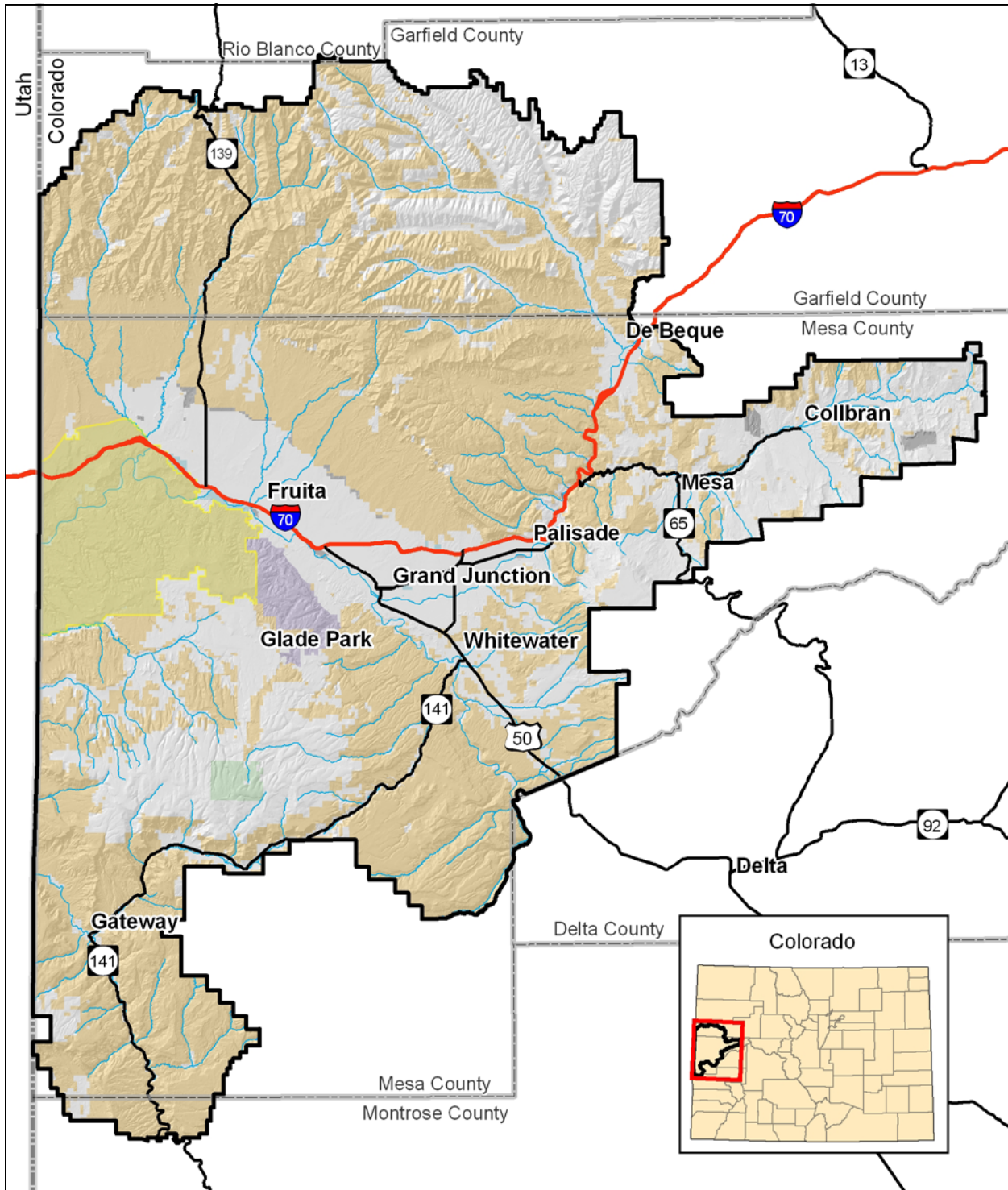
The formal public scoping process for the GJFO RMP/EIS began on October 15, 2008, with the publication of the Notice of Intent (NOI) in the *Federal Register* (Vol. 73, No. 200, page 61164). A copy of the NOI is included in **Appendix A**. The NOI notified the public of the BLM's intent to develop an RMP for the GJFO; it also initiated the public comment period, which closed on January 9, 2009. Although the formal comment period has ended, the BLM will continue to consider all comments received during the planning process. The NOI was posted on the project Web site (<http://www.blm.gov/co/st/en/fo/gjfo/rmp.html>).

### **I.5.2 Project Web Site**

A public Web site was launched to provide the public with the latest information about the RMP/EIS process. The Web site, available on the Internet at <http://www.blm.gov/co/st/en/fo/gjfo/rmp.html>, provides background information about the project, a public involvement timeline and calendar, maps and photos of the planning area, and copies of public information documents such as the NOI and newsletter. The site also provided a link to the comment form (**Appendix B**) for submitting comments about the RMP process.

### **I.5.3 Newsletter**

On November 11, 2008, the BLM mailed a newsletter announcing the start of the scoping period for the GJFO RMP/EIS to more than 680 individuals from the public, agencies, and organizations who had participated in past GJFO BLM activities and had been included on past BLM distribution lists. A copy of the newsletter is provided in **Appendix C**. The newsletter provided the dates and venues for three scoping open houses, included a comment form for submitting scoping comments, and described the various methods for submitting comments, including dedicated email and postal addresses. The BLM will publish future newsletters at major project milestones and will mail them to individuals and organizations that have requested to remain on or be added to the project mailing list. These newsletters also will be posted on the project Web site. Participants may request to receive newsletters and other project information through electronic or postal mail.



**LEGEND:**

- Planning Area
- State Boundary
- County Boundary
- Interstate Highway
- Highway
- Bureau of Land Management
- US Forest Service
- National Park Service
- State of Colorado
- Private
- McInnis Canyons NCA

*Project Planning Area*



**Figure I-1**

#### I.5.4 News Release

A news release was provided to local news organizations on November 6, 2008. This press release announced the scoping period for the GJFO RMP/EIS process and provided information on the open houses.

#### I.5.5 Scoping Open Houses

The BLM hosted three open houses to provide the public with opportunities to become involved, to learn about the project and the planning process, to meet the GJFO RMP team members, and to offer comments. The public was notified of the open houses by news release and in the project newsletter. Information on the open houses is provided in **Table I-1**.

**Table I-1**  
**Scoping Open House Information**

Venue	Location	Date	Number of Attendees
Two Rivers Convention Center	Grand Junction, Colorado	December 2, 2008	99
Grand Center	Moab, Utah	December 3, 2008	2
Collbran Auditorium	Collbran, Colorado	December 4, 2008	13
<b>Total Attendees</b>			<b>114</b>

Note: All meetings were from 5:30 to 7:00 PM.

Scoping meetings were held in an open house format to encourage participants to discuss concerns and questions with BLM staff representatives. The BLM gave a short presentation to provide an overview of the RMP process and present information about public involvement opportunities. Site and resource maps illustrated the current situation and management techniques practiced among different resources and land areas. In addition, summaries of resource issues were available to provide an overview of current management practices and issues. Copies of the project newsletter and scoping comment forms were also available. As shown in **Table I-1**, 114 people attended the open houses.

#### I.5.6 Mailing List

The BLM compiled a mailing list of over 680 individuals, agencies, and organizations that have participated in past BLM projects. Each entity was mailed or emailed the initial newsletter with project and open house information. Attendees at the scoping open houses were added to the mailing list if they wanted to receive or continue to receive project information. In addition, all individuals or organizations who submitted scoping comments were added to the mailing list. Through this process, the mailing list was revised to include approximately 870 entries. Requests to be added to or to remain on the official GJFO RMP distribution list will continue to be accepted throughout the planning process.



## I.6 COLLABORATIVE INVOLVEMENT PROCESS

In addition to formal scoping, the BLM has implemented an extensive collaborative outreach and public involvement process that has included conducting a community assessment, coordinating with cooperating agencies, and working closely with the RAC and a specially created subgroup of the RAC. These efforts are summarized below. The BLM will continue to meet with interested agencies and organizations throughout the planning process, as appropriate, and will coordinate closely with cooperating partners.

### I.6.1 Community Assessment

The community assessment process has been initiated, and the selection of focus groups throughout the planning area is underway. Mesa State College, in cooperation with the GJFO, is facilitating small group discussions with representatives of local governments in the planning area to discuss their visions for their communities and for the public lands that surround their communities. The community assessment process begins a collaborative planning effort that can continue throughout the RMP process. Meetings will continue through the latter half of April 2009. Information obtained during the community assessment will be summarized in a report that will be available for public viewing. This information will be used in developing alternatives for the RMP/EIS.

### I.6.2 Cooperating Agency Collaboration

A cooperating agency is any federal, state, or local government agency or Indian tribe that enters into a formal agreement with the lead federal agency to help develop an environmental analysis. More specifically, cooperating agencies “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks” (BLM Land Use Planning Handbook H-1601-1). The benefits of enhanced collaboration among agencies in preparing NEPA analyses are:

- Disclosing relevant information early in the analytical process;
- Applying available technical expertise and staff support;
- Avoiding duplication with other federal, state, tribal, and local procedures; and
- Establishing a mechanism for addressing intergovernmental issues.

On April 8, 2008, the BLM wrote to local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies for the GJFO RMP. As of March 2009, ten agencies have agreed to participate in the RMP as designated cooperating agencies, and eight have signed Memoranda of Understanding (MOU) with the GJFO (**Table I-2**). No formal MOU has been established with cooperating agencies within DOI, including Bureau of Reclamation and Fish and Wildlife Service.

**Table I-2  
Cooperating Agency Participation**

<b>Agencies and Tribes Invited to be Cooperators</b>	<b>Agencies that Accepted as of March 2009</b>
City of Delta	
City of Fruita	X
City of Grand Junction	X
Town of De Beque	X
Town of Collbran	X
Town of Palisade	X
Delta County	
Garfield County	
Mesa County	X
Montrose County	
Colorado Department of Natural Resources	X
DOI Bureau of Reclamation	X
DOI Fish and Wildlife Service	X
USDA Forest Service	X
USDA National Resource Conservation Service	
Northern Ute Indian Tribe	
Southern Ute Indian Tribe	
Ute Mountain Ute Indian Tribe	

As of February 2009, the BLM has conducted five meetings with cooperating agencies at the GJFO; a sixth meeting is scheduled for May 28, 2009. Information on these meetings is presented in **Table I-3**. Cooperating agencies were also encouraged to attend the scoping meetings and provide comments during the scoping period. These agencies will be engaged throughout the planning process, including during alternatives development. Future cooperating agency meeting dates will be posted on the GJFO's Resource Management project Web site (<http://www.blm.gov/co/st/en/fo/gjfo/rmp.html>).

### **I.6.3 Resource Advisory Council**

A RAC is a committee established by the Secretary of the Interior to provide advice or recommendations to BLM management (BLM Land Use Planning Handbook H-1601-1). A RAC is generally composed of 15 members of the public, representing different areas of expertise. The Colorado Northwest RAC includes members appointed to represent constituent public land users and provides input on public management issues to the BLM's Northwest RAC Designated Federal Officers and Western Slope Center Manager. Recommendations are based on consensus-building and collaboration.

**Table I-3  
Cooperating Agency Meetings**

<b>Date of Meeting</b>	<b>Attendees</b>
August 19, 2008	Colorado Division of Wildlife City of Fruita City of Grand Junction Town of De Beque Town of Palisade US Fish and Wildlife Service US Forest Service
November 11, 2008	Colorado Division of Wildlife City of Fruita City of Grand Junction Mesa County Town of Collbran Town of Palisade US Fish and Wildlife Service US Forest Service
December 18, 2008	Colorado Division of Wildlife City of Grand Junction Mesa County Town of Collbran US Fish and Wildlife Service US Forest Service
January 22, 2009	Colorado Division of Wildlife City of Grand Junction Mesa County Town of Collbran Town of Palisade US Fish and Wildlife Service
February 26, 2009	Colorado Division of Wildlife City of Fruita City of Grand Junction Mesa County Town of Collbran Town of Palisade US Fish and Wildlife Service US Forest Service

The Colorado Northwest RAC has been involved in the preliminary planning issues for the GJFO RMP. In addition, a RAC subgroup has been established to participate in the planning process, and in particular to assist the BLM with

creating a range of reasonable alternatives for the EIS. To date, four meetings of the RAC subgroup have been held at the GJFO; these meetings occurred on December 11, 2008, December 18, 2008, January 22, 2009, and February 26, 2009. It is anticipated that meetings will continue throughout the development of alternatives and the draft RMP. Future meeting dates will be posted on the GJFO's Resource Management project Web site (<http://www.blm.gov/co/st/en/fo/gjfo/rmp.html>).

#### **I.7 COLLABORATION AND CONSULTATION WITH TRIBES**

The BLM began tribal consultation for the RMP through a Ute Ethnohistory Project. Presentations were held for Tribal Councils in February, May, and August 2007, and letters of invitation were mailed to Tribal Cultural Department staff in September 2007. Representatives from the Northern Ute Tribe, Southern Ute Tribe, and Ute Mountain Ute Tribe attended one meeting in Gateway in November 2007 and in Grand Junction in March 2008. BLM held a meeting during the Ethnohistory tour with the Ute Tribes on September 11, 2008 and briefed tribal representatives on the RMP process and their involvement. This was followed by a field site tour on September 9 through 11, 2008 with cultural staff and traditional leaders from the Ute Indian Tribe and the Ute Mountain Ute Tribe. The BLM will conduct additional meetings with Tribal Councils this spring to include a presentation of travel management information.

No written comments were received from tribal agencies during the scoping period; tribal concerns or issues have been typically presented in oral format. Government-to-government consultation will continue throughout the RMP process to ensure that the concerns of tribal groups are considered in development of the RMP.

# SECTION 2

## COMMENT SUMMARY

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### 2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions postmarked or received on or before January 9, 2009, were evaluated and are documented in this Scoping Summary Report. Supplementary letters from two government agencies were accepted after the comment period and included in this report. Other submissions received after this date have not been incorporated into the comment summary analysis presented; however, these and any other comments received during the RMP process will be considered in alternative formulation and project planning.

A total of 149 written submissions were received during the public scoping period. The most common format used for submissions was electronic mail. Submissions were also delivered in person at the public scoping meetings or mailed via US Mail. In addition, some submissions were hand-delivered to the GJFO. Written submissions were received using the following means:

- 55.7 percent via electronic mail;
- 36.2 percent via letter or comment form sent by US Mail;
- 4.0 percent via letter or comment form hand-delivered to the GJFO;
- 3.4 percent via facsimile; and
- 0.7 percent via the BLM comment form at a public scoping meeting.

A list of commentors and the dates of submittal are provided in **Appendix D**. Most written submissions included more than one comment, so the 149 submissions yielded 953 discrete comments. The comment forms provided instructions for requesting confidentiality and for withholding individual names or addresses from public review or from disclosure under the Freedom of Information Act. Two commentors requested confidentiality.

To ensure that public comments were properly registered and that none were overlooked, a multi-phase management and tracking system was used. First, written submissions were logged and numbered. Once all comments were received and documented, the BLM assigned a planning classification to each issue. These classifications detail which issues raised will be resolved through the current planning effort. Planning classifications are as follows:

- A – Issues that will be resolved in the RMP
- B – Issues that will be addressed through BLM policy or administrative action (National and BLM policy)
- C – Issues that have already been addressed by the GJFO or that will be addressed independent of the RMP
- D – Issues that are beyond the scope of this RMP that will be considered but not addressed

To assist with the analysis, the BLM entered comment codes into a database and organized comment codes by planning issue categories and affiliation of the commentor. Finally, these identifiers were queried and tallied to provide information on planning and other issue categories.

## 2.2 SUMMARY OF PUBLIC COMMENTS RECEIVED

### 2.2.1 Written Submissions by Affiliation

**Table 2-1** and **Figure 2-1** show the number and proportion of written submissions received from each type of affiliation. Letters on business, agency, or organization letterhead or where the commentor signed using their official agency title were considered to represent that organization. All other letters were considered to represent individuals. Members of the general public provided 63.8 percent of the comments received during the scoping period, representatives from the commercial sector submitted 14.1 percent, and non-profit or citizen groups submitted 13.4 percent. Federal agencies submitted 3 written submissions (2.0 percent), state agencies submitted 2 written submissions (1.3 percent), and local governmental agencies submitted 8 written submissions (5.4 percent), for a total of 8.7 percent of the submissions from government. No written submissions were received from tribal governments or organizations or elected officials. A list of commentors, their affiliations, and the submittal date of their comments are listed in **Appendix D**.

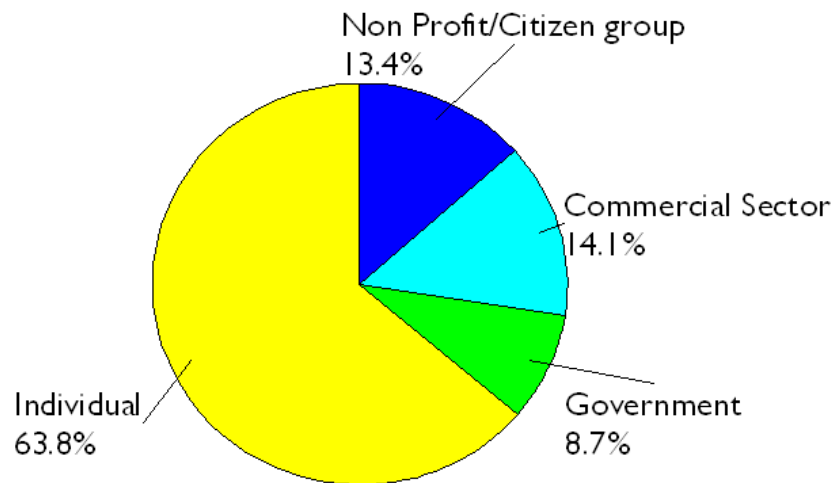
In addition to individual submissions, letter campaigns from two non-profit organizations resulted in electronic form letter submissions. A third from letter was submitted by members of a recreational group. A representative example of each form letter was considered for comment analysis. Letters that represented slight variations of the form letter without significant additional information were treated as form letters. In total, 13,691 electronic submissions were

received from the Wilderness Society's letter campaign, 48 were received from the Colorado Environmental Coalition's letter campaign, and 4 copies were received of the off-highway vehicle (OHV) community form letter. These form letters are not included in the calculations of affiliation and geographic location percentages.

**Table 2-1  
Number of Written Submissions per Affiliation**

<b>Affiliation</b>	<b>Number of Written Submissions</b>
Individual	95
Commercial Sector	21
Non-Profit/Citizen Group	20
Federal Agency	3
State Agency	2
City/County Government	8
<b>Total</b>	<b>149</b>

**Figure 2-2 Proportion of Written Submissions per Affiliation**



### 2.2.2 Written Submissions by Geographical Area

**Table 2-2** and **Figure 2-2** show the number and proportion of written submissions received by the geographic location of the sender. A total of 96 submissions (approximately 64.5 percent) were from counties within the planning area; 88 (91.7 percent) of these submissions originated from Mesa County, the county which covers the majority planning area. Of the remaining submissions, 20 (13.4 percent) were from commentators in other counties in Colorado, primarily from the Front Range. Two submissions (1.3 percent)

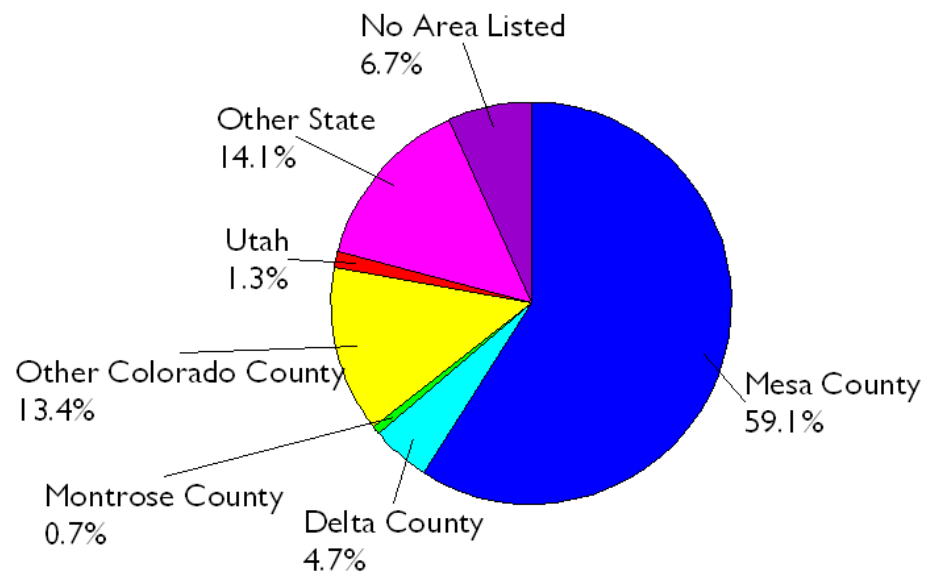
originated from commentors in Utah, which borders the planning area, and 21 submissions (14.1 percent) came from other states. Ten of the 149 written submissions received did not indicate a geographic origin (6.7 percent).

**Table 2-2  
Number of Written Submissions by Geographic Area\***

<b>Geographic Area</b>	<b>Number of Written Submissions</b>
<b>Counties with Lands in the Planning Area</b>	
Mesa County	88
Delta County	7
Montrose County	1
<b>Total Submissions in the Planning Area</b>	<b>96</b>
<b>Areas Outside the Planning Area</b>	
Other Colorado County	20
Utah	2
Other State	21
<b>Total Submissions Outside the Planning Area</b>	<b>43</b>

\* Ten submissions did not list a geographic origin, as a result the total in Table 2-2 does not equal total submissions.

**Figure 2-2 Proportion of Written Submissions by Geographic Area**





### 2.2.3 Number of Comments by Planning Issue Category

**Table 2-3** shows the number of issues raised that will or will not be addressed in the RMP. Of the 953 comments received, 695 comments (72.9 percent) were related to a planning issue that will be addressed in the RMP. While some comments addressed multiple planning issues, one primary category was selected for analysis. These comments are discussed in detail below and in **Section 3**, Issue Summary. In addition, 133 comments (13.9 percent) were related to issues that will be addressed in the RMP but do not fall within a specific planning issue category. These comments included general comments on the RMP planning process, alternatives development, collaboration, and requirements of NEPA and other regulations (see Section 3.3.18, Other Issues to Be Addressed in the RMP). The remaining 13.2 percent of the comments were: 1) issues that fall within BLM national policy or administrative action (3.5 percent); 2) issues that are being addressed or will be addressed by the GJFO outside of the RMP planning process (6.3 percent); or 3) issues that are outside the scope of this RMP (3.4 percent). See **Section 3.4**, Issues That Will Not Be Addressed in the RMP, for more detail.

Comments and planning issues are detailed in **Appendix E**, Representative Comments by Comment Issue. The BLM recognizes that this report does not include all individual comments; rather, the focus of this report is to provide an overview of the overarching themes presented in the comments. Interested parties can view scoping comment submissions in their entirety at the GJFO.

**Table 2-3**  
**Comments by Issue or Other Category**

<b>Issue or Other Category</b>	<b>Total</b>	<b>Percent of Total</b>
<b>Issues that will be addressed in the RMP</b>		
Planning issues to be addressed in the RMP	695	72.9
General RMP issues	133	13.9
<b>Total Comments Addressed</b>	<b>828</b>	<b>86.8</b>
<b>Issues that will not be addressed in the RMP</b>		
BLM administrative or policy issue	33	3.5
Issues to be addressed or to be addressed by the GJFO outside the RMP	60	6.3
Issues outside the scope of the RMP	32	3.4
<b>Total Comments not Addressed</b>	<b>125</b>	<b>13.2</b>

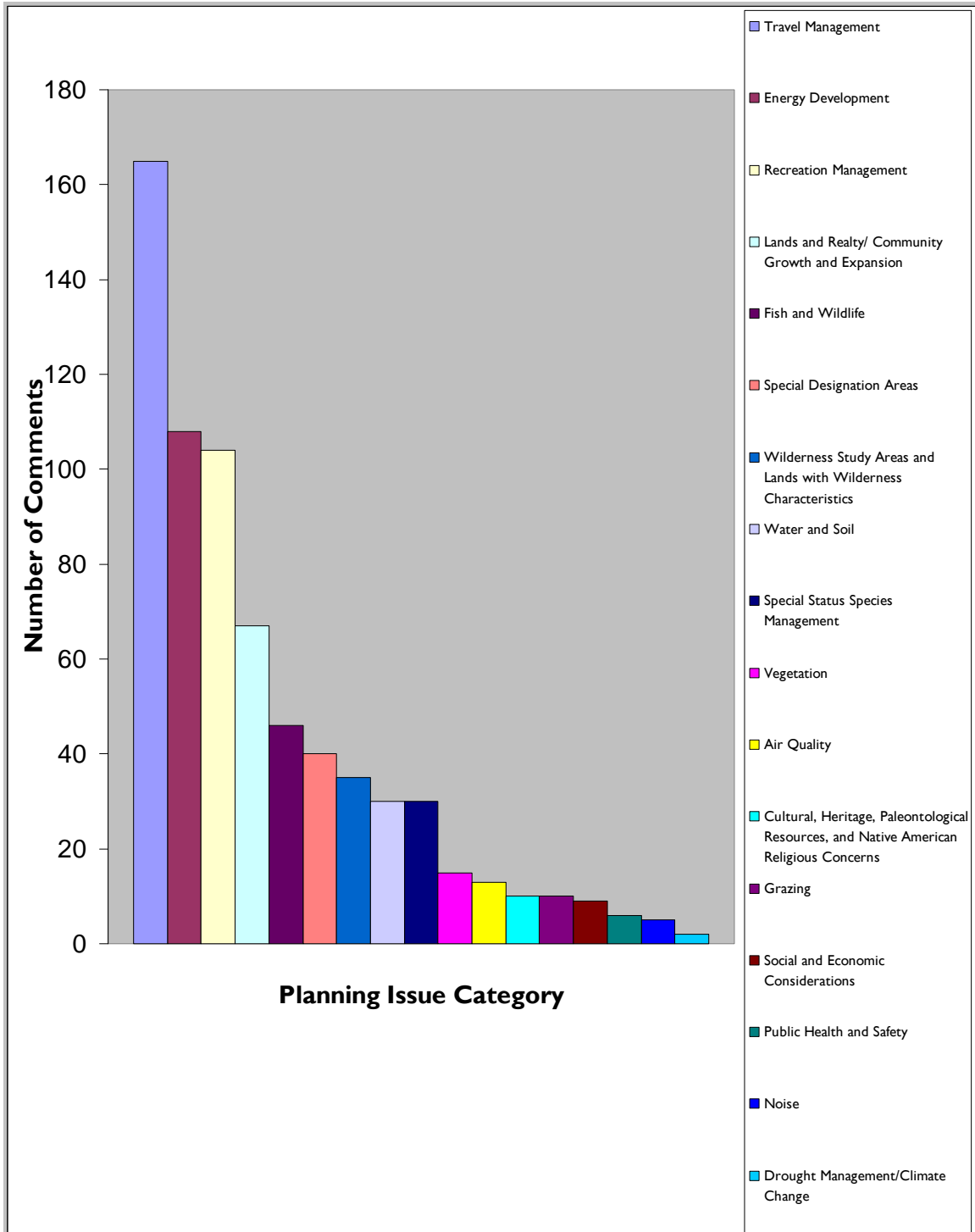
**Table 2-4** and **Figure 2-3** show the number and proportion of comments received by planning issue category. The BLM received 695 planning issue comments and categorized them into 17 planning issue categories. Section 3,

Issue Summary, provides a detailed analysis of the comments received for each planning issue category. Most of the planning issue comments focused on travel management (23.7 percent), energy development (15.6 percent), recreation (15.0 percent), lands and realty and community expansion (9.6 percent), and Fish and wildlife (6.6 percent). Special designations (5.8 percent); WSAs and lands with wilderness characteristics (5.0 percent); water, soil, and riparian areas (4.3 percent); and special status species (4.3 percent) topics also received relatively large numbers of comments. Vegetation management, air quality, grazing, and cultural, paleontological, and Native American issues and socioeconomics categories all received less than 3 percent of the comments. The planning issue categories of public health and safety, noise, and drought management/climate change all received less than 1 percent each of the total planning issue comments.

**Table 2-4**  
**Number of Individual Comments per Planning Issue Category**

<b>Planning Issue Category</b>	<b>Number of Individual Comments</b>	<b>Percent of Total</b>
Travel Management	165	23.7
Energy Development	108	15.6
Recreation Management	104	15.0
Lands and Realty/Community Growth and Expansion	67	9.6
Fish and Wildlife	46	6.6
Special Designation Areas	40	5.8
Wilderness Study Areas and Lands with Wilderness Characteristics	35	5.0
Water, Soil, and Riparian Areas	30	4.3
Special Status Species Management	30	4.3
Vegetation Management	15	2.2
Air Quality	13	1.9
Livestock Grazing	10	1.4
Cultural, Heritage, and Paleontological Resources, and Native American Religious Concerns	10	1.4
Social and Economic Considerations	9	1.3
Public Health and Safety	6	0.9
Noise	5	0.7
Drought Management/Climate Change	2	0.3
<b>Total</b>	<b>695</b>	<b>100</b>

**Figure 2-3 Number of Individual Comments per Planning Issue Category**



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## SECTION 3

# ISSUE SUMMARY

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Issue identification is the first step of the nine-step BLM planning process. As defined in the BLM Land Use Planning Handbook (H-1601-1), planning issues include concerns or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include concerns, needs, and resource use, development, and protection opportunities to consider in RMP preparation. These issues may stem from new information or changed circumstances and from the need to reassess the appropriate mix of allowable uses.

### 3.1 CHRONOLOGY OF PLANNING ISSUE DEVELOPMENT

The BLM enacted a multi-step issue identification process for the GJFO RMP planning effort. The process began with the creation of a Preparation Plan for the GJFO RMP/EIS in January 2008. This plan, used by the interdisciplinary team to begin the planning process, summarized the purpose and need for the RMP. It also highlighted anticipated planning issues, management concerns, and preliminary planning criteria developed by the BLM interdisciplinary team during internal scoping. Based on the lands and resources managed in the planning area, these preliminary issues fell into the 20 following preliminary issue categories:

1. Energy Development
2. Vegetation Management
3. Invasive/Noxious Weeds
4. Forestry and Woodlands
5. Drought Management / Climate Change
6. Recreation
7. Wilderness
8. Special Designation Areas
9. Travel Management
10. Lands and Realty / Community Growth and Expansion

11. Special Status Species Management
12. Wildland Fire Management
13. Fish and Wildlife
14. Cultural Resources, Heritage Resources, Native American Religious Concerns, and Paleontological Resources Management
15. Air Quality
16. Soil and Water
17. Wild Horses
18. Wildland-Urban Interface
19. Public Safety
20. Social and Economic Considerations

These preliminary issue categories were expected to encompass most public issues and concerns and to serve as a starting point to spark public consideration; they were not meant to be all inclusive.

In October 2008, the BLM issued the NOI to prepare the RMP, which initiated the scoping period, and solicited written comments from the public (further discussed in Section 1.5, Description of the Scoping Process). Scoping is a collaborative public involvement process implemented to identify and refine planning issues to address in the planning process. During the scoping period, the BLM also engaged tribes and cooperating agencies, as discussed in Sections 1.6, Collaborative Involvement Process, and 1.7, Collaboration and Consultation with Tribes. The BLM hosted three open houses and solicited written comments from the public during the scoping period. The scoping period provided the BLM additional information on the public's concerns and suggestions regarding the planning area.

Based on the public input received during the scoping period, a number of new issues were identified and other categories were consolidated. The planning issue categories initially identified were reduced from 20 to 17 based on the following changes:

- Due to the limited number of comments received, the planning issues of Forestry and Woodlands, Wildland Fire Management, and Invasive/Noxious Weeds were combined into one Vegetation Management issue category;
- Wild horse management comments were added to the Fish and Wildlife issue category;
- Due to the limited number of comments and overlap of issues, Wildland-Urban Interface comments were included in the Lands and Realty / Community Growth and Expansion issue category; and

- Due to additional concerns raised, Livestock Grazing and Noise were added as planning issues.

Information accepted during the internal and external scoping was compiled to develop discrete planning issue statements; these are discussed in Section 3.2, Planning Issue Statements. The purpose of these planning issue statements is to highlight the key issues distilled from these initial planning and scoping processes. The issues are also discussed in Section 3.3, Public Comments by Planning Issue Category, according to the various issue categories and associated comments received from interested individuals, agencies, elected officials, businesses, and organizations.

### 3.2 PLANNING ISSUE STATEMENTS

The BLM Preparation Plan highlights preliminary planning issues anticipated by the BLM interdisciplinary team. All comments received throughout the scoping period were compiled and distilled to identify prominent issue statements. These issue statements, along with subsequently identified issues, will be used by the BLM and cooperators to help formulate a reasonable range of alternative management strategies that will be analyzed during the planning process. The planning issue statements are shown in **Table 3-1**.

**Table 3-1**  
**Planning Issue Categories and Statements**

Issue	Planning Issue Category	Planning Issue Statement
1.	Travel Management	How will motorized, nonmotorized, and mechanized travel be managed to provide commodity, amenity, and recreation opportunities, reduce user conflicts, enforce route designations and closures, reduce fragmentation and habitat degradation, and protect natural and cultural resources?
2.	Energy Development	Which areas should be open to oil and gas leasing, coal mining, and uranium development, and what restrictions should be employed to protect natural and cultural resources and minimize user conflicts?
3.	Recreation Management	How will recreation be managed to provide for a variety of recreational activities, while protecting natural and cultural resources, minimizing user conflicts, and providing socioeconomic benefits to local communities?
4.	Lands and Realty / Community Growth and Expansion	What opportunities exist to make adjustments to public land ownership that would increase the benefit to the public, local communities, and natural resources, while working towards BLM management goals?

**Table 3-1 (cont'd)**  
**Planning Issue Categories and Statements**

<b>Issue</b>	<b>Planning Issue Category</b>	<b>Planning Issue Statement</b>
5.	Fish and Wildlife	How will land uses be managed to maintain and improve terrestrial and aquatic habitats?
6.	Special Designation Areas	Where and what types of special designations should be enacted to protect and enhance unique resources and educational and research opportunities, and how can the BLM manage them to maximize recreational opportunities and socioeconomic benefits?
7.	Wilderness Study Areas (WSAs) and Lands With Wilderness Characteristics	How can the BLM protect and manage WSAs and areas with wilderness characteristics?
8.	Water, Soil, and Riparian Areas	What measures will be implemented to protect water resources and source water protection areas from the effects of other uses while rehabilitating areas with soils degradation?
9.	Special Status Species Management	What actions or restrictions should be undertaken to protect special status species and critical habitat in the GJFO?
10.	Vegetation Management	What measures should be implemented to protect native vegetation, riparian areas, and prevent the spread of noxious weeds, and control wildland fires?
11.	Air Quality	What measures and monitoring should the BLM implement to maintain air quality standards?
12.	Livestock Grazing	How will the BLM manage livestock grazing on public lands, while protecting, managing, and restoring the land?
13.	Cultural, Heritage, and Paleontological Resources and Native American Religious Concerns	How can the BLM protect and conserve cultural and paleontological resources, while allowing for other land and resource uses and where should BLM manage heritage resources and areas?
14.	Social and Economic Considerations	How can the BLM promote or maintain activities that provide social and economic benefits to local communities?
15.	Public Health and Safety	What measures should be undertaken to promote a healthy environment for local communities?
16.	Noise	What measures should the BLM implement to preserve the natural soundscape in the planning area?
17.	Drought Management / Climate Change	How will the BLM incorporate the analysis of the impacts of a changing climate on natural resources in the planning area?



The BLM will use the planning issues and associated statements, planning criteria, and other information collected in the early planning and scoping phases of the RMP process to help formulate a reasonable range of alternative management strategies that will be analyzed during the RMP/EIS process.

### **3.3 SUMMARY OF PUBLIC COMMENTS BY PLANNING ISSUE CATEGORY**

Each comment received during public scoping was reviewed and coded. Of the 953 comments received, 695 comments (72.9 percent) were related to one of the 17 planning issues defined above. In addition, 133 comments (13.9 percent) were related to issues that will be addressed in the RMP but do not fall within a specific planning issue category. See Section 3.3.1, Number of Comments by Planning Issue, for a breakdown of the number of comments received for each category. Summaries of the scoping comments received for each planning issue category as well as general RMP comments are provided in Sections 3.3.1 through 3.3.18 below. These summaries provide details only on comments related to issues that will be resolved in the RMP. Tables with representative comments for these issues as well as issues that will not be addressed in the RMP are included in **Appendix E**. Adjustments or additions may be made to the planning issues as the planning process proceeds and the BLM continues to review information, meet with the interdisciplinary team, and talk with the public.

#### **3.3.1 Travel Management**

The BLM received 165 comments, or 23.7 percent of the total comments received on planning issues, on travel management and transportation issues. Representative comments are included in **Appendix E, Table E-1**. Commentors included numerous individuals, two environmental organizations, and representatives of recreational user groups. One of the primary issues expressed by respondents was related to use designations on particular routes and trails, specifically which routes should be designated for motorized versus non-motorized use, and which routes should be closed versus open. Some respondents were concerned that closing trails or designating access to particular uses would limit recreational opportunities or result in congestion on remaining routes. Use of loops as well as point-to-point travel was recommended for particular areas. Others requested additional routes for particular uses such as single-track for motorcycle use and routes for all-terrain vehicle (ATV) use. Areas of particular concern included Bangs Canyon and the Tabaguache trail, Cactus Park, Hunters Canyon (21 Road) and Billings Canyon, Northwest of De Beque, North Fruita Desert, and the Gateway area. Other travel management issues included requests for increased trail maintenance on existing trails. Specific concerns about road maintenance included degradation of roads due to dispersed camping areas, hunting, and firewood gathering areas, as well as degradation from roads to access areas of oil and gas development.

Another primary issue was fragmentation and habitat degradation due to unregulated use of trails and roads, redundant routes, and user-created routes.

Concerns included the impacts on wildlife, sensitive plant and animal species, and critical cultural areas. A number of commentors addressed the role of increased damage to cultural resources as a result of increased access. The Wilderness Society urged that all user-created routes be excluded from designation until they can be further analyzed. In addition, the Colorado Environmental Coalition stated specific concerns about road density and urged the BLM to include an analysis of road and trail density in travel management analysis.

It should be noted that six additional trails and routes data-collection workshops were held between February 10 and 19, 2009. These meetings gave the public an opportunity to provide the BLM with data and missing information on existing trails and routes. Information was also collected during a public comment period for travel management from February 10 to March 20, 2009. Information obtained during the trails and routes data collection workshops and comment period is not included in this scoping report but will be used during preparation of the RMP/EIS. In addition, a second comment period to collect information specifically on trails and routes is scheduled for July 20 to August 21 2009.

### **3.3.2 Energy Development**

The BLM received 108 total comments on energy development, comprising 15.6 percent of total planning issue comments. Representative comments are shown in **Appendix E, Table E-3**. Comments about energy development on BLM lands were mixed; the majority of commentors supported such development, while some commentors opposed energy development. Most of the comments on energy development pertained to oil, gas, and coal development, although uranium and other minerals were mentioned in some comments. Comments were received from multiple affiliations, including individuals, an environmental group, energy companies, and a Colorado state agency.

Most of the support for energy development on BLM lands was expressed by energy companies. Nine letters were received from employees of the McClane mining company and its parent company, Rhino Energy LLC. These commentors urged the BLM to continue allowing coal resources to be developed in the Book Cliffs area, as previously designated in the 1987 RMP, and in particular to allow the current McClane Canyon mine and the proposed Red Cliffs mining project, which is currently undergoing a separate EIS process. These commentors cited the benefits of the mines to the local economy and to national energy independence. Letters from Gunnison Energy, JE Stover & Associates, Inc., and Questar Exploration and Production Company voiced similar concerns. In addition, these commentors stated that visual resource management classification and regulations for transportation and infrastructure should be consistent with energy development. A law firm representing several oil and gas companies commented that BLM lands within the GJFO should be used to their full extent to help meet the nation's energy needs. It urged the BLM to impose

only reasonable restrictions on oil and gas development, per Section 363 of the Energy Policy Act of 2005.

Numerous individuals also expressed their support for energy development and production in the project area. These commentors asked the BLM to continue to allow leasing and development to occur with no unreasonable restrictions. They focused on the multiple-use mandate of the BLM and the importance of local energy reserves for the nation's economy and security. Commentors also mentioned that the Reasonable Foreseeable Development Scenario to be prepared in conjunction with the GJFO RMP revision use best available data.

Opposition to and concerns about the environmental effects of energy development, particularly oil and gas leasing, was expressed by multiple individuals, an environmental group, and a Colorado state agency. Commentors were concerned about the environmental impacts on the land, and on air, water, and wildlife in particular. Commentors also expressed concerns that oil and gas development would come at the expense of other land uses such as recreation. They expressed support for multiple uses without an emphasis on oil and gas extraction. The Wilderness Society expressed concern about the effects on sage-grouse and other wildlife habitat. They ask the BLM to "rigorously explore" the possibility and design alternatives that do not leave a significant portion of the GJFO open to oil and gas leasing, and to develop a variety of non-waivable stipulations, conditions of approval (COAs), and best management practices (BMPs). They also urged the BLM to include discussion of renewable energy development and energy corridors in the energy development analysis. The Colorado Division of Wildlife (CDOW) expressed multiple concerns, including the overall effects of energy development on the landscape, noxious weeds, reclamation, and mitigation. They urged the BLM to develop an oil and gas leasing EIS concurrent with the RMP revision to evaluate these issues.

### **3.3.3 Recreation Management**

The planning issue category receiving the third largest number of comments was recreation management (104 comments, 15.0 percent of planning issue comments). See **Appendix E, Table E-2** for representative comments. Commentors included individuals, representatives of recreational user groups such as rock climbers, OHV enthusiasts, and environmental organizations. The primary concerns expressed included continued access to and availability of recreation sites and recreational opportunities. A related issue was conflicts between different types of recreational users, especially motorized and non-motorized uses. Numerous commentors expressed the importance of opportunities for quiet recreation on BLM lands and concern for resource degradation from recreational activities. Additionally, multiple non-profit groups provided suggestions for management and regulations to reduce resource damage and user conflicts. A number of commentors expressed the importance of continued opportunities for hunting, fishing, and target shooting in the GJFO.

The desire for additional dispersed camping and designated campground areas was also expressed by some individuals, as was the importance of regulating these activities.

Recreational opportunities and designations in the Gateway Canyon area were of particular interest to individuals, environmental organizations, and the Gateway Canyons Resort. Commentors provided detailed suggestions for the management of the area, including comments on the Special Recreation Management Area (SRMA) designation and the classification of each zone within the area.

#### **3.3.4 Lands and Realty / Community Growth and Expansion**

Approximately 9.6 percent of planning issue comments (67 comments) pertained to this issue category. Representative comments are included in **Appendix E, Table E-4**. Many comments referred to land tenure adjustment proposals—comments from the Puckett Land Company, Grand Junction Airport, CDOW, the cities of Collbran and Grand Junction, the Town of Palisade, the Old Spanish Trail Association, Colorado Natural Areas Program (CNAP), FWS, and one individual all nominated particular parcels for disposal, for retention under BLM ownership, or for transfer to BLM ownership. Specific reasons for disposal or retention of parcels included protecting sensitive plants and habitats and providing benefits to the local community. Multiple comments were also received from the Union Telephone Company regarding BLM lands in general. The company encouraged the BLM to maintain existing utility corridors, add additional corridors, and allow the siting of wireless communications infrastructure outside utility corridors. Some commentors expressed concern about the disposal or transfer of parcels containing important habitat or sensitive species. Additionally, the Selenium Task Force and the FWS were concerned with the transfer of parcels with high selenium and salts, and the consequences of these parcels eventually being irrigated, should their land status change.

#### **3.3.5 Fish and Wildlife**

Forty-six comments were received on this issue, which represents 6.6 percent of the total number of planning issue comments received. See **Appendix E, Table E-6** for representative comments. Individuals, environmental organizations, and CDOW expressed support for the protection of wildlife habitat. Commentors listed specific habits and populations to protect and manage. These respondents also expressed concerns about conflicts between protection for wildlife and other land uses, such as recreation and oil and gas development. One individual, however, stated that wildlife can successfully coexist with other land uses such as oil and gas development. The CDOW listed suggested habitat manipulations for specific areas to improve these habitats. The CDOW also provided multiple specific measures to be implemented during development to protect particular important habitat and

species. The Wilderness Society outlined a science-based approach for wildlife management, which it suggested that the RMP implement.

### 3.3.6 Special Designation Areas

Forty comments (5.8 percent of the total planning issue comments received) were about special designations; see **Appendix E, Table E-6** for representative comments. Special designation area comments pertained to Wild and Scenic Rivers (WSR), Areas of Critical Environmental Concern (ACEC), back-country byways, National Historic Trails, National Conservation Areas (NCAs), and Heritage Areas.

The WSR study process was mentioned by multiple commentors. Five commentors generally supported the eligibility findings in the draft eligibility report presented at the scoping meetings or would support a WSR designation for study segments, particularly those segments of the Colorado and Gunnison rivers. Some of these commentors provided additional information that was incorporated into the final eligibility report. Two commentors disagreed with the eligibility findings in the draft eligibility report presented at the scoping meetings or with an eligibility finding of any additional segments within the project area in general. Additional comments related either to general background information, management of eligible or suitable segments, or suitability.

A state government agency, environmental groups, and some individuals urged the BLM to expand areas protected under special designation status. The Colorado Natural Heritage Program (CNHP) recommended that seven potential conservation areas receive ACEC status. CNHP and one individual also called for the limitation of oil and gas and mineral leasing in ACECs. The Wilderness Society's Citizen Wilderness Proposal recommended two areas for ACEC status.

Representatives of the Old Spanish Trail Association commented on the importance of this national historic trail and recommended management direction for this area. Back-country byways were discussed by a few commentors; specifically the addition of Tabaguache Trail and the Gateway Byway were recommended. Others asked for the de-classification of State Highway 139. A few commentors stated support for additional NCAs, including Dominguez/Escalante Canyon as well as an NCA in the Gateway area in order to protect lands with unique recreational, cultural or ecological value. One commentor questioned the purpose of Heritage Areas.

In general, individuals opposed to the designation of additional special designation areas cited conflicts with uses such as energy development, rock climbing, OHV use, and the associated impacts on the local economy.

### **3.3.7 Wilderness Study Areas and Lands with Wilderness Characteristics**

Thirty-five comments were received about WSAs and lands with wilderness characteristics, representing approximately 5.0 percent of the total comments. Representative comments are included in **Appendix E, Table E-7**. Environmental organizations expressed the desire for the BLM to appropriately protect existing WSAs and lands with wilderness characteristics and to consider and evaluate additional lands for wilderness characteristics. These organizations stated that the current regulations prohibiting the addition of additional WSAs does not preclude the BLM from an obligation to protect lands. In addition, they provided management suggestions for these areas. Some individuals expressed the desire to restrict the management of lands with wilderness characteristics to the currently specified areas. These commentors cited limitations to recreation and potential economic impacts as reasons to limit expansion

### **3.3.8 Water, Soil, and Riparian Areas**

Thirty comments were received about water, soil, and riparian issues, representing 4.3 percent of the comments received on planning issues. Representative comments are included in **Appendix E, Table E-8**. Multiple comments were received on the importance of wetlands and riparian areas, especially as wildlife habitat. Individuals, CDOW, the US Environmental Protection Agency (EPA), and environmental organizations all requested that riparian and wetland areas be given protective special protection in the RMP. Suggested protection measures included limitations on trail and road development, as well as limitations on energy development. Additional concerns included source water protection areas and municipal watersheds, impacts to groundwater and drinking water, and erosion control.

### **3.3.9 Special Status Species Management**

Individuals, a state agency, and environmental groups commented on the management of listed species or candidates for listing at the state or federal level. 30 comments were received, about 4.3 percent of the total planning issue comments. Representative comments are included in **Appendix E, Table E-9**. The majority of commentors, which included individuals, environmental groups, and CDOW, expressed concern for the continued existence or preservation of habitat for a particular species or group of species. Species mentioned in multiple comments included burrowing owls, white-tailed prairie dogs, sage-grouse, and multiple aquatic species. Environmental organizations, including the Wilderness Society, stated the need to identify critical habitat and preserve habitat corridors to maintain viable populations of special status species. It further stated that BLM should establish monitoring and mitigation strategies. The CDOW recommended that the RMP require the development proponent to do field surveys for each of the rare species, using survey methods and effort levels that are appropriate for each of the target species.

### 3.3.10 Vegetation Management

Fifteen comments were received on this issue, representing 2.2 percent of the total number of comments received on planning issues. For representative comments, see **Appendix E, Table E-10**. Commentors included individuals, environmental groups, and the EPA. Comments included concerns over the spread of noxious weeds and support for the controlled use of fire as a vegetation management tool. Several comments were related to having a balance of seral stages and age classes within each vegetation type.

Some individuals and organizations urged for increased protection for some habitats. The Wilderness Society urged the BLM to protect rare plant habitat and to adopt specific management prescriptions in ACECs designated for rare plants. The Nature Conservancy in Colorado encouraged the BLM to preserve large tracts of land and sustain priority vegetation.

### 3.3.11 Air Quality

Thirteen comments were received about air quality in the planning area, representing approximately 1.9 percent of the total comments. Representative comments are included in **Appendix E, Table E-11**. The majority of the commentors requested additional monitoring and evaluations of air quality in the planning area. Additionally, commentors requested that the expertise, technology, and software to analyze air quality are present to ensure proper baseline data. Commentors were particularly concerned with the contribution of oil and gas production to local air pollutants. In addition, two comments requested additional dust-minimization requirements or BMPs.

In contrast, two commentors stated that air quality standards set by the EPA or state agencies are sufficient, and that the RMP should recognize the limited role that the BLM has in regulating air emissions.

### 3.3.12 Livestock Grazing

Ten planning issue comments were received about range health or upland management, representing 1.4 percent of the comments received on planning issues. Representative comments are included in **Appendix E, Table E-12**. Commentors generally supported the continuation of livestock grazing. Some suggestions were made for increased regulations and monitoring to maintain land health on grazing allotments. In addition, CDOW and one individual expressed support for the BLM to continue grazing management in accordance with the BLM's Standards for Public Land Health and Guidelines for Livestock Grazing Management in Colorado.

The CDOW also recommended several grazing allotments that could benefit from rotational grazing systems or water improvements and discussed the potential conflict between grazing in some areas and big horn sheep. The city of Grand Junction recommended that the RMP maintain the Whitewater Common

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Grazing Allotment as recommended in the BLM/City of Grand Junction's Land Health Assessment.

### **3.3.13 Cultural, Heritage, and Paleontological Resources and Native American Religious Concerns**

Ten comments were received on cultural, heritage, or paleontological resources, representing 1.4 percent of the planning issue comments received during scoping. Representative comments are included in **Appendix E, Table E-13**. Six commentors recommended that the RMP preserve areas with cultural or paleontological significance. Suggested protections include road closures and limitations on development. One commentor suggested that historical trails in Orchard Mesa and Whitewater be included in protected areas, while another commentor noted that the Tabaguache Trail has not been shown on the cultural map as an historic route. One commentor suggested that the Morrison Formation, the Mancos Shale (Formation), the Mesa Verde Group (Formation), and the Green River Formation, which have large outcrops in the Grand Valley and surrounding areas, should be given significant protection, as all contain abundant fossil material.

Additionally, four commentors expressed concerns that protection of cultural resources may negatively impact other resource uses. One commentor suggested that regulations for protection of cultural areas should be limited to existing state and federal law. Another stated that "frivolous claims" must be avoided.

### **3.3.14 Social and Economic Considerations**

Nine comments on social and economic considerations were received, representing 1.3 percent of comments received on planning issues. Representative comments are included in **Appendix E, Table E-14**. Commentors included a few individuals and one non-profit organization. Most comments were general in nature and requested that the BLM consider the impacts of the RMP on the local community. In addition, the Wilderness Society set out a detailed recommended approach for socioeconomic analysis.

### **3.3.15 Public Health and Safety**

Six planning issue comments were received related to issues of public health and safety, about .9 percent of the total planning issue comments. Representative comments are included in **Appendix E, Table E-15**. A number of individuals were concerned about the health and safety issues related to oil and gas development and transportation of waste material from this activity. In addition, the EPA expressed concerns with this subject and advised the BLM to prepare a Health Impact Assessment as part of the EIS.

### **3.3.16 Noise**

Five planning issue comments (.7 percent) were received related to issues of noise. Representative comments are included in **Appendix E, Table E-16**. All



commentors were concerned with the preservation of the natural soundscape and desired restrictions on activities, such as OHV use, that would alter the quiet, natural environment. Additional comments in Fish and Wildlife stated the importance of noise control for wildlife.

### 3.3.17 Drought Management / Climate Change

Two planning issue comments, (.3 percent) related to issues of drought management or climate change. Representative comments are included in **Appendix E, Table E-17**. These comments included a comment from an individual and a comment from the Wilderness Society directing the BLM to include climate change analysis in the RMP.

### 3.3.18 Other Issues To Be Addressed in the RMP

Of the 953 comments received, approximately 72.9 percent were related to planning issues that will be addressed in the RMP (as discussed above). Another 133 comments (13.9 percent) focused on other topics, such as the planning process in general, alternatives, or the public involvement process. These topics will be addressed in the RMP but do not fit within any particular planning issue category. **Table 3-2** summarizes the distribution of comments, followed by a discussion of the categories. Representative comments and the relevant classification are displayed in **Appendix E**.

**Table 3-2**  
**Issues Outside of Planning Issues To Be Addressed in RMP**

<b>Issue or Other Category</b>	<b>Total</b>	<b>Percent of Total Comments</b>
Process-oriented	50	5.3
Alternatives	8	0.8
Public Involvement Process/Collaboration	29	3.0
General Comments	46	4.8
<b>Total</b>	<b>133</b>	<b>13.9</b>

Process-orientated comments included comments on the requirements of NEPA, FLPMA, and the national Energy Policy Act, as well as other statutes, regulations, and orders, including the BLM Land Use Planning Handbook (H-1601-1). The majority of these comments were from environmental groups and energy-development businesses. These respondents advised the BLM of applicable statutes, regulations, orders, and the BLM Land Use Planning Handbook (H-1601-1) that it is required to comply with during the planning process. Also included in this category were a number of general comments related to cumulative impact assessment, mitigation measures, BMPs, and reclamation.

Comments on alternatives urge the BLM to develop alternatives that consider a variety of planning issues, including level of energy development, natural resource protection, and recreation.

Comments on the public involvement process were from individuals and included requests to involve particular agencies, organizations, and citizen groups in the planning process. In addition, commentors cited the need for ample public involvement opportunities at all steps in the process, particularly for travel management decisions.

General planning comments included comments on overarching issues such as the multiple-use mandate for land management, as well as comments expressing the desire to protect particular areas without reference to specific issues for these areas.

### 3.4 ISSUES THAT WILL NOT BE ADDRESSED IN THE RMP

Approximately 13.2 percent of the comments related to issues that will not be addressed in the RMP; these include issues resolved through policy or administrative action, issues that have already been addressed or will be addressed by the GJFO independent of the RMP, and issues beyond the scope of the RMP that have been considered but will not be included (**Table 3-3**). These comments are represented in **Appendix E**.

**Table 3-3**  
**Issues That Will Not Be Addressed in the RMP**

<b>Category</b>	<b>Total</b>	<b>Percent of Total Comments</b>
BLM administrative or policy issue	33	3.5
Issues that that have been or will be addressed by the GJFO outside of the RMP	60	6.3
Issues outside the scope of the RMP	32	3.4
<b>Total</b>	<b>125</b>	<b>13.2</b>

Administrative or policy issue comments included issues pertaining to national BLM policy that will not be addressed during the GJFO RMP process. Comments included the BLM standards used to classify recreational areas and measure route density as well as policies for management of lands with wilderness characteristics.

Issues that have been or will be addressed by the GJFO outside of the RMP process included implementation issues, surveys and monitoring, and educational programs. Implementation-related comments involved decisions that

require on-the-ground action following the RMP decisions. Comments in this category included requests for additional facilities and signage at recreation areas. Other comments requested completion of additional surveys and education of local communities and user groups. In addition, two comments involved complaints about previous GJFO actions that are outside the scope of this RMP.

Issues outside the scope of the RMP included comments about land management on areas outside the planning area. An example includes comments on mountain bike trails near Montrose, which is in the BLM's Uncompahgre Field Office jurisdiction. This category also included comments on issues in which the BLM has limited or no administrative authority such as a request to reduce crime in the Grand Junction area. Finally, included in this category are comments which are dependant on Congressional legislation, such as requests to add Wilderness Areas or WSAs or to rescind the BLM ban on the slaughter of wild horses.

### **3.5 ANTICIPATED DECISIONS**

The FLPMA requires the BLM to manage public lands using the principles of multiple use and sustained yield. Management direction resulting from the planning process for the RMP needs to be adaptable to changing conditions and demands over the life of the RMP. The RMP will provide management direction and guide decision making for determining appropriate multiple uses and allocation of resources. It will also include strategies to manage and protect resources and systems to monitor and evaluate the status of resources and the effectiveness of management practices. The BLM is reviewing the condition of the environment and the current management situation to identify which management directions should be continued, which should be modified, and which should be developed and added.

This scoping report does not make any decisions, nor does it change current management direction set forth in the 1987 GJFO RMP. Instead, it summarizes those issues identified during the scoping period. The BLM will use planning issues summarized in this scoping report, along with subsequently identified issues, planning criteria, and other information (such as occurrence and development potential for minerals), to help formulate a reasonable range of alternatives during the next phase of the RMP process. Each identified alternative (including continuation of existing management practices) will represent a complete and reasonable plan for managing the GJFO. Future decisions will occur at two levels: the RMP (or land use plan) level and the implementation level. These decision types are described below. In general, only land use plan-level decisions will be made as part of the RMP process. The BLM's evaluation of identified alternatives will be documented in an EIS prepared as part of the RMP process, as required under NEPA.

### 3.5.1 Future Land Use Plan-Level Decisions

Future RMP-level decisions will be made on a broad scale. These decisions will identify management direction and guide actions for the coming decades within the planning area. The RMP will provide a comprehensive yet flexible framework for managing the numerous demands on resources located on public lands.

The vision for the GJFO will be described in the RMP in terms of two categories of RMP-level decisions: 1) desired outcomes; and 2) allowable uses and actions to achieve desired outcomes. Desired outcomes will be expressed in terms of specific goals, standards, and objectives. Goals are broad statements of desired outcomes, such as ensuring sustainable development. Standards are descriptions of conditions or the degree of function required, such as land health standards. Objectives are specific, quantifiable, and measurable desired conditions for resources, such as managing sagebrush communities to achieve a certain canopy cover by 2015.

Allowable uses and actions to achieve desired outcomes will be expressed in the RMP as allowable uses, actions needed, and land tenure decisions. Livestock grazing, administrative designations (for example, ACECs), and land disposal are examples of some RMP-level decisions in this category.

### 3.5.2 Future Implementation Decisions

The RMP will contain broad-scale decisions that guide future land management actions. Subsequent site-specific implementation, often characterized as project-level or activity-level decisions, will require the BLM's final approval of on-the-ground actions. Implementation decisions require a more-detailed, site-specific environmental analysis that tiers off of the EIS prepared for the RMP. These decisions generally constitute final approval of on-the-ground actions to proceed (BLM Land Use Planning Handbook H-1601-1, Section IV[B]). An example of an implementation decision is the development and management of a recreation site. In some circumstances, site-specific implementation decisions may be made through the RMP process.

Implementation decisions generally constitute the BLM's final approval allowing on-the-ground actions to proceed. These types of decisions require site-specific planning and NEPA analysis. They may be incorporated into implementation plans (activity or project plans) or may exist as stand-alone decisions. Where implementation decisions are made as part of the land use planning process, they are still subject to the appeals process or other administrative review as prescribed by specific resource program regulations after the BLM resolves the protests to land use plan decisions and makes a decision to adopt or amend the RMP (*High Desert Multiple Use Coalition, Inc. et al. Keith Collins, 142 IBLA 285 [1998]*).

The most noteworthy implementation decisions will relate to the designation of roads and trails. The BLM Land Use Planning Handbook directs field offices to

complete a defined travel management network (system of areas, roads, and/or trails) during the development of the land use plan, to the extent practical. As part of the RMP revisions, the BLM is developing a complementary travel management plan for all BLM-managed lands within the GJFO. The revised RMP will comprehensively plan for all types of travel (recreational, casual, agricultural, industrial, administrative, etc.) and accompanying modes and conditions of travel, including motorized, mechanized, and non-mechanized (muscle-powered) uses. It is now Colorado BLM policy (CO-IM-2007-20) to restrict all off-highway vehicle use within limited areas to designated routes.

### **3.6 VALID EXISTING MANAGEMENT**

The BLM-administered public lands in the planning area are managed with direction from the 1987 Grand Junction RMP and its subsequent amendments. Preparation of an updated RMP is necessary to respond to changing resource conditions and to respond to new issues and federal policies. The RMP will establish new land use planning decisions to address issues identified through public scoping and, where appropriate, may incorporate decisions from the 1987 RMP, as amended. Determining which existing management decisions to carry forward is part of the planning process, and the BLM will review the existing management situation to determine which decisions to carry forward and will identify where new management guidance should be developed. This review will be documented in the Analysis of the Management Situation.

### **3.7 SPECIAL DESIGNATIONS, INCLUDING NOMINATIONS**

The special designations section of the RMP will include a discussion of designated areas such as ACECs, WSRs, and WSAs. It also will include new special management area designations, including ACECs and river segments eligible and suitable for inclusion in the National WSR System.

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# SECTION 4

## PLANNING CRITERIA

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During its initial planning sessions, the BLM GJFO staff developed preliminary planning criteria. Planning criteria establish constraints, guidelines, and standards for the planning process. They help planners define the scope of the process and estimate the extent of data collection and analysis. The plan will be completed in compliance with FLPMA, NEPA, and all other applicable laws, regulations, and policies. Impacts from the management alternatives considered in the revised RMP will be analyzed in an EIS developed in accordance with regulations at 43 CFR 1610 and 40 CFR 1500.

The following preliminary criteria were developed internally for the GJFO and presented for public comment. Additional suggested criteria received in public scoping comments are provided at the end of this list. After public input is analyzed, it becomes proposed criteria and can be added to or changed as the issues are addressed or as new information is presented. The GJFO managers will approve the issues and criteria, along with any changes.

### 4.1 PRELIMINARY PLANNING CRITERIA

1. Only public lands and split-estate lands managed by BLM are covered in the RMP. No decisions will be made relative to non-BLM-administered lands.
2. The planning process will follow 10 stages of an EIS-level planning process:
  - 1) conducting scoping;
  - 2) developing an Analysis of the Management Situation report;
  - 3) formulating alternatives;
  - 4) analyzing the alternatives' effects;
  - 5) selecting a preferred alternative;
  - 6) publishing a Draft RMP/EIS;
  - 7) providing a 90-day public comment period for the Draft RMP/EIS;
  - 8) preparing and publishing a Proposed Plan/Final EIS;
  - 9) providing a 30-day public protest period; and
  - 10) preparing a Record of Decision. For specific information, refer to the BLM Land Use Planning Handbook, H-1601-1.

3. For program-specific guidance of land use planning level decisions, the process will follow the Land Use Planning Manual 1601 and Handbook H-1601-1, Appendix C.
4. Broad-based public participation will be an integral part of the planning and EIS process.
5. Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent local, state, federal, and tribal agencies, as long as the decisions are consistent with the purposes, policies, and programs of federal law, and regulations applicable to public lands.
6. The RMP will recognize the State's responsibility and authority to manage wildlife.
7. The RMP will recognize the Office of Surface Mining's responsibility and authority to regulate coal activities.
8. The BLM will recognize the State's responsibility for permitting related to oil and gas activities and in regulating air quality impacts.
9. The BLM will recognize the State's and Counties' responsibility for permitting related to mineral extraction activities (i.e., uranium, gold, coal, and sand and gravel), and in regulating water quality impacts.
10. The National Sage-Grouse Strategy requires that impacts to sagebrush habitat and sagebrush-dependent wildlife species be analyzed and considered in BLM land use planning efforts for public lands with sagebrush habitat in the planning area.
11. The RMP will recognize valid existing rights.
12. The RMP/EIS will incorporate existing adequate management decisions brought forward from existing planning documents.
13. The planning team will work cooperatively and collaboratively with cooperating agencies and all other interested groups, agencies, and individuals.
14. The BLM and cooperating agencies will jointly develop alternatives for resolution of resource management issues and management concerns.
15. The planning process will incorporate the Standards for Healthy Rangelands and Guidelines for Livestock Grazing Management for Public Lands Administered by the Bureau of Land Management in the State of Colorado as goal statements.



16. Areas with special environmental quality will be protected and, if necessary, designated as ACECs, WSRs, or other appropriate designations.
17. Any public land surface found to meet the suitability factors to be given further consideration for inclusion in the National WSR System will be addressed in the RMP revision effort in terms of developing interim management options in the EIS alternatives.
18. The WSAs will continue to be managed under the Interim Management Policy for Lands under Wilderness Review until Congress either designates all or portions of the WSA as wilderness or releases the lands from further wilderness consideration. It is no longer the policy of the BLM to make formal determinations regarding wilderness character, to designate additional WSAs through the RMP process, or to manage any lands other than existing WSAs in accordance with the Interim Management Policy.
19. Forest management strategies will be consistent with the Healthy Forests Restoration Act. Fire management strategies will be consistent with the Colorado Fire Management Plan (2005).
20. The planning process will involve American Indian tribal governments and will provide strategies for the protection of recognized traditional uses.
21. Any location-specific information pertaining to cultural or paleontological resources (either map, description, or photo) is proprietary to the BLM and will not become the property of any contractors working on the EIS or attached to any document (paper or electronic), nor is this information subject to any public release or Freedom of Information Act requests (36 CFR 7.18).
22. All proposed management actions will be based upon current scientific information, research, and technology, as well as existing inventory and monitoring information.
23. The RMP will include adaptive management criteria and protocol to deal with future issues.
24. The planning process will use the BLM Colorado Mitigation Guidelines to develop management options and alternatives and to analyze their impacts. The guidelines will also be part of the planning criteria for developing the options and alternatives, as well as for determining mitigation requirements.
25. A reasonable foreseeable development scenario for fluid minerals will be developed from analysis of past activity and production, which will aid in the environmental consequences analysis.

26. Planning and management direction will be focused on the relative values of resources and not on the combination of uses that will give the greatest economic return or economic output.
27. Where practicable and timely for the planning effort, current scientific information, research, and new technologies will be considered.

#### **4.2 ADDITIONAL SUGGESTIONS FOR PLANNING CRITERIA**

The following issues were suggested as additional planning criteria in public scoping comments:

1. The BLM must address wilderness as a separate and unique issue in the planning process, including in its planning criteria.
2. The BLM will incorporate key aspects of its off-road vehicle regulations, as well as ecological metrics, in planning criteria.
3. The National Sage-Grouse Strategy criteria should state that impacts to sagebrush-dependent wildlife will be minimized whenever possible. Current scientific information should be used, especially regarding buffer areas around leks, nesting areas, and brood raising areas for both sage-grouse species.

## **SECTION 5**

### **DATA SUMMARY/DATA GAPS**

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As part of the RMP planning, evaluation, and data-collection process, the BLM has inventoried available information and has identified data needs for travel management, community involvement, the potential designation of WSRs, Class I cultural data, and Native American consultation. Travel management data-collection workshops were held with the public in February 2009 so the BLM could obtain updated information on existing routes and use of these routes. Community assessment meetings are being conducted by Mesa State College in 2009 to involve the local community in the land use planning process and to determine their visions for local public land use. A WSR suitability study is underway to determine the suitability of eligible river segments within the planning area. The Class I Cultural Resource data currently in use dates from 1993. A new Class I survey is underway and issues and management considerations provided from this survey will be included in the draft RMP. Finally, information obtained in the ongoing Ethnohistory Project, to be completed in late 2009, and through additional tribal consultation will be used in formation of management alternatives.

Both new data and existing resource information will be used in formulating resource objectives and management alternatives. To facilitate this process, information is being compiled and put into digital format for use in analysis and map production using Geographic Information Systems (GIS). Because this information is imperative to quantify resources, to update maps, and to manipulate information during alternative formulation, this process must be completed before actual analysis can begin. New data generated during the RMP process will be used to address planning issues and will meet applicable established standards.

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# SECTION 6

## FUTURE STEPS

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### 6.1 SUMMARY OF FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The next phase of the BLM's planning process is to develop draft management alternatives based on the issues presented in Sections 3.2 (Planning Issue Statements) and 3.3 (Public Comments by Planning Issue Category) of this scoping report. These alternatives will address planning issues identified during scoping and will meet goals and objectives to be developed by the interdisciplinary team. In compliance with NEPA, CEQ regulations, and the BLM planning regulations and guidance, alternatives should be reasonable and capable of implementation. The BLM will also continue to meet with collaborating agencies, interested tribes, and community groups and individuals. A detailed analysis of the alternatives will be completed, and the BLM's preferred alternative will then be identified. The preferred alternative is often made up of a combination of management option components from the various alternatives to provide the best mix and balance of multiple land and resource uses to resolve the issues.

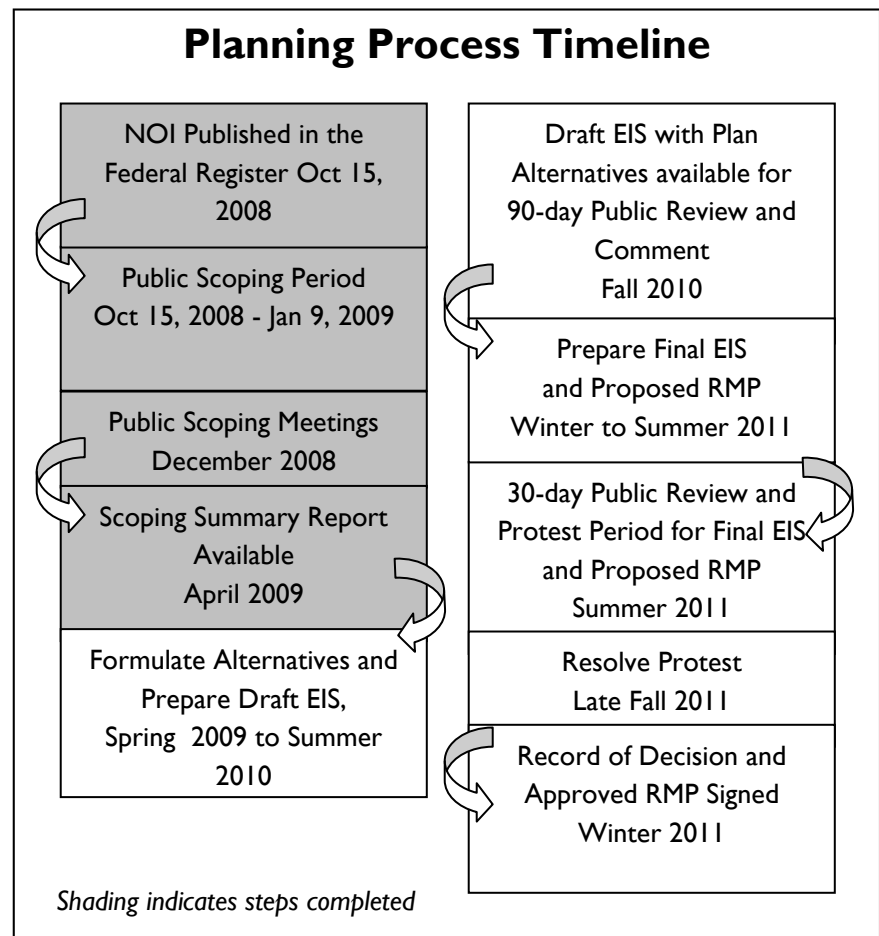
The analysis of the alternatives will be documented in a Draft RMP/EIS. Although the BLM welcomes public input at any time during the planning process, the next official public comment period will begin when the Draft RMP/EIS is published, which is anticipated in 2010. The draft document will be widely distributed to elected officials, regulatory agencies, and members of the public, and it will be available on the project Web site. The availability of the draft document will be announced via a Notice of Availability in the *Federal Register*, and a 90-day public comment period will follow. Public meetings will be held throughout the project area during the 90-day comment period.

At the conclusion of the public comment period, the Draft RMP/EIS will be revised. A Proposed RMP/Final EIS will then be published. The availability of the proposed document will be announced in the *Federal Register*, and a 30-day public protest period will follow regarding the proposed planning level decisions

(43 CFR Part 1610.5.2.). If necessary, a notice will be published in the *Federal Register* requesting comments on significant changes made as a result of protest. Concurrently, the Governor of Colorado will review the document for consistency with approved state and local plans, policies, and programs.

At the conclusion of the public protest period and the Governor's consistency review, the BLM will resolve all protests and any inconsistencies, and the approved RMP and Record of Decision will be published. The availability of these documents will be announced in the *Federal Register*. Any implementation-level decisions in the RMP, such as travel route designations, are not subject to the protest process but instead are subject to administrative remedies set forth in regulations applicable to the specific resource management program. These remedies generally take the form of appeals to the Office of Hearings and Appeals within 30 days of the effective date of the Record of Decision or in accordance with the provisions of 43 CFR 4.4.

All publications, including this report, newsletters, the Draft RMP/EIS, and the Notice of Availability, will be published on the official GJFO RMP Web site. In addition, pertinent dates regarding solicitation of public comments will be published on the Web site.



## 6.2 CONTACT INFORMATION

The public is invited and encouraged to participate throughout the planning process for the RMP. Some ways to participate include the following:

- Reviewing the progress of the RMP at the official GJFO RMP/EIS Web site at: <http://www.blm.gov/co/st/en/fo/gjfo.html>, which will be updated with information, documents, and announcements throughout the duration of the RMP preparation; and
- Requesting to be added to or to remain on the official GJFO RMP project mailing list in order to receive future mailings and information.

Anyone wishing to be added to or deleted from the distribution list or requesting further information may email a request to [gjfo\\_rmp@blm.gov](mailto:gjfo_rmp@blm.gov) or contact Mr. Matt Anderson, RMP Project Manager at BLM, Grand Junction Field Office, 2815 H Road, Grand Junction, CO 81506, phone 970-244-3027. Please provide your name, mailing address, and email address, as well as your preferred method to receive information.

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# **APPENDIX A**

## **NOTICE OF INTENT**

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The attached pages from the *Federal Register* include the NOI for the GJFO RMP/EIS. The NOI was published on October 15, 2008, initiating the scoping process for the project.

applications should be submitted to the Director (address above). Anyone requesting a hearing should give specific reasons why a hearing would be appropriate. The holding of such a hearing is at the discretion of the Director.

The following applicants request permits to import polar bears (*Ursus maritimus*) taken from the Gulf of Boothia polar bear population in Canada as sport hunted trophies for the purpose of enhancement of the survival of the species under section 104(c)(4)(A) of the MMPA because these specimens would not be eligible for importation under 104(c)(5)(A). These specimens were taken prior to the date when the Endangered Species Act prohibitions would apply.

*Applicant:* Dennis H. Dunn, Kirkland, WA, PRT-189427.

*Applicant:* Keith C. Halstead, Greenville, SC, PRT-189429.

*Applicant:* Keith J. Atcheson, Butte, MT, PRT-189430.

*Applicant:* Kevin J. Wiczorek, Chesterfield, MI, PRT-189431.

*Applicant:* Marcus C. Hansen, Chester Springs, PA, PRT-189432.

*Applicant:* Ben A. Hamel, Petoskey, MI, PRT-189434.

*Applicant:* Aaron R. Neilson, Royse City, TX, PRT-191814.

Concurrent with the publication of this notice in the **Federal Register**, the Division of Management Authority is forwarding copies of the above applications to the Marine Mammal Commission and the Committee of Scientific Advisors for their review.

Dated: September 5, 2008.

**Lisa J. Lierheimer,**

*Senior Permit Biologist, Branch of Permits, Division of Management Authority.*

[FR Doc. E8-24550 Filed 10-14-08; 8:45 am]

BILLING CODE 4310-55-P

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[AA-11265, AA-9807, AA-9515, AA-9804, AA-9742, AA-9891, AA-9887, AA-9672, AA-10191, AA-11366, AA-9650, AA-9649, AA-10281, AA-10194, AA-9679; AK-962-1410-HY-P]

### Alaska Native Claims Selection

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of decision approving lands for conveyance.

**SUMMARY:** As required by 43 CFR 2650.7(d), notice is hereby given that an appealable decision approving lands for conveyance pursuant to the Alaska

Native Claims Settlement Act will be issued to Calista Corporation for lands located in the vicinity of Newtok and Chefnak, Alaska. Notice of the decision will also be published four times in the Anchorage Daily News.

**DATES:** The time limits for filing an appeal are:

1. Any party claiming a property interest which is adversely affected by the decision shall have until November 14, 2008 to file an appeal.

2. Parties receiving service of the decision by certified mail shall have 30 days from the date of receipt to file an appeal.

Parties who do not file an appeal in accordance with the requirements of 43 CFR Part 4, Subpart E, shall be deemed to have waived their rights.

**ADDRESSES:** A copy of the decision may be obtained from: Bureau of Land Management, Alaska State Office, 222 West Seventh Avenue, #13, Anchorage, Alaska 99513-7504.

**FOR FURTHER INFORMATION CONTACT:** The Bureau of Land Management by phone at 907-271-5960, or by e-mail at [ak.blm.conveyance@ak.blm.gov](mailto:ak.blm.conveyance@ak.blm.gov). Persons who use a telecommunication device (TTD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8330, 24 hours a day, seven days a week, to contact the Bureau of Land Management.

**Judy A. Kelley,**

*Land Law Examiner, Resolution Branch (962).*

[FR Doc. E8-24389 Filed 10-14-08; 8:45 am]

BILLING CODE 4310-JA-P

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[CO 130 2009 001]

### Notice of Intent To Prepare a Resource Management Plan (RMP) and Associated Environmental Impact Statement (EIS) and Initiate the Public Scoping Process

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of intent.

**SUMMARY:** Notice is hereby given that the Bureau of Land Management (BLM), Grand Junction Field Office (GJFO), Colorado, is initiating a planning effort to prepare the Grand Junction RMP and associated EIS. The RMP will replace the existing 1987 Resource Management Plan.

**DATES:** The scoping comment period will commence with the publication of this notice and will end on January 9, 2009. However, collaboration with the

public will continue throughout the planning process. Public meetings will be announced through the local news media, newsletters, and a BLM Web site at least 15 days prior to the event. Comments on issues and planning criteria should be received on or before the end of the scoping period at the address listed below.

**ADDRESSES:** Written comments should be sent to the Grand Junction Field Office, Bureau of Land Management, 2815 H Road, Grand Junction, CO 81506 or via fax at (970) 244-3083. E-mail comments may be set to [GJFO\\_mail@blm.gov](mailto:GJFO_mail@blm.gov). Comments, including names and addresses of respondents, will be available for public review at the BLM GJFO, during regular business hours 7:30 a.m.-4:30 p.m., Monday-Friday, except holidays. Individual respondents may request confidentiality. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

**FOR FURTHER INFORMATION CONTACT:** For further information and/or to have your name added to our mailing list; contact Matt Anderson, Project Manager, Telephone (970) 244-3027. Project documents may be reviewed on BLM's Grand Junction's Field Office Web site at <http://www.blm.gov> (select Grand Junction on the interactive map).

**SUPPLEMENTARY INFORMATION:** The purpose of the public scoping process is to identify issues that should be considered in the RMP/EIS and to initiate public participation in the planning process. BLM personnel will also be present at scoping meetings to explain the planning process and other requirements for preparing the RMP/EIS. The planning area includes lands within the BLM GJFO administrative boundary. The GJFO RMP decision area encompasses about 1.2 million acres of public lands, which are located within Mesa, Garfield, Montrose, and Delta Counties, Colorado. The decision area includes public lands administered by the BLM GJFO, and does not include

private lands, state lands, tribal trust lands, federal lands not administered by the BLM, lands located within the planning area of the RMP for the McInnis Canyons National Conservation Area and associated Wilderness Area.

The plan will fulfill the needs and obligations set forth by the National Environmental Policy Act (NEPA) and associated Council of Environmental Quality Regulations 40 CFR part 1500. The plan also fulfills requirements of the Federal Land Policy and Management Act (FLPMA: 43 U.S.C. 1711), applicable planning regulations at 43 CFR part 1600, and BLM management policies.

Parties interested in leasing and development of Federal coal in the planning area should provide coal resource data for their area(s) of interest. Specifically, information is requested on the location, quality, and quantity of Federal coal with development potential, and on surface resource values related to the 20 coal unsuitability criteria described in 43 CFR part 3461. This information will be used for any necessary updating of coal screening determination (43 CFR 3420.1-4) in the area and in the environmental analysis. In addition to coal resource data, the BLM seeks resource information and data for other public land values (e.g., air quality, cultural and historic resources, fire/fuels, fisheries, forestry, lands and realty, non-energy minerals and geology, oil and gas (including coalbed methane), paleontology, rangeland management, recreation, soil, water, and wildlife) in the planning area. The purpose of this request is to assure that the planning effort has sufficient information and data to consider a reasonable range of resource uses, management options, and alternatives for the public lands.

Proprietary data marked as confidential may be submitted in response to this call for coal and other resource information. Please submit all proprietary information submissions to the address listed above. The BLM will treat submissions marked as "Confidential" in accordance with the laws and regulations governing the confidentiality of such information.

The BLM GJFO will work collaboratively with interested parties to identify the management actions and decisions that are best suited to local, regional, and national needs and concerns of the public, subject to planning criteria to be developed to guide the plan. Preliminary issues and management concerns have been identified by the BLM, other agencies, and meetings with individuals and user

groups. The major issue themes to be addressed in the RMP effort include:

- Management and protection of public land resources while allowing for multiple uses.
- Management of riparian areas and water quality concerns.
- Recreation/visitor use and safety management.
- Travel management, including Off Highway Vehicle.
- Management of areas with special values.
- Energy and minerals management.
- Management of wildlife habitat including protection of sensitive species habitat.
- Community expansion and urban interface.
- Land Tenure Adjustments.

After gathering public comments, issues will be placed in one of three categories.

1. Issues to be resolved by the plan;
2. Issues resolved through policy or administrative action; or
3. Issues beyond the scope of this plan.

Rationale will be provided in the plan for each issue placed in category two or three. In addition to these major issues, a number of management questions and concerns will be addressed in the plan. The public is encouraged to help identify these questions and concerns during the scoping phase. An interdisciplinary approach will be used to develop the plan in order to consider the variety of issues and concerns identified. Disciplines involved in the planning process will include specialists with expertise in rangeland management, minerals and geology, outdoor recreation, archaeology, paleontology, wildlife, fisheries, wild horse, weeds, lands and realty, hydrology, soils, engineering, fire, wilderness, hazardous materials, and social and economic. The BLM has identified some preliminary planning criteria to guide the development of the plan. The following planning criteria have been proposed to guide the development of the plan, to avoid unnecessary data collection and analyses, and to ensure the plan is tailored to issues. Other criteria may be identified during the public scoping process. Proposed planning criteria include the following:

- The plan will comply with all applicable laws, regulations and current policies.
- Broad-based public participation will be an integral part of the planning and EIS process.
- The plan will recognize valid existing rights.
- Areas with special designations as appropriate.

Dated: October, 2008.

**Raul Morales,**

*Associate Field Manager, Grand Junction Field Office.*

[FR Doc. E8-24374 Filed 10-14-08; 8:45 am]

**BILLING CODE 4310-22-P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[NV-040-07-5101-ER-F344; N-78091]

#### Notice of Availability of the Final Environmental Impact Statement for a Proposed Coal-Fired Electric Power Generating Plant in Eastern White Pine County, NV

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of availability.

**SUMMARY:** Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) of 1969, a Final Environmental Impact Statement (Final EIS) has been prepared by the Bureau of Land Management (BLM), Ely Field Office for the White Pine Energy Station (WPES) and is now available. This document evaluates the environmental effects of constructing a coal-fired electric power generating plant (up to 1,600-megawatts) and associated features on public lands in White Pine County, Nevada.

**DATES:** The Final EIS will be available for review until November 3, 2008, which is 30 days following the date the EPA published their notice in the **Federal Register**, [73 FR 57620].

**ADDRESSES:** The Final EIS and associated documents will be available for review in hard copy and on compact disk at the following locations:

- University of Nevada-Reno, Getchell Library, Government Publication Dept., Reno, NV 89507
- Washoe County Library, 301 South Center Street, Reno, NV 89501
- White Pine County Library, 950 Campton Street, Ely, NV 89301
- Clark County Library, 1401 E. Flamingo Rd., Las Vegas, NV 89119

A limited number of copies of the document will be available at the following BLM offices:

- Elko Field Office, 3900 Idaho Street, Elko, NV 89801
- Carson City Field Office, 5665 Morgan Mill Road, Carson City, NV 89701
- Ely Field Office, 702 North Industrial Way, Ely, NV 89301-9408
- Nevada State Office, 1340 Financial Boulevard, Reno, NV 89502-7147
- Washington Office of Public Affairs, 18th and C Street, NW., Washington, DC 20240

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# **APPENDIX B**

## **BLM COMMENT FORM**

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The BLM comment form that follows was distributed at the public scoping open houses in December 2008. The form was also provided online at the project Web site and as an insert in project newsletters mailed to the distribution list in November 2008.

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**Bureau of Land Management  
Grand Junction Field Office**



We encourage you to provide your comments. Comments submit on or before **January 9, 2009** will be accepted. Please mail your completed form to the address on the opposite side or fax to 1-866-625-0707. You are also welcome to submit your comments by email to [gjfo\\_rmp@blm.gov](mailto:gjfo_rmp@blm.gov).

Your Name \_\_\_\_\_ Date \_\_\_\_\_

Mailing Address \_\_\_\_\_ City/State/Zip \_\_\_\_\_

E-Mail Address \_\_\_\_\_

Would you like to be added to this project's mailing list to receive future project-related information?  
email materials only  email and hard-copy materials  No

Please indicate your affiliation by checking **one** of the following boxes:

- Individual (no affiliation)
- Non-Profit Organization
- Citizen's Group
- Federal, State, or Local Government
- Elected Representative
- Regulatory Agency

Name of organization, government, group, or agency (if applicable) \_\_\_\_\_

***The BLM wants to hear from you! The following questions have been provided to help guide you in providing comments that are within the scope of this project. Other project related comments are welcome.***

1) In this newsletter we have identified issue categories based on lands and resources in the planning area. Please provide comments on these issues or and/or identify other planning issues that you think should be considered.

2) What geographic areas within the Grand Junction Field Office do you particularly value? Why?

Respondents' comments, including their names and street addresses, will be available for public review at the Grand Junction Field Office during regular business hours from 7:30 a.m. to 4:30 p.m., Monday through Friday, except holidays, and may be published as part of the EIS. Individual respondents may request confidentiality. If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comments. Such requests will be honored to the extent allowed by law. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

3) Please provide any additional comments that you have regarding this project.

\_\_\_\_\_ (Please fold this sheet in half & tape shut before mailing – Do not staple) \_\_\_\_\_

Place  
First Class  
Stamp  
Here

**Grand Junction Field Office RMP  
c/o EMPS, Inc.\*  
3775 Iris Ave., Suite 1A  
Boulder, CO 80301**

*\*Acting as a contracted agent  
for the Bureau of Land Management*



# **APPENDIX C**

## **NEWSLETTER**

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The first project newsletter was mailed to the distribution list in November 2008.

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US Department of the Interior  
Bureau of Land Management  
Volume I, November 11, 2008

# The Grand Junction RMP Newsletter

## Introduction

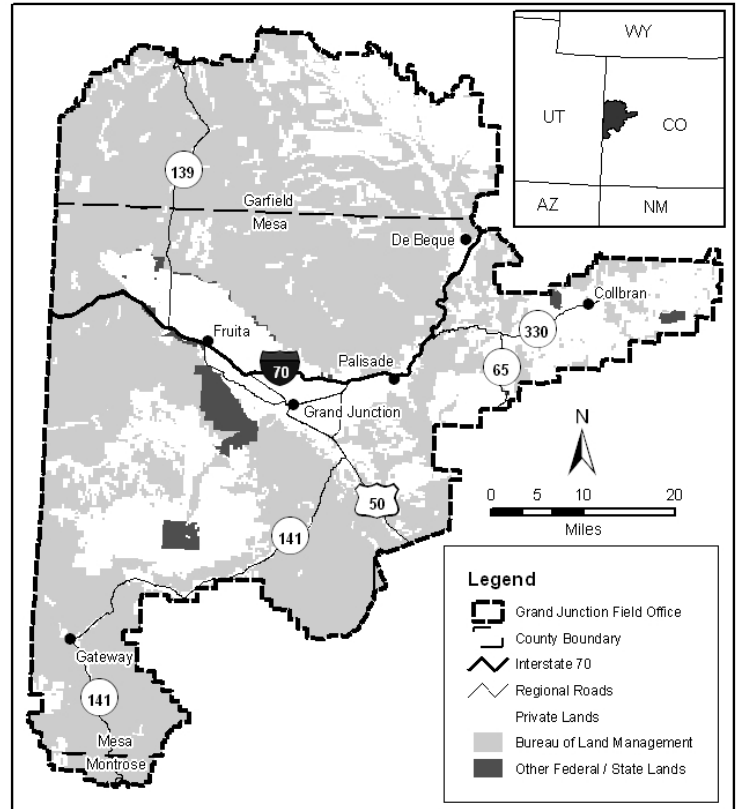
The Bureau of Land Management (BLM) Grand Junction Field Office is preparing a Resource Management Plan (RMP) to guide management of the 1.2 million acres of public land (surface) and 1.45 million acres of federal mineral estate (subsurface) that it administers (see map insert). The RMP will be prepared as a dynamic and flexible plan to allow evolving management to reflect the changing needs of the planning area over the next two decades, and will replace the current plan that was developed in 1987. In order to provide a comprehensive plan, the BLM requests input from you to help us identify issues and concerns within and adjacent to the planning area and to finalize the planning criteria that will be used to evaluate these issues.

## BLM Grand Junction Field Office Planning Area

The BLM is an agency in the US Department of the Interior that administers 258 million surface acres of America's public lands, located primarily in 12 western states. The BLM is separated into state offices and further into field offices. The RMP is being prepared by the Grand Junction Field Office, located in the western portion of Colorado.

The boundary of the **planning area** encompasses lands in Mesa, Garfield, Montrose, and Delta counties. Management direction outlined in the RMP will apply only to the **1.2 million acres of public land** (surface) and **1.45 million acres of federal mineral estate** (subsurface) administered by the BLM within these counties. No management direction will be developed for private or state lands.

The BLM-administered public lands within the Grand Junction Field Office planning area are currently managed in accordance with the decisions in the 1987 Grand Junction RMP. The BLM has completed approximately 50 maintenance actions and 12 plan amendments since the 1987 Record of Decision was signed. Preparation of an updated Grand Junction RMP is necessary to respond to changing resource conditions, to respond to new issues and federal policies, and to prepare a comprehensive framework for managing public lands administered by the field office. The RMP will establish new land use planning decisions to address issues identified through public scoping and, where appropriate, may incorporate decisions from the existing Grand Junction RMP, as amended.



**Mark your calendar!**  
Upcoming open houses

**Tuesday December 2, 2008**

Two Rivers Convention Center  
159 Main Street, Grand Junction, CO

**Wednesday December 3, 2008**

Grand Center  
182 N. 500 West, Moab, UT


**Thursday December 4, 2008**

Collbran Auditorium  
102 Main Street, Collbran, CO

**All meetings will be from 5:00 pm to 7:00 pm.**  
**Informal presentations at 6 pm.**

## What is an RMP?


An RMP is a land use plan that describes broad multiple-use guidance for managing public lands administered by the BLM. The Federal Land Policy and Management Act directs the BLM to develop such land use plans and to provide for appropriate uses of public lands. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. The RMP will accomplish the following:

- ◆ Establish goals and objectives for resource management and the measures needed to achieve those goals and objectives;
- ◆ Identify lands that are open and available for certain uses, including any restrictions, and lands that are closed to certain uses; and
- ◆ Provide comprehensive management direction for and/or allocate use of all resources. 


## What is Public Scoping and How Can You Participate?

Public involvement is an integral part of preparing the Grand Junction Field Office RMP. This public scoping period gives the public and other interested agencies and organizations the opportunity to provide comments on issues to be addressed and methods to be used in this plan before BLM begins drafting it. The official scoping period began on October 15, 2008 with the publication of the Notice of Intent (NOI) in the *Federal Register* and will continue until January 9, 2009. During the scoping period, the BLM will host three public open houses in Grand Junction and Collbran, CO and Moab, UT. Notices providing information on these meetings will be published in the local newspapers and distributed within the planning area.

The public is formally invited and encouraged to participate in the planning process for the RMP during the public scoping period. Some ways you can participate are as follows:

- ◆ Attending one or more of the open house meetings to learn about the project and planning process and to meet BLM representatives;
- ◆ Reviewing the progress of the RMP on-line at the official Grand Junction RMP Web site at <http://www.blm.gov/co/st/en/fo/gjfo.html>. The Web site will be updated with information, documents, and announcements during the initial scoping process and throughout the duration of the RMP preparation;
- ◆ Joining the Grand Junction Field Office RMP mailing list in order to receive future mailings and information, by:
  - Returning the comment form on the insert of this newsletter by mail;
  - E-mailing us at [gjfo\\_rmp@blm.gov](mailto:gjfo_rmp@blm.gov); or
  - Contacting Matt Anderson at 970-244-3027 or [Matt\\_Anderson@blm.gov](mailto:Matt_Anderson@blm.gov). 

## Anticipated Planning Issues

A planning issue is a matter of controversy over a resource management topic that is well defined and entails alternative actions or decisions. Based on the lands and resources that we manage, the BLM has identified categories of issues (see box above). We expect most public issues and concerns fall within one of these themes. However, we do not presume that this is an all-inclusive list and may revise it based on the comments we receive. The BLM requests your comments on these or other issues on or adjacent to BLM-administered lands within the Grand Junction Field Office planning area. See the article on *What is Public Scoping and How Can You Participate?* to see how you can submit your comments. 

### Issues Categories

- *Energy Development*
- *Vegetation Management*
- *Invasive/Noxious Weeds*
- *Forestry & Woodlands*
- *Drought Management/Climate Change*
- *Recreation*
- *Wilderness*
- *Special Designation Areas*
- *Travel Management*
- *Lands and Realty/Community Growth and Expansion*
- *Special Status Species Management*
- *Wildland Fire Management*
- *Wildlife and Fish*
- *Cultural Resources, Heritage Resources, Native American Religious Concerns, and Paleontological Resources Management*
- *Air Quality*
- *Soil and Water*
- *Wild Horses*
- *Wildland-Urban Interface*
- *Public Safety*
- *Social and Economic Considerations*

***“This resource management planning effort will shape the future of the tremendous resources that the Grand Junction Field Office manages, as well as the quality of life for those living around and visiting these lands,”*** said Grand Junction BLM Field Manager Catherine Robertson. ***“It is essential to the success of this plan that the public is involved throughout the process. The BLM will provide ample opportunities for the public to roll up their sleeves up and be engaged.”***

---

## Preliminary Planning Criteria

During its initial planning sessions, the Grand Junction BLM staff developed the preliminary planning criteria listed on this page. Planning criteria establish constraints, guidelines, and standards for the planning process. They help planners to define the scope of the process and estimate the extent of data collection and analysis. The BLM requests your input and may modify these criteria based on your comment. In order to submit comments, see the article on *What is Public Scoping and How Can You Participate?*

---

The plan will be completed in compliance with the Federal Land Policy and Management Act (43 U.S.C. 1701 et seq.) the National Environmental Policy Act (NEPA), and all other applicable laws, regulations, and policies.

---

*Impacts from the management alternatives considered in the revised RMP will be analyzed in an Environmental Impact Statement (EIS) developed in accordance with regulations at 43 CFR 1610 and 40 CFR 1500.*

---

Only public lands and split-estate lands managed by BLM are covered in the RMP. No decisions will be made relative to non-BLM administered lands.

---

*The planning process will follow ten stages of an EIS-level planning process: conducting scoping, development of a Management Situation Analysis report, formulation of alternatives, analysis of the alternatives' effects, selection of a preferred alternative, publication of a Draft RMP/EIS, providing a 90-day public comment period for the Draft, preparation and publication of a Proposed Plan/Final EIS, providing a 30-day public protest period, and preparation of a Record of Decision. For specific information, please see the Land Use Planning Handbook, H-1601-1.*

---

For program specific guidance of land use planning level decisions, the process will follow the Land Use Planning Manual 1601 and Handbook H-1601-1, Appendix C.

---

*Broad-based public participation will be an integral part of the planning and EIS process.*

---

Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent local, state, federal, and tribal agencies as long as the decisions are consistent with the purposes, policies, and programs of federal law, and regulations applicable to public lands.

---

*The RMP will recognize the State's responsibility and authority to manage wildlife.*

---

The RMP will recognize the Office of Surface Mining's responsibility and authority to regulate coal activities.

---

*BLM will recognize the State's responsibility for permitting related to oil and gas activities and in regulating air quality impacts.*

---

BLM will recognize the State's responsibility for permitting related to uranium, coal and sand and gravel activities, and in regulating water quality impacts.

---

*The National Sage-grouse Strategy requires that impacts to sagebrush habitat and sagebrush-dependent wildlife species be analyzed and considered in BLM land use planning efforts for public lands with sagebrush habitat in the planning area.*

---

The RMP will recognize existing rights.

---

*The RMP/EIS will incorporate existing adequate management decisions brought forward from existing planning documents.*

The planning team will work cooperatively and collaboratively with cooperating agencies and all other interested groups, agencies, and individuals.

---

*The BLM and cooperating agencies will jointly develop alternatives for resolution of resource management issues and management concerns.*

---

The planning process will incorporate the Standards for Healthy Rangelands and Guidelines for Livestock Grazing Management for Public Lands Administered by the Bureau of Land Management in the State of Colorado as goal statements.

---

*Areas with special environmental quality will be protected and if necessary designated as ACECs, Wild and Scenic Rivers, or other appropriate designations.*

---

Any public land surface found to meet the suitability factors to be given further consideration for inclusion in the W&SR System will be addressed in the RMP revision effort in terms of developing interim management options in the alternatives for the EIS.

---

*Wilderness Study Areas will continue to be managed under the Interim Management Policy for Lands under Wilderness Review until Congress either designates all or portions of the WSA as wilderness or releases the lands from further wilderness consideration. It is no longer the policy of the BLM to make formal determinations regarding wilderness character, to designate additional WSAs through the RMP process, or to manage any lands other than existing WSAs in accordance with the Wilderness IMP.*

---

Forest management strategies will be consistent with the Healthy Forests Restoration Act.

---

*Fire Management strategies will be consistent with the Colorado Fire Management Plan (2005).*

---

The planning process will involve American Indian tribal governments and will provide strategies for the protection of recognized traditional uses.

---

*Any location specific information pertaining to cultural resources (either map, description, or photo) is proprietary to the BLM and will not become the property of any contractors working on the EIS or attached to any document (paper or electronic), nor is this information subject to any public release or FOIA requests (36CFR 7.18).*

---

All proposed management actions will be based upon current scientific information, research and technology, as well as existing inventory and monitoring information.

---

*The RMP will include adaptive management criteria and protocol to deal with future issues.*

---

The planning process will use the BLM Colorado Mitigation Guidelines to develop management options and alternatives, and analyze their impacts. The guidelines will also be part of the planning criteria for developing the options and alternatives, as well as for determining mitigation requirements.

---

*A reasonable foreseeable development scenario for fluid minerals will be developed from analysis of past activity and production, which will aid in the environmental consequences analysis.*

---

Planning and management direction will be focused on the relative values of resources and not the combination of uses that will give the greatest economic return or economic output.

---

*Where practicable and timely for the planning effort, current scientific information, research, and new technologies will be considered.*

---

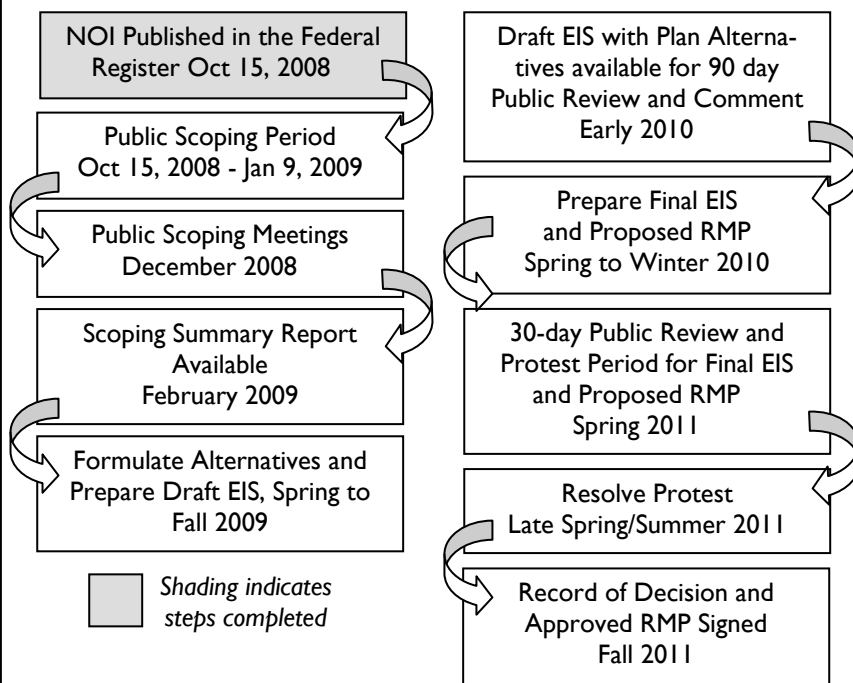
## Newsletter index

Introduction.....	1
BLM Grand Junction Planning Area.....	1
What is an RMP.....	2
Mark your Calendar.....	2
What is Public Scoping and how can you participate?.....	2
Anticipated Planning Issues.....	2
Preliminary Planning Criteria.....	3
Planning Process Timeline.....	4
How to Contact Us.....	4

## Commonly Used Acronyms

BLM	Bureau of Land Management
EIS	Environmental Impact Statement
IDT	Interdisciplinary Team
NOI	Notice of Intent
RMP	Resource Management Plan

## Planning Process Timeline



Printed on Recycled Paper

**How to contact us**

If you have questions about the RMP, please contact:

Mr. Matt Anderson  
 Bureau of Land Management  
 Grand Junction Field Office  
 2815 H Road  
 Grand Junction, CO 81506  
 970-244-3027  
 gjfo\_rmp@blm.gov

**BLM Grand Junction Field Office**

**Official Business  
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US Department of the Interior  
 Bureau of Land Management  
 Grand Junction Field Office  
 2815 H Road  
 Grand Junction, CO 81506



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# APPENDIX D

## LIST OF COMMENTORS

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The formal scoping process began on October 15, 2008, with the publication of the NOI in the *Federal Register* (**Appendix A**). The scoping period continued until January 9, 2009. **Table D-I** lists the commentors who sent written submissions to the BLM for the GJFO RMP/EIS as part of the public scoping process. The commentors are listed in chronological order of when their comments were received.

**Table D-I**  
**Commentors Who Submitted Written Comments during the Scoping Period**

Commentor Name	Affiliation	Date Submitted
<b>Businesses/ Commercial Organizations</b>		
Linda Van der Veer	Law office of Bjork, Lindley and Little	12/10/08
Tamme Bishop	J. E. Stover & Associates Inc.	12/19/08
Tonya K. Hammond	Snowcap Coal Company, Inc.	12/19/08
Jim Stover	J. E. Stover & Associates, Inc.	12/19/08
Corey Heaps	Rhino Energy LLC	12/29/08
Chris N. Moravec	Rhino Energy LLC	12/30/08
Dave Zatezalo	Rhino Energy LLC	12/30/08
Nicholas R. Glancy	Rhino Energy LLC	12/30/08
Joe Reynolds	Western Pump and Dredge	1/6/09
Wayne P. Bankert	Laramie Energy LLC	1/6/09
	Lawyers for the Union Telephone Company	1/8/09
April Schultz	Rhino Energy, McClane Canyon Mining LLC	1/8/09
Randy Swiney	Rhino Energy, McClane Canyon Mining LLC	1/8/09
Rex A. Tippetts	Grand Junction Regional Airport	1/8/09

**Table D-1 (cont'd)**  
**Commentors Who Submitted Written Comments during the Scoping Period**

<b>Commentor Name</b>	<b>Affiliation</b>	<b>Date Submitted</b>
Matthew A. Wurtzbacher	Puckett Land Company	1/9/09
Lee Fyock	Gunnison Energy Corporation, an Oxbow Corporation	1/9/09
J. Paul Matheny	Questar Exploration and Production Company	1/9/09
Mark W. Scanlon	Scanlon Coal GeoServices, LLC.	1/9/09
Kenneth G. Leis	Western Slope Colorado Oil and Gas Association	1/9/09
Kathy Hall	Western Slope Colorado Oil and Gas Association	1/9/09
John Williams	Gateway Canyons Land Development Company	1/9/09
<b>Local, State and Federal Government</b>		
Jo Carole Haxel,	Mesa County Department of Planning and Economic Development	1/7/09
Davis Farrar	Collbran Board of Trustees	1/9/09
David Thornton	City of Grand Junction	1/9/09
Nathan Boddy	Town of Palisade	1/9/09
Chris Muhr	Mesa County Air Quality Planning Committee	1/9/09
Rob Schoeber	City of Grand Junction Parks and Recreation	1/9/09
Collin Ewing	United States Fish and Wildlife Service	1/9/09
Connie Clementson	United States Department of Agriculture, Forest Service	1/9/09
US EPA Region 8	United States Environmental Protection Agency	1/9/09
Robert P. Billerbeck	Colorado Natural Areas Program	1/9/09
Ron D. Velarde	Colorado Division of Wildlife	1/9/09
Timothy G. Sarmo	Town of Palisade	1/22/09
Laurie M. Kardich	City of Grand Junction	1/30/09
<b>Individuals</b>		
David Farny		11/14/08
Jack C. Hamm		11/18/08
Marty Felix		11/22/08
Art Trenholme		11/22/08
Ron & Jill Coleman		11/22/08
Bob Auleb		11/24/08
Martin Schwantz		12/2/08
Maurice Wymore		12/3/08
Bennett Boeschenstein		12/5/08
Jim and Liz Robinson		12/10/08
Betsy Shade		12/10/08
Lo I and Won Yin		12/11/08
C. Robert Wells		12/11/08



**Table D-1 (cont'd)**  
**Commentors Who Submitted Written Comments during the Scoping Period**

Commentor Name	Affiliation	Date Submitted
Scott and Valerie Stillman		12/16/08
Thomas M. Berry		12/17/08
Joy M. Clymer		12/17/08
Nic Korte		12/21/08
Alice Newberry		12/22/08
Requests that name be withheld		12/23/08
Jeremy Graham		12/24/08
Jeff Stevens		12/27/08
Trent Brickey		12/27/08
Lauren Pierce		12/31/08
Kenneth R. Kemp		12/31/08
Marie McGowan		1/2/09
Steve Speidel		1/3/09
Tracey Rohde		1/3/09
Bambi Johnson		1/4/09
Mark Shimoda		1/4/09
Susan Justice		1/4/09
Merilee Shields		1/5/09
George Marions		1/5/09
Steve Chapel		1/5/09
Ralph Reed		1/5/09
Diane Barto		1/5/09
Kent Collier		1/5/09
Chris Dolejs		1/5/09
Janet Ellison		1/5/09
Dave Kisor		1/5/09
Larry J. John		1/5/09
Holly and Eugene Shelton		1/5/09
Dick Artley		1/6/09
Steve Gunderson		1/6/09
Lynn Hague		1/6/09
Jan and Gayla Kobialka		1/6/09
George and Francis Alderson		1/6/09
Lynn M. Ensley		1/6/09
Gary L. Abbott		1/7/09
Quentin Hoopes		1/7/09
Joshua Smith		1/7/09

**Table D-1 (cont'd)**  
**Commentors Who Submitted Written Comments during the Scoping Period**

<b>Commentor Name</b>	<b>Affiliation</b>	<b>Date Submitted</b>
Charles E. Gilliam		1/7/09
Jerry Smith		1/7/09
Wayne M. Brookshire		1/7/09
Jeff Bates		1/8/09
Jerry Bruck		1/8/09
Rodney Head		1/8/09
John and Ginny Krook		1/8/09
Dale Znamenacek		1/8/09
Anderson Burch		1/8/09
Mike Click		1/8/09
Stephen R. Lewis		1/8/09
Jessica Noble		1/8/09
Kyle Kohl		1/8/09
Anthony Carr		1/8/09
Wayne M. Brookshire, Jr.		1/8/09
requests that name be withheld		1/8/09
Richard White		1/8/09
Elisa Downing		1/8/09
Debra Roberts		1/8/09
Randall Jochim		1/8/09
Bill and Cheryl Conrod		1/9/09
Justin Gilbert		1/9/09
Tom McKenney		1/9/09
Eric Rechel		1/9/09
Tracey Rohde		1/9/09
Jay and Dori Van Loan		1/9/09
Bill Day		1/9/09
Rick Lavoie		1/9/09
Landon Monholland		1/9/09
Andrea Robinsong		1/9/09
Tracey Rohde		1/9/09
Joyce D Olson		1/9/09
Larry Kent		1/9/09
John Evans		1/9/09
Ron Lambeth		1/9/09
K. Denise Richardson		1/9/09
Andrew Harmon		1/9/09

**Table D-1 (cont'd)**  
**Commentors Who Submitted Written Comments during the Scoping Period**

Commentor Name	Affiliation	Date Submitted
Ryan J. Gaff		1/9/09
Dustin Dunning		1/9/09
Stella Garcia		1/9/09
Justin Scholes		1/9/09
Travis L. Robinson		1/9/09
James and Billie Kiger		1/9/09
<b>Non-Profit Organizations/ Citizen Groups</b>		
John Solomon	Western Colorado Trails Association	11/18/08
Vicki Felmlee	Orchard Mesa Neighbors in Action	1/5/09
	Western Slope ATV	1/6/09
Don Riggle	Colorado Off Highway Vehicle Coalition and Trails Preservation Alliance	1/7/09
Cheryl Day	Black Canyon Audubon Society	1/7/09
Victoria Gipson	Old Spanish Trail Association, North Branch, Grand Junction Chapter	1/7/09
Jerry Smith	Grand Mesa Jeep Club	1/7/09
Mary E. McCutchan	Colorado Mt. Club - West Slope Chapter	1/9/09
Jason Keith	The Access Fund	1/9/09
Eve Tallman	Western Colorado Climbers' Coalition	1/9/09
Kenneth J. Strom	Colorado Audubon	1/9/09
Cliff Koontz	Ride with Respect	1/9/09
Rob Bleiberg	Mesa Land Trust	1/9/09
Brian Hawthorne	Blue Ribbon Coalition	1/9/09
Roz McClellan	Rocky Mountain Recreation Initiative	1/9/09
Nada Culver	The Wilderness Society and others	1/9/09
Kate Graham	The Colorado Environmental Coalition and others	1/9/09
Megan Kram and Terri Schulz	The Nature Conservancy in Colorado	1/9/09
Sonja Chavez de Baca	Lower Gunnison Basin and Grand Valley Selenium Task Force	1/9/09
Pamela McGuirk	Old Spanish Trail Association	1/9/09

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# APPENDIX E

## REPRESENTATIVE SCOPING COMMENTS BY PLANNING ISSUE

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The BLM received 953 discrete comments during the GJFO scoping period. These comments were classified by RMP planning category and by planning issue. A selection of representative comments for each planning issue category, and for the general RMP process category, is included in this appendix. Comments reflecting the same concern or recommendation are represented by a single comment. In addition, some of the comments have been abbreviated from their original text, while other have been presented verbatim to preserve the intended message. Comment letters can be viewed in their entirety at the GJFO in Grand Junction, Colorado. Representative comments are included for the following planning issues:

Table E-1	Travel Management
Table E-2	Energy Development
Table E-3	Recreation Management
Table E-4	Lands and Realty / Community Growth and Expansion
Table E-5	Fish and Wildlife
Table E-6	Special Designation Areas
Table E-7	Wilderness Study Areas and Lands with Wilderness Characteristics
Table E-8	Water, Soil, and Riparian Areas
Table E-9	Special Status Species Management
Table E-10	Vegetation Management
Table E-11	Air Quality
Table E-12	Livestock Grazing

Table E-13	Cultural, Heritage, and Paleontological Resources and Native American Religious Concerns
Table E-14	Social and Economic Considerations
Table E-15	Public Health and Safety
Table E-16	Noise
Table E-17	Drought Management / Climate Change
Table E-18	RMP Process and Other General Comments

Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
User-created motorized tracks or routes should be presumptively excluded from designations in the RMP. These routes must be thoroughly analyzed to determine whether they comply with the requirements of the BLM's ORV regulations (43 CFR § 8342.1) and whether they serve an important purpose not served by other routes, such as reaching destinations within the Field Office, prior to being included in the travel network. Therefore, the BLM should use, as a baseline from which to begin an analysis and subsequent proposal, only the current baseline system of officially designated roads and motorized trails. Only from this perspective can the BLM and the public accurately determine the true scope of the changes being proposed.	X			
All routes should be closed unless signed as open. In the areas most prone to illegal cross country travel or driving on closed routes, there needs to be more enforcement. This applies especially to low semi desert habitat, which has many of our most vulnerable species.	X			
Travel on BLM lands in the Miracle Rock/Timber Ridge area should be limited to foot and horseback travel only. Public access to this area is currently limited to foot and horseback travel only because of access issues. Motorized access does exist off of several privately owned parcels. This limited access is primarily used during the hunting seasons, and the resulting unequal access opportunity can lead to conflicts with hunters. Resource abuse from the limited motorized access that currently exists can already be seen in the form of newly created ATV trails. While the vegetative community in this area is currently in good shape, much of the area is composed of fragile, sandy soils that are easily disturbed by off road use/abuse. The openness of much of the area makes it difficult to ensure recreational travel is confined to existing roads and trails.	X			
There are numerous routes and trails off the head of the John Brown Road that provide needless duplication and result in serious fragmentation.	X			
The travel plan should include trail and road connections to the neighboring Uncompahgre National Forest.	X			
The RMP will say that licensing issues affecting motor vehicles remains the responsibility of the State governments where each area is located.			X	
The RMP will require that designation decisions at the local level will determine the appropriate consideration of other Federal laws, such as issues relating to threatened or endangered species.		X		
The RMP will reject the notion that all areas should be closed to OHV recreation until such time as the implementation process is completed.	X			
The RMP will recognize that designations of roads, trails, and areas for motor vehicle use will not be permanent. Such designations could be revised depending upon environmental impacts, changes in public demand, route construction, and usage.	X			
The RMP will provide that actual designation of routes and areas shall be the responsibility of the local offices. In other words, BLM Supervisors and District Rangers will be making these determinations after receiving public input.		X		
The RMP will not suggest that a complete inventory of all roads and trails must be completed prior beginning the implementation/designations process.	X			

Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
The RMP will not require local officials to reconsider previous decisions designating existing areas, roads, and trails for motorized recreation. Such reconsideration is at the discretion of the local official after consultation with the public and user community.		X		
The RMP will determine that certain units or Ranger Districts will be able to complete the designation process earlier than other Districts and that prohibition on cross country travel will become effective at different Districts at different times.		X		
The RMP will define what constitutes a "Road" and a "Trail."	X			
The RMP will continue to encourage and rely on volunteer assistance for the construction, improvement, and maintenance of "primitive" roads and trails for motorized recreation.			X	
The RMP will confirm that the prohibition of motor vehicle use off of the designated system only goes into effect at the administrative unit or Ranger District once that unit or District has completed the designation process. Completion means having motor vehicle user maps identifying those areas so designated available to the general public.		X		
The RMP will allow the BLM to work with and train volunteers of organized OHV users to monitor and report unlawful uses of the public lands. BLM will train Volunteers in the proper and safe collection of evidence to have violators prosecuted.			X	
The RMP will allow the BLM to reconsider the status of "roadless area" designations. Areas with existing trails and roads should be reconsidered for reintroduction to "open to motorized vehicles" or "limited OHV use" status.		X		
The RMP will allow for commercial and non-commercial uses of designated routes and areas. Permits may be required for commercial use only.	X			
The RMP will address all forms of motor vehicle use and not just OHVs.	X			
The RMP will acknowledge that some user-created routes should be incorporated in the final designation process. However, such determinations should be made at the local level by officials with first-hand working knowledge of the area after working closely with local governments, users, and other interested parties.	X			
The prioritized list of implementation actions should include the rehabilitation of closed or illegal routes, mitigation of impacts from all types of use, the construction and installation of signs, monitoring, and enforcement.	X			
The BLM should use density of roads, expressed as "miles of road per square mile" (rd mi/mi <sup>2</sup> ) as an objective, quantified measure of development.		X		
The BLM should consider whether to formally acknowledge and incorporate user created routes into the RMP. If trails are incorporated, the BLM should determine what level of trail development and maintenance is appropriate or required, what materials should be used, and what level of maintenance will be regularly needed, if any. In maintaining these trails, the BLM should consider working with the local climbing community and Access Fund to help build effective trails using volunteers for high use climbing and bouldering areas.	X			



Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
The area just south of Unaweep Canyon (along the Divide Road and its various side roads) is currently open to off-road travel. Climbers regularly camp in this area and have in the past been disturbed by unmanaged off-road vehicles. Accordingly, the GJFO should limit this area to limited to designated routes.	X			
Implement seasonal closures and/or closures of secondary roads of Sunnyside (V road) for protection of wildlife habitat. Oil and gas exploration and production has provided major road improvements resulting in improved vehicular access year round. This increase in vehicular traffic, particularly in the winter month, has impacted wintering wildlife, including mule deer, Bighorn sheep, and elk. Seasonal closures or removal of various secondary roads would greatly benefit the habitat for wildlife.	X			
Travel on BLM lands on Snyder Flats should be restricted to foot and horseback only. Currently, public access to Snyder Flats is very difficult and is limited to foot and horseback only from the Unaweep Canyon because of steep terrain. There is a network of roads existing on Snyder Flats that are accessed from adjacent private lands. Unequal access opportunity to the area can result in hunter conflict, as hunters that have just experienced a very difficult climb to reach Snyder Flats have their hunt interrupted by somebody road-hunting out of their pickup.	X			
The Sheep Creek Road should be restored to allow for full-sized vehicles. This is one of the few routes that provides a way from Glade Park to Gateway.	X			
Travel on BLM lands south of Seiber Canyon should be restricted to foot and horseback only. Current public access is by foot and horseback only, but motorized access does exist from adjacent private lands. Unequal access opportunity to the area can result in hunter conflict.	X			
Recreation and travel plans should discuss the implications of various route densities on ecological health, and the issue of route density should be carefully studied when any user-created route is being considered for addition to the existing system. The Colorado Mountain Club, having done its own research on route densities and related impacts to natural resource health, can provide literature references on route density impacts to wildlife. In general, densities over 1 mile of road per square mile are considered deleterious to predators and big game species. In a recent study performed on route density impact to wildlife, it was concluded that “habitat effectiveness can be expected to decline by at least 25 percent with a density of 1 mile of road per square mile and by at least 50 percent with two miles of road per square mile.....As road densities increased to five to six miles per square mile, elk use declined to less than 25 percent of potential.” A similar study found that hunter success almost doubled when open road density was reduced from 2.54 km/km <sup>2</sup> to 0.56 km/km <sup>2</sup> . Additionally, road closures can improve the animals’ performance, increase the amount of effective habitat, increase hunting opportunities, decrease damage to crops, improve diet quality, increase hunter satisfaction, and decrease vulnerability of elk during the hunting season.	X			
Of specific concern are the impacts of roads and trails, as well as a reduction in the number and size of roadless core areas and an increase in edge habitat created by roads and trails, have on animal and plant wildlife. These impacts include but are not limited to mortality from collisions, modification of animal behavior, disruption of the physical environment, alteration of the chemical environment,	X			

Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
spread of exotic species, and changes in human use of the lands and water. Specific examples include habitat loss and fragmentation; diminished animal use of habitats because of noise, dust emissions, and the presence of humans; loss of forage for herbivores; interference with wildlife life history functions (for example, courtship, nesting, and migration); spread of non-native species carried by vehicles and along disturbed corridors created by road establishment and maintenance; increased poaching or unethical hunting practices; increased recreation by off-road vehicles; and degradation of aquatic habitats. Road access also increases vandalism, theft, and damage to archeological and cultural sites. To mitigate against these impacts we recommend the BLM consider closing or converting to less-intense use, routes that intersect areas that are particularly important for conservation of biodiversity, including Colorado Natural Heritage Program (CNHP) Potential Conservation Areas and Networks of Conservation Areas, Colorado Natural Areas Program Natural Areas, BLM Outstanding Natural Areas and Research Natural Areas, and The Nature Conservancy Southern Rockies Eco-regional Plan Portfolio Sites, and rare or endangered natural communities tracked by the Colorado Natural Heritage Program. We also encourage BLM to consider closing or converting to less-intense use, routes that intersect and have the potential to impact important habitat for special status species, including BLM and FS sensitive species, CO state species of special concern, Endangered Species Act listed species, and rare and/or endangered species tracked by the Colorado Natural Heritage Program.				
BLM should use the information provided by The Wilderness Society to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Grand Junction RMP.	X			
The RMP should eliminate some redundant routes and direct most motorized users away from some of the most important habitat areas.	X			
Rabbit Valley - The RMP should allow for additional difficult trails to be constructed for 4x4s in the Rabbit Valley area.				X
Rabbit Valley - The Kokopelli trails and Rabbit Valley are great areas for OHV vehicles and would be nearly unreachable without motorized access.				X
Rabbit Valley - Limit OHV routes to the absolute minimum, with no added routes. Redundant routes should be closed.				X
Prioritize implementation of existing plans.	X			
BRC encourages the agency not to “landlock” trails or areas. Long-term planning that allows, or at least does not restrict, connecting recreation opportunities within the GJFO and beyond should be considered. Popular routes exist between Loma and Moab, between Fruita and De Beque, and between Clifton and Delat and are becoming quite popular. Utilizing a combination of existing and proposed single-track and double-track, the RMP should aim to connect Grand Junction with the following destinations: Rangely; Utah north of Colorado River (including north of I-70); Utah south of Colorado River (including Granite Creek); Uruvan; and De Beque (via the Book Cliffs).	X			
I want to suggest that no existing trails or roads be closed at this time to allow current and future generations to experience their public lands in the form of recreation that they chose to explore them with.	X			
Add new trails to existing areas and new areas for creating trails if possible.	X			

Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
Would prefer if closure of trails is deemed necessary that local clubs have input (i.e., Western Slope ATV club, Grand Mesa Jeep Club, biking and hiking clubs).	X			
We briefly polled a few of our members in the Grand Junction area, and they were very specific: More Single Track (motorized and mountain bike)!! More ATV trails!! More 4x4 trails!! More Rock Crawling Trails!!	X			
In regards to the density of trail users, we suggest that there should be some separation of trails – for example, motorized (open to OHV only), motorized and mechanized (open to OHV and mountain bike), mechanized (open only to mountain bike), mechanized and foot (open to mountain bike and foot travel), foot only (open only to foot travel), and lastly equestrian and foot trails.	X			
Travel Management issues related to Oil and Gas need to be analyzed. The new roads and trails within the management area need to be surveyed and analyzed for purpose and need.	X			
Not only should the BLM consider road density as it lays out its travel system, the agency should also ensure that routes designated in the travel system are appropriate for the specified type of travel. Specifically, they should be engineered so that: a) excessive erosion will not occur, b) water drainage is accommodated, c) critical ecological and cultural areas are avoided, and d) conflicts among other visitors are avoided. In riparian areas, routes should be designed to avoid stream corridors as much as possible. Where crossings are unavoidable, routes should be designed to cross streams at right angles rather than run parallel to streams, and hardening of the stream banks should be considered.	X			
North Desert/Book Cliffs: A network of single-track trails exists along the Utah border west of Prairie Canyon Rd. I want the GJFO to include these trails in the designated route system and to work with the Moab FO in an effort to designate the portion of the network that is in their jurisdiction.	X			
North Desert/Book Cliffs: Legal motorized / mountain bike access from the Highline Lake campgrounds is not presently possible. I would like to have GJFO work co-operatively with Colorado State Parks to remedy this situation. Only a short section of a route that already exists needs to be designated as a trail to accomplish this goal.	X			
Montrose has a lot of nice trails as well and could use some more options for people visiting and wanting to find some new areas to explore and drive their rigs on. There are quite a few loops and alternate trails in Montrose that could be opened up in addition to all the current designated trails.				X
Maps: RMP will make “motor vehicle use maps” available to the general public and will endeavor to post this same information on the local BLM website.			X	
BLM should identify both existing restrictions on motorized access and other areas that can be damaged by motorized use on all maps used in travel planning.	X			
I would also like to see your idea of loop trails in areas where in/out congestion happens. I believe this would create a more secluded outdoor experience and make some areas safer as well. This idea would work really well for new mountain bike trails as well as rock	X			

Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
crawling areas that need more difficult trails and loops to spread the use out and have more options for a given area. The Bangs Canyon area comes to mind in regards to having some more hard trails and loops to drive on.				
It is unreasonable to expect the GJFO to devote the necessary resources on an on-going basis to maintain a signed and patrolled designated route system on over 1,000,000 acres for an indefinite period of time. The public is better served to have GJFO prioritize its resources in high use areas (SRMAs) and leave the remaining land to custodial management as instructed in the planning handbook.	X			
In addition, it is important to adopt or create a system of single-track trails to enhance the quality of trail experience to coincide with the destination quality of the Gateway region.	X			
Impact Mitigation Associated with Development of Public Lands - Management and leasing of public lands associated with extraction of resources on BLM land that has off-site impacts to roads and other public infrastructure should consider impact mitigation. Mitigation actions could include road impact fees, grants, and other financial compensation for disproportionate costs that ultimately are borne by the local population. Recreation and hunting activities on public lands have positive economic impacts to a local community. Some of these benefits can be further enhanced through public management actions such as educational waysides. Educational/informational waysides inform hunters/recreationalists about the Town of Collbran and services offered that benefit these users of public lands. Information kiosks could be provided in the Town of Collbran to educate the user population about the surrounding public lands. A mutual benefit could be derived from management practices that provide information to users of the resource.			X	
If all trails are to be designated, then we need to know that some expansion is possible for the progression of certain pursuits and uses. A policy for a trail closed needs to have a trail opened to replace it. We cannot afford to lose any more of our recreation areas with the amount of people out using these resources. We need more areas where we can all enjoy our pursuits.	X			
I would like to see an OHV Travel Plan included in the RMP.	X			
I recommend that the mesa tops and access to the mesa tops be allocated to shared use primitive motorized recreation. The existing network of routes needs to be designated as shared use for all visitors. This does not include the areas disturbed by previous exploratory mining activity. The routes, however, are a important recreational resource.	X			
I love to hike. Would like to also have more hiking trails designated as hiking or biking only. Enjoy wildlife and wildflowers native to our part of this wonderful country.	X			
I would like to see the process for developing and creating new trails become more streamlined.	X			
Grand Valley Open Area: The Grand Valley Open Area extends east from 27 ¼ Road to Mt. Garfield. This area is highly valued by hundreds of thousands of local visitors, and thousands more out-of-region and out-of-state visitors during the winter months. It functions well for its intended purpose. We want to see that area continue as it is presently designated, which we understand to be open to cross-country travel east of 27 ¼ Road, and limited to existing routes west of 27 ¼ Road. More signs to inform the visitors that this is the rule would be appreciated. The	X			

<b>Table E-1 Representative Comments for Travel Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
reason we ask for that is because the installation of the two kiosks in the last three years has helped to reduce the cross-country travel on the west side of 27 ¼ Road. This shows that people will follow the rules when they know what the rules are. We would also like to point out that the signs are not vandalized. An even more effective improvement would be a fence on the west side of 27 ¼ Road, with clearly defined entry points. At the entry points, we would like signs that tell people what the rules are.				
De Beque Area- close in to the west of town- should have ATV Routes 20-40 miles in length. Almost everyone in town owns an ATV and they are legal in town. Annul ATV poker ride west of town.	X			
The area south and west of De Beque: A system of single-track trails connects many of the gas industry roads with quality trail opportunities and access to the washes and slick rock. I hope to have these trails designated as single-track OHV and mountain bike trails. Little infrastructure is necessary due to the present level of use. It is foreseeable that additional recreation pressure and the growth of the town of De Beque, over the life of the RMP, may have impacts on the area. An improved partnership with the town and the energy companies would be a feasible source of support for trail and infrastructure development in the future.	X			
North Desert (Zone 6) - Reduce ORV routes to the absolute minimum, and close the many redundant criss-crossing routes.	X			
No new roads anywhere.	X			
Cactus Park: The area from Cactus Park south including Dry Creek Travel Management Plan is becoming a high impact area. The roads, routes, and double track trails must be kept open to be shared by all.	X			
Cactus Park is adjacent to the Bangs Canyon SRMA, the Dominguez WSA, and the Uncompahgre NF. Designation of the existing through routes and the establishment of a developed campground will go a long way to reduce the impacts and retain the recreation opportunities.	X			
Billings and 21 Rd: People come from all over the country to run their rigs on Billings and 21 Rd and GJ needs more trails and areas like this.	X			
Bangs Canyon: I think some trails like the Tabaguache in Bangs Canyon and Sheep Creek Rd in the Dolores Triangle could be repaired and reopened. The Tabaguache trail could be extended all the way from Bangs Canyon to UnawEEP Canyon to make a complete trail.	X			
Bangs Canyon -Limit ORV routes to the absolute minimum, with no added routes. Close routes in riparian habitat and all redundant routes.	X			
Bangs Canyon Area needs more connecting ATV trails to disperse the heavy weekend use. An ATV trail from the Tabeguache Trail though the Hells Hole and Rough Canyon area to the Gunnison River would make another great loop. This trail could be shared by ATVs, dirt bikes, mountain bikes, equestrians, and side by sides.	X			
A Shortage of ATV trails on BLM lands. Need more established/contraction in east end of Rabbit Valley, Bangs Canyon, De Beque, Cactus Park, and Glade Park.	X			

Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
As open areas become limited, a few additional trail systems warrant designation. Many primitive double-tracks northeast of Highway 141 between Uravan and Gateway make great OHV loops. Existing single-track southwest of De Beque should be designated for motorcycling and bicycling. The mountain biking area south of Loma could be enhanced by constructing a few more bicycle-specific routes. In the North Fruita Desert, the RMP ought to construct or sanction a few downhill routes to provide for that specialization.	X			
Adequate signage is often lacking or altogether absent. This results in considerable confusion, duplicative and unnecessary user-created trails, and further impacts on the resource. Signage should be established and maintained to direct users to trailheads in highly used areas such as the Palisades and upper Dominguez Canyon (from Cactus Park). Better signage is also needed in the vicinity of Pyramid Rock. Informational kiosks need to be strategically provided in these areas alerting users not only to restrictions, but to the sensitivity of the area. In numerous cases, there is an absence of signage in areas where ready confusion exists between public and private lands.			X	
21 Road: North Desert/Book Cliffs: The extension of 21 Road, Hunter Canyon, is a popular area for rock crawling. The fact that it changes each year with the rock obstacles moving about as a result of the seasonal flows is an added attraction. Suitable access agreement should be made between GJFO and the legitimate rights of the private in-holder.	X			
North Desert/Book Cliffs: Moving east, the area between 21 Road and 27 ¼ Road should remain an ERMA, and custodial management applied to the existing trail and road network.	X			
21 Road: Hunter Canyon should also be expanded to offer more access to motorized travel.	X			
Hunter Canyon (21 Road): Bar OHVs from the proposed wilderness area, and close the OHV routes that run in the drainage bottom or in riparian habitat. This area is popular with hikers, horseback riders, and mountain bikers, and it is known for its wildlife. OHV traffic should be reduced in favor of these quiet uses.	X			
16 Road: I would also ask that a trail be considered connecting the Book Cliffs (16 Road) to one of the trails leading to De Beque. We spent part of the summer trying to find a route connecting the two areas. If one already exists, I have been unable to find it and maybe I need a better map.	X			
16 Road Area: route to Barrel Springs should be official ATV trail.	X			
The RMP should continue to allow open travel in the desert area north of I-70 and east of the airport.	X			
Make decisions to close any trail based on conditions specific to that trail/road and to not base closure decisions on ideology or what could be perceived as arbitrary rulings (such as the fact that an existing and long established road/trail not making it on the inventory list).	X			
Install additional fencing and/or placement of large barrier rocks to protect the integrity of the trail and to better prevent the motor vehicle trespassing and abuse that has been an issue [for the Old Spanish Trail].	X			
Snowmobiles should be exempted from any cross-country travel restrictions.	X			

<b>Table E-1 Representative Comments for Travel Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
Off-highway vehicle owners don't have a God-given right or entitlement to tear up precious public land. OHVs, if allowed to operate at all, should be carefully restricted to very small sacrifice zones and specifically marked routes that clearly have no other values. Restricting motorized access is not "locking up" an area; people should get off their fat butts and walk or ride a horse. Their health would be improved by the experience.	X			
Significance criteria such as "loops," "level or range of difficulty," "scenic quality," "destinations," "connector routes," "point-to-point routes," or other similar qualities OHV users appreciate in trails should be considered by the Planning Team.	X			
<p>Key principles of travel planning:</p> <p>(1) Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective. (2) Prior to conducting an inventory or designation of routes, BLM should assess the present resources, requirements for protection, and which uses for recreation and development are compatible with these resources, requirements and other users. (3) BLM should use a legal definition of "road" when designating routes. (4) BLM's consideration of ORV use should take into account its potential damage to resources and other uses, including exclusion of other users. (5) Where BLM presents a baseline travel system, it must present route maps in a responsible manner that does not legitimize illegally created routes. (6) BLM should include a detailed closure and restoration schedule in the plan. (7) BLM should include and implement a monitoring plan. (8) BLM should include and implement education and outreach in the plan.</p> <p>Furthermore, Colorado IM No. CO-2007-020 instructs Field Offices to select roads and trails based on comprehensive travel management goals: Design a travel system with RMP and transportation network goals in mind rather than just choosing from inherited roads, primitive roads, and trails. Instead of a decision-making process to only decide which individual routes should be closed or left open, design a travel system with a desired goal of sustainable routes that meet patrons' needs (i.e., loops) and varying levels of difficulty. Also, consider a broader range of management options that include reroutes, reconstruction or new construction, as well as closures. The Wilderness Society and the Colorado Mountain Club have developed a template for conducting travel management planning, including a detailed discussion of these key principles of travel planning, which we have attached and recommend that the BLM incorporate into the RMPs as the process for further planning.</p>	X			
As the human population increases, the recreational use of BLM lands also increases. Travel Management is an important part of protecting wildlife species, while allowing for recreational activities. ATV use was minimal when the 1987 RMP was written. Currently most of the field office's lands are open on "existing routes" and a BLM Law Enforcement Ranger explained that this means that if he contacted two people driving cross country across the BLM, he could cite the first vehicle, but not the second because it was following an existing route. A lot of the BLM lands in Mesa County are riddled with roads, and the number of roads increases every year. It may be necessary to have a system where all of the lands are closed unless signed open (travel restricted to designated, numbered routes), with	X			

Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
the possible exception being the ATV areas near 27 1/4 Road and 34 & C. The proper management of recreational travel on BLM lands is critical. Because of its close proximity to Grand Junction, the abundant wildlife, and the fragile soils/ecosystems that are found across BLM lands, the potential for resource abuse is great. During the fall of the year, BLM lands provide valuable hunting opportunities for both resident and non-resident hunters. As time goes on, off-road technology improves, and the Grand Junction area's population continues to grow, recreational pressure on public lands in the area continues to increase. This increase in pressure has direct negative impacts on wildlife habitat, ranging from outright loss and fragmentation of habitat from roads and trails to a shift in use and migration patterns of wildlife in areas because of increased human presence. However, proper planning for recreational travel management in this area will allow for a diversity of recreational opportunities and good wildlife habitat that can be enjoyed for generations.				
Please protect our valuable BLM desert land and keep it closed to motorized traffic.	X			
Evaluate regional demand for motorized and mountain bike trail. For Gateway this should be done in the context of the many motorized and mechanized opportunities in the surrounding region, including the Uncompahgre and Grand Mesa motorized and mechanized trail systems, Fruita, and other planned and existing trail opportunities. Considering how many other trail opportunities exist regionally, the BLM will need to provide compelling evidence that more motorized and mountain bike trails are needed in Gateway.	X			
Although the amount of designated OHV opportunities should increase, we understand that non-designated OHV access will likely decrease by this RMP. The resulting plan could easily approach a "tipping point" of restrictions. In other words, the impacts of concentrated use and noncompliance would escalate past this point. Thus, RWR requests that the net loss of access be documented by stating the acreage of areas currently open to OHV use, plus areas limited to existing routes that were never inventoried. Citing this cumulative loss of OHV access and its potential ramifications, the RMP should then set forth to maintain the net access that's established by the new area and route designations.	X			
BRC emphasizes the need to provide for trails motorcycle and 4x4 rock crawling opportunities in the new RMP. Trails motorcycle and rock crawling is very popular in the area. There are many areas in the GJFO where providing this type of use can be provided in a sustainable and manageable manner.	X			
Clearly, there is an increasing demand for OHV recreation opportunities on public lands and National Forests. BLM's OHV Strategy states, "Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management (BLM) has increased substantially in recent years. ... Some of [the factors contributing to growing OHV popularity] are: greater public interest in unconfined outdoor recreational opportunities; rising disposable income; advances in vehicle technology; the rapid growth of the West's cities and suburbs; and a population with an increasing median age with changing outdoor recreational interests. This [growing OHV] popularity is evidenced by the fact that recreational enthusiasts are buying OHVs at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so a first-time buyers." National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, US Department of Interior Bureau of Land Management, January 21, 2001, p. 1-2. "[BLM's OHV] Strategy recognizes, as does policy outlined	X			



Table E-1 Representative Comments for Travel Management	Planning Classification <sup>1</sup>			
	A	B	C	D
in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an 'acceptable use of public land wherever it is compatible with established resource management objectives.' As established by the Federal Land Policy and Management Act of 1976, the BLM is required to manage public lands on the basis of multiple use and sustained yield, while protecting natural values. ... Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands." National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, US Department of Interior Bureau of Land Management, January 21, 2001, p. 2-3.				
I am an avid fan of mountain biking and hope that your plans for the western Colorado-eastern Utah area will consider interests that I and other mountain bikers have in that region.	X			
Road maintenance to these shooting areas are a concern. I am often tempted to bring my own machinery in at night and condition the roads.	X			
There are areas that have long been used for cross-country OHV activities with no adverse environmental impacts. Chief among these are: some "play areas," sand dunes, mancos shale hill climb areas, and other areas with little or no vegetation. Some open areas are recognized for their high OHV popularity and should kept available for those who value this type of recreation. Examples of valued "open" designated areas are staging areas that provide recreationists to gather before and after traveling on OHV trails. "Tot Lots" where children and young adults can recreation with their friends in an area close to parental supervision are highly valued. The Planning Team should look for management alternatives that provide for mitigation and management of these staging areas instead of closure.	X			
If there are special designation areas, they should not be detrimental to motorized recreation. In that case, we would need to establish ATV emphasis areas also.	X			
Off-road vehicles: ORVs should be barred from WSAs, proposed wilderness areas, and all riparian wildlife habitat. The plan should reduce ORV travel routes to a sustainable system by closing unauthorized, user-created routes. The plan must tell what BLM will do to enforce ORV regulations.	X			
We have had the opportunity to meet many ATV users enjoying their public lands. Most of the older or disabled persons and families with children who drive around on the roads, tracks, or trails can only get out and enjoy the BLM lands because they can use an ATV. Without the use of an ATV, the public lands would be closed to many people. The roads, trails, and tracks presently open to ATV use need to stay open for the public's enjoyment. However, tracks and trails that are in environmentally sensitive areas should be reviewed to determine if they should be closed.	X			
Off Road Vehicle Management CNAP recommends that the following ACECs/Natural Areas be designated as 'Closed' to motorized use: 1. Gateway Palisade (portions included in the Outstanding Natural Area) 2. Pyramid Rock 3. Rough Canyon	X			

<b>Table E-1 Representative Comments for Travel Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>4. UnawEEP Seep</p> <p>The closure of these areas to motorized use would ensure that the sensitive and rare features that occur will not be compromised by primary and secondary impacts (e.g., dust) from motorized vehicles. For the areas directly adjacent to the four ACECs mentioned above, as well as the four remaining ACECs/Natural Areas (Badger Wash, Fruita Paleo, Gunnison Gravels and Rabbit Valley), CNAP recommends a 'Limited to Designated Roads' ORV designation. As part of this process, CNAP recommends that an implementation plan be prepared that incorporates open road designations for the areas indicated.</p>				

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

Table E-2 Representative Comments for Energy Development	Planning Classification <sup>1</sup>			
	A	B	C	D
CDOW also strongly encourages no leasing of minerals under CDOW State Wildlife Areas. These properties were purchased because they either protect core habitats, or provide unique opportunities for wildlife conservation. Oil and gas development is generally incompatible with wildlife area management goals.	X			
Regarding uranium, oil, and natural gas, exploration in western Colorado (and elsewhere, for that matter) should be postponed until after the Obama Administration has identified its priorities for energy infrastructure improvements. It may very well be that the need for nuclear and fossil fuels will be significantly curtailed in the retooling of the US's energy supply systems. I sincerely hope you will consider the possible changes in the country's long-term energy needs before granting ecology-damaging exploration for what might be unnecessary energy sources.	X			
As a retired Forest Service land management planner from the Nez Perce National Forest in Idaho, I am well aware of the massive long-term harm that mining and oil/natural gas exploration can have on the public land. I have seen it with my own eyes. The miners all know the Mining Law of 1872 will be rescinded by the new Democratically controlled congress. This will be retroactive, so these miners will extract minerals as quickly as possible with little care being taken to protect the ecosystem. Even oil/natural gas exploration should be prohibited. The exploration process plunders the public land enough. If they find anything, the actual oil/natural gas extraction brings new roads, communities for the worker's families, and airfields. These are all things government land management agencies "forget" to analyze ... until it is too late. Please drop this insane idea, or I'll contact my pro-bono attorney. I own these lands and pay you to take care of them .... but not for corporations to increase their profit.	X			
As part of the process to designate West-wide Energy Corridors mandated by the Energy Policy Act of 2005, the Department of Energy's Draft Programmatic Environmental Impact Statement (PEIS) proposes the designation of two energy corridors for pipelines and powerlines through the Grand Junction Field Office. Especially of note is corridor 132-136, which is proposed to have a width of 21,120 to 26,400 feet. This is more than six times the default width of the proposed West-wide energy corridors, and the additional width is due to the existing management plan for the Grand Junction Resource Area. This corridor would have significant and lasting impacts to the area. Public comments on the Draft PEIS, attendees at public meetings held by the Department of Energy and cooperating agencies, and Congressmen, utility companies, renewable energy experts, and representatives from state and local governments participating in an oversight hearing held by the House Natural Resources Committee, Subcommittee on National Parks, Forests, and Public Lands and Subcommittee on Energy and Minerals all voiced major concerns about the corridor designation process. These concerns included: lack of adequate consultation with Native American tribes, state and local governments and communities, and local citizens; of access for renewable energy transmission; failure to analyze the opportunity to reduce transmission need and the need to designate new corridors with increased efficiency, distributed generation, and new technologies; lack of analysis of cumulative impacts; failure to analyze impacts to non-federal lands; and inadequate protection for special places, protected lands, wildlife habitat, cultural resources, and recreation	X			

Table E-2 Representative Comments for Energy Development	Planning Classification <sup>1</sup>			
	A	B	C	D
opportunities. During the RMP revision, BLM should evaluate potential impacts from the proposed corridor and, if it is found to be compatible with adequate resource management, then BLM should specify a smaller width for the corridor. Recommendation: To ensure a sustainable and reliable transmission infrastructure while limiting negative impacts, BLM should designate corridor locations and widths that are based on BLM's local expertise, appropriately account for concerns of local communities, and protect field office resources.				
I think it is vital that we be cautious and careful before any type of uranium development occurs. Please make certain that uranium development, such as mining, milling and all transport, does not start until a thorough programmatic analysis of the short and long term impacts of this activity is conducted.	X			
The CDOW recommends that a threshold for mitigation be developed regarding oil and gas operations within the planning area. There is a need to fully assess and forecast impacts from energy development and determine mitigation measures to offset impacts. Impacts are also likely to occur at a greater rate due to greater down-hole densities, and thus greater surface densities. By mandating a threshold such as four pads per section for mitigation, operators would be more likely to utilize BMPs and greater surface spacing. This threshold will be crucial for future management of operations with greater down-hole densities and leases that lack the needed stipulations for habitat protection.	X			
People moving here just to work the oil rigs and dig dig dig have not intention other than making money and trampling over Colorado's historical treasures, just to rape. Collect and realize the homegrown status of the western slope of the Colorado Rockies has been bought out be evil, greed and lack of understanding of our precious god-given land-air-water. What about the delicious trout in our streams.				X
CDOW also encourages the planning process, to consider utility of concepts such as: Establishment of rigorous reclamation monitoring and assessment programs.			X	
CDOW also encourages the planning process, to consider utility of concepts such as: Increased monitoring and enforcement of regulations, approval conditions and policies.	X			
A broad use of mitigation options that consider site-specific conditions, future development technologies, advances in best practices and integrated strategies offer a significant opportunity for less impact and improved mitigation over specific land use stipulations and prescriptive mitigation measures.	X			
Please include extensive allowable natural gas development in the preferred alternative of the RMP.	X			
Significant portions of the Grand Junction RMP planning area will likely remain open to oil and gas development. As discussed with respect to the many other values of the lands within the planning area, many of these lands should not be open to leasing and others require non-waivable lease stipulations to protect their resources, such as wildlife habitat, water quality and wilderness characteristics. It is vital that the RMP require the use of best management practices (BMPs) for oil and gas exploration and development, which can drastically reduce the impacts of oil and gas development on the other natural resources of the public lands.	X			

Table E-2 Representative Comments for Energy Development	Planning Classification <sup>1</sup>			
	A	B	C	D
BLM's guidance requires consideration of BMPs for oil and gas development. BLM's Instruction Memorandum 2004-194 directs consideration of BMPs and both the IM and the recently updated Gold Book provide examples of BMPs that can be applied to both new and existing leases, in order to limit the damage from oil and gas development. It is critical that the RMPs consider and make BMPs mandatory in order to comply with BLM's guidance and obligations to protect the many natural values of these lands. Recommendations: The Grand Junction RMP must identify BMPs and make them mandatory, especially in sensitive areas. BMPs should include: Phased or strategic development - in terms of timing (developing one area, then restoring before moving to another), location (such as staying out of big game corridors), limiting amount of equipment in use at any given time, limiting amount of surface disturbance on a lease at any given time and requiring successful restoration before permitting additional disturbance; directional drilling; clustered drilling; closed loop drilling; interim reclamation; restoration standards; unitization; and increased bonding.				
America needs to develop all of its natural resources, including gas, uranium, and all other metallic and nonmetallic resources needed in order to strive to be energy independent and in order to provide all other raw materials necessary to support our civilization. There should be no unreasonable regulation or time consuming policies to hinder this effort.		X		
One particular area I hope the RMP studies is the economic importance of reliable and affordable energy. Most legislators and regulators understand the importance of having energy sources that all people can afford. Despite lower energy prices at the pump, just in the past few weeks Coloradoans received notice that our energy bills were slated to increase yet again. Further double-digit increases in utility bills and home heating costs are just around the corner and those increases are going to hurt tens of millions of American and Coloradoan families and further depress our struggling economy. Colorado State Senator Bill Cadman recently made public statements that "if we want 'to keep the lights on' we are going to have to ....increase our production of all forms of American energy." America is at a critical juncture regarding energy security. In order to ensure our economic well being, we are going to need to develop all of our assets. In Western Colorado, we are blessed with many types of energy: coal, natural gas, oil shale, biofuels, oil shale, solar, etc. All of these types of energy need to be pursued on public lands and should be a top priority. The RMP must take local and national energy affordability into consideration. This is one of the most important issues facing us today.	X			
The BLM should not make blanket, inflexible stipulations related to development. Rather, mitigations should be sought at the site-specific level. Different basins and even individual well-sites have their own unique characteristics which must be considered.	X			
In areas where it is found that critical wildlife habitat would be negatively impacted by energy development, the BLM should encourage energy operators to engage in land exchanges to future protect wildlife while maximizing large-scale energy development.	X			
Rhino Energy currently operates the McClane Canyon Mine near Lorna. The McClane Canyon Mine produces 300,000 tons of coal per year. The high-quality coal is shipped by truck to the Cameo Power Plant in Mesa County. Rhino is undergoing the NEPA permitting process for the Red Cliff Mine through the BLM GJFO. The Red Cliff Mine is expected to produce six (6) million tons of high quality, low	X			

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	A	B	C	D
sulfur, EPA-compliant coal per year with a heating value of 11,000 to 11,500 Btu. As the BLM GJFO begins its revision of the 1987 RMP, Rhino Energy asks that the BLM continue to identify the same 390,000 acres of the Book Cliffs' coal reserves as in the 1987 RMP for further coal leasing and ensure other management issues including but not limited to recreation, visual resources, and wildlife, do not interfere with coal development in the Book Cliffs. This also means that you must ensure that coal operators can lease and permit the necessary associated facility and transmission infrastructure needed for coal mining operations.				
Critical infrastructure that must be planned for includes but is not limited to mining operations, oil and gas fields, transportation corridors and pipelines, processing and refining facilities, electricity transmission, and other energy related facilities. We respectfully request that your plan not place onerous restrictions on future energy development and the corridors that will be necessary to deliver products to market.	X			
Finally, BLM needs to find ways to expedite both pipeline and transmission line completion to ensure traditional and unconventional energy can get to market, reduce our energy dependence and diversify our energy portfolio.	X			
It is also important that the BLM slow down the process of leasing federal lands [for oil and gas] and put more into analyzing the impacts to wildlife, water and the communities that are impacted by drilling.	X			
Change the view shed classification of the area in the Book Cliffs from III to IV.	X			
In an effort to sustain a healthy economy in Mesa County, I urge the BLM to continue to allow for the development of the natural resources within the region. Mesa County has managed to somewhat stay immune from the crippling effects caused by the recession due to the development of gas reserves to the east. Natural resource development is the backbone of the economy in Mesa County and is critical to protecting the way of life in this area, In this new Resource Management Plan that will guide the way we use and utilize our public lands for the next two decades, energy development needs to be a priority. Please continue to allow for the development of these natural resources.	X			
Long-term goals desired by Gateway Canyons and John Hendricks are: Establishment of appropriate rules and regulations concerning the use of public land by holders of mineral leases so that mineral exploration and extraction activity do not adversely affect a sustainable recreation economy. We ask that the BLM take a hard look at the its leasing directions of the past and provide for a recognition of other values (recreational, cultural, ecological) in its leasing policy. Restriction on surface disturbance and visual intrusion may be a necessary part of the policy.	X			

<b>Table E-2 Representative Comments for Energy Development</b>	<b>Planning Classification<sup>1</sup></b>			
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When you overlay the drilling leases with the deer and elk critical winter range you find a large area of winter range that is currently or will be effected by drilling. It is time that the BLM work with DOW to identify the most critical areas and start to freshen habitat in those areas to offset the displacement of big game animals by human actives associated with drilling. Research in Pinedale WY shows a 40% decline in deer herds due to drilling. This kind of loss to deer or elk in the Grand Jct. area is unacceptable. Under the BLM multiple use concept, big game management should take a priority as high as drilling. In Mesa County alone, hunting and fishing have a 25 million dollar annual impact on our economy. Also, BLM needs to monitor water quality on the small streams that contain endangered cutthroat trout. Many of these waters are in areas with high drilling density.	X			
The GJFO's scoping documentation related to oil and gas leasing in the RMP management area (Map 5.2 - Oil and Gas - Leases and Wells) identifies existing leases for oil and gas exploration and drilling. Three areas where leases are currently authorized (west of the Dolores River near The Palisade area [north and west of Gateway], the tower climbing and bouldering on the southern slopes of Mount Garfield near the trailhead access from I-70, and De Beque Canyon along I-70 and its side-canyons) have the potential to impact the recreational experience of climbers and others visiting these areas. The GJFO should consider limiting any new oil and gas leases at these areas and make no changes that could authorize new leases at any of the other climbing areas identified in this scoping letter. The GJFO should not make the same mistakes made in Utah by the Moab Field Office with regard to oil and gas leasing near high-value recreation areas, and be very clear about what areas could have new leases (within existing or future authorization areas), and the scope of impacts these leases could cause.	X			
PLC holds federal oil and gas leases throughout Northwest Colorado. One such lease is located in Hunter Canyon. This lease is surrounded by federal oil and gas units, and there are producing federal wells within a half mile of the lease boundary. However, development of this lease may never take place due to the restrictive nature of its stipulations, and BLM's apparent position that exceptions and waivers are not likely to be granted. Leases that are made subject to No Surface Occupancy stipulations covering the entire leasehold, as is the case with our Hunter Canyon lease, may be impossible to develop. While directional drilling is becoming more and more feasible from a technical standpoint, it is not yet a universally viable alternative. It would seem that the BLM feels it can issue an 811-acre lease and preclude occupancy of any part of the surface of that lease based on the assumption that directional drilling will work, without performing the necessary analysis to determine whether or not it is technically feasible. We believe that it is the BLM's responsibility to do such an analysis prior to offering a lease that is subject to No Surface Occupancy stipulations, particularly when they affect the entire area to be leased. In determining leasable lands and appropriate stipulations in the forthcoming planning effort, the BLM should analyze the technical feasibility of directional drilling where surface occupancy will be precluded. This analysis should include a hard look at the actual availability of surrounding lands: for example, lands surrounding our Hunter Canyon lease are likely to have the same resource-related restriction to surface occupancy.	X			

Table E-2 Representative Comments for Energy Development	Planning Classification <sup>1</sup>			
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Questar Exploration and Production Company is pleased to note that the planning criteria published in the Federal Register state that the RMP will recognize valid existing rights. The RMP should clearly disclose that fact to the public, and what it means so far as the scope of land use decisions made in the RMP. Existing oil and gas leases are contracts conveying certain rights which must be honored throughout the lease term. These rights cannot be curtailed by overly restrictive Conditions of Approval or management directions set forth in the RMP revision. The public needs to understand this important restriction to the scope of what an RMP actually is designed to accomplish.	X			
Audubon considers the wildlife and habitat resources of the GJFO planning area to be of high value and great significance both to the state of Colorado and nationally. In line with the COGCC rules, it is particularly important that the RMP establish the following guidelines: 1) Emphasize the use of comprehensive development plans and the best available technology to minimize the number of well pads that are established. 2) Require that oil and gas operators consult with the Colorado Division of Wildlife in Sensitive Wildlife Habitats in order to determine permit conditions, unless they agree beforehand to establishing only one well pad per square mile. 3) Require no or very restricted surface occupancy and operations within 0.6 mile of all Gunnison Sage-Grouse and Greater Sage-Grouse leks and within 0.4 mile of all Sharp-tailed Grouse leks, unless such occupancy is exempted during a consultation with CDOW.	X			
Does the Colorado Oil and Gas Commission final draft rules for surface impoundment of drilling production fluids apply to drilling activity on BLM lands? If not, we are concerned that adequate on site environmental protections are provided.	X			
The planning area contains a significant number of properties on which the surface and mineral estates have been split and are under separate ownership. Mesa Land Trust has been active in acquiring conservation easements on over 150 properties throughout Mesa County, and many of these properties overlay federally owned mineral estates. These properties contain important conservation values including winter range for deer and elk, prime and unique soils, and scenic lands of importance to the general public. In addition, federal, state, and local governments, as well as Mesa Land Trust, have invested significant public resources to conserve these natural, agricultural, and scenic values which can be significantly degraded by oil, gas, and minerals development. We ask that the BLM consider the conservation status of privately owned surface estates when evaluating parcels to include in oil, gas, and other minerals leasing auctions. We recommend that certain lease restrictions be applied to surface areas under conservation easement in order to lessen impacts to conservation values. Such restrictions could include no surface occupancy by the lessee of federal minerals or alternative extraction methods such as directional drilling from less sensitive sites, provisions for alternative access routes if standard routes interfere with migration corridors, seasonal use restrictions for certain areas, restrictions on uses and infrastructure, reclamation requirements, and metrics by which to measure the reclamation efforts. Due to the high ecological sensitivity and importance of many conserved properties, we recommend that the BLM requires lessees to come to a Surface Use Agreement with all surface owners so as best to protect the important conservation values and establish a program for any mineral extraction that may occur on the property.	X			
We recommend that the BLM coordinate various gas and utility companies to work better together both geographically and in scheduling	X			



Table E-2 Representative Comments for Energy Development	Planning Classification <sup>1</sup>			
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to avoid the unnecessary impacts on wildlife and ground disturbance that is currently being caused by each company acting independently.				
A decision which leaves the vast majority of the Field Office open to oil and gas development necessarily negates the effectiveness or long term viability of any conservation measures as there is always the potential that those conservation measures could be jeopardized by oil and gas development, regardless of how low the potential for development is. Recommendations: In order for the BLM to comply with FLPMA and NEPA the agency should, at a minimum, consider and “rigorously explore” the possibility and design alternatives which do not leave a significant portion of the Field Office open to oil and gas leasing. See 43 USC § 1712(c)(1) and 40 CFR §§ 1502.14(a) and 1508.25(c). We recommend, at a minimum, that the areas identified as having “low” oil and gas potential be removed from consideration for leasing. Further, BLM must consider a range of alternatives that will address what to do with currently leased lands which are not developed and are either terminated or expire. Not allowing oil and gas leasing in these areas would help the BLM move towards meeting its goal of managing the federal lands within its jurisdiction for a variety of uses, not primarily for oil and gas leasing. For lands which area identified as appropriate for leasing, a variety of non-waivable stipulations, conditions of approvals (COAs), and Best Management Practices (BMPs) should be developed to protect the many resources present in the planning area.	X			
The BLM must ensure that oil and gas development does not negatively impact our wildlife, air, water and general public health.	X			
Please do not allow [oil and gas] development to occur in areas where our public drinking water may be harmed.	X			
Proposed wilderness areas should be off-limits to oil and gas activities. In areas to be leased for oil and gas development, the plan should include measures to reduce the impacts that degrade wildlife habitat, including: <ul style="list-style-type: none"> <li>• Proceed with leasing on a phased basis, so resident wildlife will always find a place of refuge. Each tract should be reclaimed to effective wildlife habitat before the next tract is leased and developed. The oil/gas industry has bragged about its reclamation capability; let's see it used before new lands are opened.</li> <li>• Reserve crucial wildlife areas with “no surface occupancy” stipulations, including ungulate winter range and calving areas, sage-grouse leks with a 3-mile radius, and essential habitat areas for ungulates.</li> <li>• Require drilling to be concentrated on widely spaced drill pads, using directional drilling. This reduces the impacts of roads, drill pads, waste pits, pipelines and other facilities.</li> <li>• Oil/gas companies should be required to share access routes and pipelines where this would avert the impacts caused by separate facilities.</li> </ul>	X			
Additionally, for development that is occurring, please consider CDOW’s “recommended actions to minimize adverse impacts to wildlife resources” dated October 27, 2008 for incorporation in conditions of approval and wildlife management in general (please see attached). Upon providing greater detail associated with the alternatives, CDOW would encourage BLM to remove key wildlife habitats from continued leasing, and/or constrain development and incorporate more robust best management practices (please see attached).	X			

Table E-2 Representative Comments for Energy Development	Planning Classification <sup>1</sup>			
	A	B	C	D
We would like to see language regarding the use of COAs throughout the resource area with regard to leases. The constraints that existing leases have from a management stand point may be considered and alleviated with the use of COAs. For example, leases that lack the needed winter timing prescriptions may be remedied through COAs. A discussion of COAs and their uses for mitigation, reclamation and surface disturbance should be included in the alternatives.	X			
We encourage the BLM to impose only reasonable restrictions on oil and gas development as required by Section 363 of the Energy Policy Act of 2005, Pub. L. No. 109-58, § (b)(3), 119 Stat, 594, 722 (2005).	X			
The Reasonable Foreseeable Development in the new Resource Management Plan needs to be large enough to account for future development. With the discovery that the Piceance Basin extends further south than previously believed, new drilling and recovery technologies and national and international demand for energy, the number of natural gas wells should be expected to increase over the next 20 years.	X			
Reasonable Foreseeable Development for Oil and Gas. <ul style="list-style-type: none"> <li>• Take into account the historic development in the area.</li> <li>• Carefully analyze the potential for development from each geologic formation (Dakota, Morrison, Entrada, Wasatch, Mesa Verde, etc).</li> <li>• Account for surface disturbance based on the anticipated number of wells per pad and not by well. For example, anticipate directional drilling of 4-16 wells per 5 acre pad disturbance for producing horizons greater than 5000 feet in depth. Number of wells per pad would be predicated on downhole spacing. Account for interim reclamation of well pads from 5 acres down to 1-1.5 acres.</li> <li>• Engage operators in drafting the RFD. Enforce the importance of the accuracy of the numbers that are supplied.</li> <li>• Account or discount coal bed methane development possibilities.</li> </ul>	X			
Review the Oil and Gas Lease Stipulations in Appendix D of the existing RMP and determine if the stipulations are still valid.	X			
I value all of the open spaces that are left. I am strongly opposed to oil and gas development on our public lands. More drilling is not the solution to our nation's energy crisis. Specifically, if the North Fruita Desert is opened to gas drilling it will spoil a very special place, it will destroy a huge chunk of the tourist economy too. People all over the world come to ride bicycles north of Fruita.	X			
Certain areas should be presumptively avoided in siting renewable energy development, as well as transmission corridors. These places have been formally designated or otherwise identified because of their special natural values, which could be damaged or destroyed by the surface disturbance, alteration of viewsheds and features, impact to air and water quality, erosion, and increased human access likely to occur in connection with the construction and operation of energy development. Accordingly, energy development should not be sited in the following areas in the Grand Junction planning area: I. Wilderness Areas;	X			

Table E-2 Representative Comments for Energy Development	Planning Classification <sup>1</sup>			
	A	B	C	D
<p>2. Wilderness Study Areas (WSAs);</p> <p>3. National Monuments;</p> <p>4. National Conservation Areas;</p> <p>5. National Historic and National Scenic Trails;</p> <p>6. Other lands within BLM's National Landscape Conservation System (NLCS), such as Outstanding Natural Areas and Cooperative Management Areas, or areas that have been proposed for designation by pending legislation;</p> <p>7. ACECs;</p> <p>8. Threatened, endangered and sensitive species habitat;</p> <p>9. Other critical cores and linkages for wildlife habitat, such as that identified by state wildlife agencies through State Comprehensive Wildlife Conservation Strategies;</p> <p>10. Citizen Proposed Wilderness Areas, as set out in Congresswoman DeGette's Colorado Wilderness Act, currently pending in Congress; and</p> <p>11. Other lands with wilderness characteristics as identified by the land management agencies or the public, including in the pending Colorado Wilderness Act.</p> <p>Recommendations: If a net benefits analysis is conducted, which includes consideration of the highest renewable resource potential, least impact on conservation values and ecosystem services, efficient use – close to load served, expanded transmission support to renewables, decreased emissions of greenhouse gases, avoidance of protected and sensitive areas, and use of best management practices, and the analysis indicates that beneficial opportunities to develop renewable energy exist in the Grand Junction Field Office, we support the development of such resources. Renewable energy development should be prohibited in areas with identified conservation values. The RMP should also identify mandatory BMPs and the circumstances in which such BMPs are required to apply to the design, construction and operation of renewable energy development facilities in specified circumstances in a manner analogous to BLM's PEIS for Wind Energy Development.</p>				
The revised management plan should also set aside lands that have potential for developing solar, wind, and other renewable energy sources.	X			
There should be no new roads or surface occupancy in occupied sage-grouse habitat of either species. Allowed development should consider lekking, nesting, brood rearing and winter uses, which may require different buffer sizes in different habitats. Energy development should not be allowed in prairie dog towns, riparian areas, or other critical habitat. It is in the best interest of private land owners for the BLM to ensure the survival of both sage grouse and all prairie dog dependant species on BLM land.	X			
Oil and gas development is increasing in the resource planning area. CDOW recommends that (1) an oil and gas leasing EIS specifically be developed for the Grand Junction Field Office area concurrent with the RMP revision, (2) that	X			

<b>Table E-2 Representative Comments for Energy Development</b>	<b>Planning Classification<sup>1</sup></b>			
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pre leasing management prescriptions be carefully scoped for applicability of no surface occupancy and controlled surface use stipulations, (3) post leasing management criteria be more clearly defined through the planning process, and (4) within highly developed areas, more restrictive conditions of approval including provision for wildlife management and plans for wildlife habitat mitigation be developed. Other field offices have developed these EISs with great success (i.e., the 1999 Oil and Gas Leasing EIS for the Glenwood Springs Resource Area). The CDOW believes that energy development issues will drive much of the formulation of alternatives for this RMP.				
CDOW recommends: Spatial and temporal oil and gas planning	X			

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- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

Table E-3 Representative Comments for Recreation Management	Planning Classification <sup>1</sup>			
	A	B	C	D
<p>In addition to designating new SRMAs and protecting lands with wilderness characteristics in accordance with our separate proposals, certain areas in the Grand Junction Field Office merit special attention for management of recreation. At this time, we would like to highlight the following areas:</p> <p>West Desert Area: The revised Grand Junction RMP should provide adequate protections for parts of the west desert area – north of Fruita and west to the state line – where remaining white-tailed prairie dog towns support a host of birds and other species. Motorized use, and in some cases non-motorized use, should be restricted in order to minimize disturbance to these fragile communities. This is needed to ensure that habitat remains for burrowing owls (whose populations appear to have declined significantly in recent years), ferruginous hawks, pronghorn, kit fox and rare plant assemblages. The Colorado Natural Area for rare plants north of Mack should be protected from ORV use.</p> <p>Grand Mesa Slopes: Motorized recreation in the Grand Mesa Slopes area east of Grand Junction should be limited, with restrictions on motorized recreation within the boundaries of the Grand Junction municipal watershed. This includes portions of Whitewater Creek and Kannah Creek. The BLM should closely consult with the City of Grand Junction to ensure that recreation activities of any kind to not compromise the city’s water supply.</p> <p>North Desert: In the BLM area north of the GJFO headquarters to the base of the Book cliffs, motorized recreation should be sustainably managed so that it does not impact areas where white-tailed prairie dog habitat – and associated burrowing owl habitat – exists. In this RMP revision, the BLM should also address the impacts of extensive motorized recreation use on water quality due to selenium loading resulting from soil disturbance.</p> <p>Bangs Canyon: Management of this area needs to be reassessed in light of the failure of the current plan to provide adequate protection for the area’s wilderness characteristics and enhance opportunities to experience its remoteness and naturalness.</p> <p>North Fruita Desert: Active management of the implementation of the travel plan is required to ensure that use is kept on designated trails and does not degrade the experience of other users or the natural resources of the area.</p>	X			
<p>We recommend that the Grand Junction RMP be specific about the marketing strategies it will use for each new SRMA and recreation area. The marketing strategies should be designed to hold use levels down to those that will maintain the “distinctive, open-space character” of BLM settings referred to above. The BLM should obtain specific agreements/MOUs laying out the nature and extent of the publicity that will be done on each recreation area.</p>	X			
<p>“Community SRMA” Protection for Zones 4, 6, and 7</p> <p>We also recommend that Zones 4, 6, and 7 be classified as “Community SRMAs,” rather than being identified as part of the Gateway Canyon’s national “Destination SRMA” to provide a less highly publicized community recreation opportunity in keeping with the desires of users for keeping more primitive, less crowded and highly publicized available for regional users.</p>	X			

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<p>.....it is the hope of Gateway Canyons and John Hendricks that the current Resource Management Plan takes into account the high recreational value of the land that surrounds Gateway, It is our strong opinion that this recreational value far exceeds the value of speculative mineral leasing and extraction operations, While Gateway Canyons and John Hendricks have been supportive of the creation of good paying jobs in the area that might come about by mining activity, IT is also our view that a sustainable recreation and tourism industry will provide better long-term economic benefit to the area, Such a recreation based economy is often in conflict with mineral extraction and may not be sustainable if areas of this special land are not recognized and preserved as a part of the next Resource Management Plan. The goal of Gateway Canyons is to incorporate outdoor adventure on both private and public land with the educational, cultural and lifestyle enriching experiences of Gateway Canyons Resort Desired outdoor adventure activities on public land include hiking, mountain biking, scenic float trips, horseback riding, ATV and snowmobile experiences. Other more diverse uses of the land include stargazing, photography, scenic drives and the exploration of ancient places and ancient cultures.</p>	X			
<p>A few years back we had many meetings about land use in the Rabbit Valley allotments. As far as I can tell all of our recommendations went out the window and dirt bikers and four-wheelers were given all of the area to run-over, except one trail I see blocked off now on the northwest side. I don't think anyone uses the horse-parking area- we in our group said this was not the area for this- so the BLM goes ahead and builds it anyway.</p>			X	
<p>a. Preservation, creation and enhancement of opportunities for quiet recreation. The recreation resource on public lands is becoming increasing valuable: more people want to recreate on a finite amount of public land. As mentioned above, the vast majority of recreationists and other public land visitors desire solitude, clean air, clean water, vast undeveloped landscapes, and a place to witness healthy natural systems thriving with native plants and wildlife. The Grand Junction RMP should accommodate those desires as they are consistent with BLM Colorado's strategy for recreation management and the national BLM publication "Priorities &amp; Goals for Recreation &amp; Visitor Services." FLPMA and Applicable Off-Road Vehicle (ORV) Regulations: As discussed above, FLPMA requires the BLM to manage the multiple uses and resources of the public lands, which include fish and wildlife, watersheds, scenic values, recreation opportunities, scientific and historic values, and other natural values, such as wilderness characteristics. FLPMA also provides for the agency to do so by excluding or limiting certain uses of these lands. BLM's regulations relating to management of off-road vehicles, similarly acknowledge the need to address the manner in which motorized recreation can prohibit other experiences, requiring that both areas and routes for off-road vehicles be located to "minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors." 43 C.F.R. § 8342.1 (emphasis added). Providing a "quiet" recreation experience, as also discussed in reference to opportunities for primitive, unconfined recreation and for solitude provided by lands with wilderness characteristics, also requires thoughtful management to provide for a quiet soundscape. Much research exists on the importance of natural sound to public land visitors. Noise impacts on the</p>	X			

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<p>recreational experience have become a looming issue in today’s noisy urban world. A recent study by the National Park Service showed that whereas upwards of 98% of national park visitors come to experience scenic landscapes, fully 97% are also there to experience the natural soundscape. We recommend the GJFO conduct a soundscape analysis to guide formulation of intended user experiences, for example by analyzing how canyon topography might block or propagate vehicular sound and how that might affect quiet users, neighboring homeowners and wildlife habitat effectiveness. We ask that the alternatives specifically compare impacts of, and the potential for the increase of ORV noise on natural sound and other resources, consistent with the BLM’s regulations.</p> <p>The BLM’s ORV regulations also provide for protection of other values that are critical parts of not only a healthy ecosystem on BLM lands, but also of enjoying quiet recreation activities, such as hunting, photography and bird-watching, requiring that management minimize “damage to soil, watershed, vegetation, air, or other resources of the public lands” and harassment of wildlife or disruption of habitat; and to prevent impairment of wilderness suitability or adverse affects on natural areas. 43 C.F.R. § 8342.1. Landscape level planning, including through use of the travel planning template attached to these comments and assessing road density, as described in more detail above, is another important tool for ensuring that quiet recreation opportunities are preserved.</p> <p>Colorado BLM Instruction Memorandum CO-2007-020: This guidance acknowledges the importance of comprehensive recreation and ORV management to “facilitate attainment of management objectives and maintain prescribed setting character—which is also essential to achieving Benefits-Based Management objectives.” The IM also restates BLM’s commitment to generally limiting motorized use to designated roads and trails, such that “open areas will be limited to a size that can be realistically managed and geographically identifiable” and “expansive open areas allowing cross-country travel, without a corresponding and identified user need/demand, will not be designated in RMP revisions.”</p> <p>Further, the guidance provides for designating routes to dispersed camping and day use sites and limiting use of motorized vehicles to these routes, only providing for use off of these routes where “needed” and “appropriate,” and then subject to specified distances and time periods; in this context the IM refers to being “consistent with the policies of the United States Forest Service OHV Rule.” Since the Forest Service has been updating its guidance, we wanted to clarify the manner in which dispersed camping should be handled to be both consistent with this policy and with BLM’s other goals for management of the public lands in the Grand Junction Field Office. The Forest Service Travel Management Rule (36 C.F.R. § 212.51(b)) provides, in relevant part:</p> <p>The responsible official may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes solely for the purposes of dispersed camping or big game retrieval. Such designations represent site-specific decisions associated with specific roads and trails or road or trail segments, rather than a blanket exception to the rule. Designations under 36 CFR 212.51(b) will be applied sparingly to avoid undermining the purposes of the rule and to promote consistency in implementation. (emphasis added).</p> <p>The Forest Service Travel Management Directives, proposed March 9, 2007, and finalized December 8, 2008, reinforces that the allowance for dispersed camping is a designation of motorized use, as opposed to a blanket exception to designation of motorized use. FSM 7715.64</p>				

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	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>provides, in relevant part:</p> <p>2. [This authority] should be used sparingly to avoid undermining the purposes of the travel management rule and to promote consistency in its implementation.</p> <p>....</p> <p>4. Responsible officials should consider providing designating [sic] routes to dispersed camping sites as an alternative to authorizing off-route use...</p> <p>Accordingly, as stated in the rule and directives, any dispersed camping allowance must be treated as a specific designation and consistent with other travel planning regulation and guidance, which is also consistent with the provisions of Colorado IM CO-2007-020. The Southern Rockies Conservation Alliance recommendations on application of the Forest Service approach are similarly applicable here: BLM should allow visitors to disperse camp generally, but restrict motor vehicle travel for the purposes of dispersed camping according to a combination of the following options, as dictated by resource, safety, and private property concerns:</p> <p>a) Forest visitors may park a motor vehicle within one vehicle length from the edge of the road surface when it is safe to do so and without causing damage to the resources of the public lands (campers walk to access a backcountry camp of their choosing), and/or</p> <p>b) Motor vehicles may access signed campsites via designated camp spur routes that are signed and demarcated on a travel management map.</p> <p>In certain places or certain times, the BLM may need to restrict dispersed camping altogether. These provisions should be incorporated in the Grand Junction RMP.</p> <p>Land Health Standards: Healthy lands are a critical part of recreation experience, and it is equally important that recreation not degrade the quality of the public lands, as acknowledged by FLPMA and the regulations discussed above. We recommend that the recreation portion of the RMP take as one of its primary objectives to meet or exceed the 1996 Colorado BLM Land Health Standards (approved in February 1997 by the Secretary of Interior ) pertaining to “Upland Soils and Riparian Systems,” “Healthy Plant and Animal Communities,” “Special Status and Threatened and Endangered Species,” and “Water Quality.” The Colorado BLM’s Recreation Management Guidelines, issued in December of 2000 by the Resource Advisory Councils of Colorado in partnership with the agency, commit to management of recreation “while at the same time minimizing and preventing adverse impacts to land health, ecosystems, and cultural or natural resources” and specifically incorporate and attach the Land Health Standards.</p> <p>Colorado BLM Recreation and Visitors’ Strategy: The 2007 Colorado BLM Recreation and Visitors’ Strategy directs managers to consider impacts on “land health standards” ( p. 4) and the need to “uphold our [BLM’s] fundamental duty to meet or exceed land health standards” (p. 6). This strategy also provides an approach that will maintain the open spaces on the lands managed by the Grand Junction Field Office. Many portions of Grand Junction BLM lands, not just WSAs and proposed wilderness, fall into the more primitive category of BLM lands that are at particular risk for losing their naturalness. The 2007 Colorado BLM Recreation Strategy emphasizes the importance of</p>				



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<p>maintaining the “distinctive character” and “wide open spaces” of Colorado BLM lands (p.3). The Strategy emphasizes the “need to maintain the distinctively undeveloped and open space character of its [BLM’s] recreation settings” (p. 7). The BLM should commit to actively managing these lands to protect and enhance the primitive, backcountry experience.</p> <p>Guidelines for Managing Access between BLM and Private Lands in the Royal Gorge Field Office: These guidelines, incorporated in the Royal Gorge RMP and endorsed by the Front Range Resource Advisory Council (and attached to these comments), provide generally that: “Other than for foot and horse uses, entry to public lands from private lands must comply with the designated transportation system and be limited to the same means of travel that the general public uses from public access points.” These guidelines were developed to address a substantial increase in user-created motorized roads and trails leading from private lands onto the adjoining Public lands that did not comply with federal management. These guidelines should be incorporated into the Grand Junction RMP.</p> <p>Standards for Issuance of Special Recreation Permits: BLM should adopt unambiguous, protective criteria for issuance of special recreation permits (SRPs) in order to effectively manage the increase in commercial and competitive group activities that can have a significant impact on the lands in the Grand Junction Field Office. The BLM Handbook on Recreation Permit Administration (H-2930-1) clearly states that field offices can and should develop guidelines for issuing SRPs. The Handbook states: “Field Offices are encouraged to develop thresholds through land use planning for when permits are required for organized groups and events for specific types of recreation activities, land areas, or resource settings” H-2930-1 at 13. On the issue of Special Area Permits, the Handbook states: “Applications for Special Area Permits issued to individuals are processed according to the area-specific land use and/or business plan, or guidelines approved by the State Director.” H-2930-1 at 17. The Grand Junction Field Office therefore must provide clear guidelines for processing Special Area Permits, because in this situation the Handbook directs that permit issuance will tier to the RMP.</p> <p>The Price Field Office Draft RMP (Appendix 14, attached to these comments) provides an excellent example for evaluating SRP applications and issuing such permits. It classifies SRPs into four distinct classes, ranging from least intensive to most intensive, based on specific factors such as type of equipment, size of area used, number of participants, etc. These factors are defined and then compared in a simple permit classification matrix consisting of Classes I through IV (with I being for smaller and less impacting events and IV being for larger, more impacting events). Each Class also has an example of the type of event that may fit into the category. After the Class is determined, the BLM can then look to see how permit types fit into Recreation Opportunity Spectrum Classifications and/or Special Recreation Management Area (SRMA) or Extensive Recreation Management Area. Various SRMAs can be broken into classes and it is easy to see what types of uses and events should be permitted for each area. Because the standards set out in the Price Draft RMP are very specific (for example, surface disturbance of 5-40 acres ranks as “medium intensity”), BLM can easily determine whether to issue an SRP and where, and can better estimate cumulative impacts from such permits. The Grand Junction RMP should use the model provided by the Price Draft RMP for classification of SRPs to define which uses may be appropriate or inappropriate in specific areas. BLM has not only the discretion to establish SRP guidelines, but also the obligation to do so in order to protect the resources that the RMP is intended to protect and sustain.</p>				

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<p>Criteria for Addition of New Motorized Trails: In assessing whether additional motorized trails are appropriate, we recommend use of the criteria set out in the BLM Arkansas River Travel Management Plan Environmental Assessment, Appendix 6 (pp. 225-227), attached to these comments (and available online at: <a href="http://www.blm.gov/pgdata/etc/medialib/blm/co/field_offices/royal_gorge_field/travel_management/arkansas_river_travel.Par.98563.File.dat/ARTMP_Final_EA_12062007.pdf">http://www.blm.gov/pgdata/etc/medialib/blm/co/field_offices/royal_gorge_field/travel_management/arkansas_river_travel.Par.98563.File.dat/ARTMP_Final_EA_12062007.pdf</a>), which state (with emphasis added):</p> <p>To provide for continued motorized uses, while also protecting the area's resources, the ID team offers the following recommendations for guiding future management and development of the Texas Creek OHV Area:</p> <ol style="list-style-type: none"> <li>1. Continue and strengthen long-term partnerships with motorized user groups (COHVCO, CMTRA, RMTA, etc.) for the purposes of maintaining existing trail networks and for constructing new trails.</li> <li>2. A significant factor in approving new trails depends on the ability to maintain existing trails to agreed standards. With the participation of cooperating partners, develop accepted standards and guidelines for constructing and maintaining new and existing trails.</li> <li>3. With the participation of cooperating partners, establish a system and procedures for monitoring trail conditions and performing necessary maintenance work.</li> <li>4. Approve construction of new or additional trails only when the following conditions have been met: <ol style="list-style-type: none"> <li>a. The proposal would further the goals [desired future conditions] (DFCs) identified on page 2.</li> <li>b. The proposal is sponsored under a partnership agreement that includes a plan for securing the necessary funds and/or volunteer commitments to construct and maintain the trail to accepted standards.</li> <li>c. The specific location(s) of the proposed trail(s) has been flagged on the ground and mapped using GPS.</li> <li>d. The decision to approve the trail(s) has been authorized under a site specific EA that analyzes the environmental effects of the proposal.</li> </ol> </li> </ol> <p>Recommendations: In managing recreation on the lands of the Grand Junction Field Office, the RMP should ensure that quiet recreation opportunities are given sufficient attention and that management of motorized recreation, in general, is also designed to protect the experiences of other public land visitors. Comprehensive travel management planning, including landscape level planning and road density analysis, as well as compliance with land health standards, will also ensure healthy ecosystems that can support positive recreation experiences. Further, coordinated BLM and Forest Service guidance on management of motorized vehicles and dispersed camping, managing access between public and private lands, issuance of special recreation permits, and strict criteria for addition of motorized trails will also help the agency to maintain the distinctive open space character of Grand Junction BLM lands</p>				
<p>Additionally to make the area near trailheads more user friendly and to lessen impact, we would like to suggest that the BLM create a few 'park and hike' areas. The 'Wildcat Trail' trailhead would be an example of a place this sort of minimal development would be desired.</p>			X	
<p>Along with protecting natural resources and wilderness character, it is important that the Bureau of Land Management protect and expand the availability of opportunities for traditional, quiet recreation in the Gateway Special Recreation Management Area (SRMA).</p>	X			

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We also urge you to use pro-active language when referring to quiet use – the designations of “motorized” versus “non-motorized” are often used in land management planning, and we are seeking to re-conceptualize this distinction. We prefer to be defined by what we are, rather than being defined by what we are not. We are traditional users of the land who seek quiet recreation experiences, both in the front-country and backcountry, and in wilderness and non-wilderness landscapes.				
Bear-proof/animal-proof dumpsters should be provided in areas of high usage, especially along the Dolores River Hwy 141 corridor.			X	
BLM planning should take into account the substantial already existing non-motorized opportunities in balancing the demands of a small minority that no, or minimal, motorized recreation be allowed and/or in considering minimizing conflicts.	X			
Campgrounds along the river could impact black bear foraging.	X			
	X			
Climbers are particularly interested in the following areas covered by this planning activity because they are historic and active climbing venues: Bangs Canyon, Rough Canyon, Unaweep Canyon, De Beque Canyon, the Gateway area, and areas surrounding the town of Palisade.	X			
Create an increased awareness, understanding, and sense of stewardship in recreational activity (i.e., fishing, boating) participants so their conduct safeguards aquatic resources.	X			
Designation of back country campsite areas, allowing for limited dispersed camping, would be favorable to allowing camping within 300' of any road/trail throughout the entire travel system.	X			
Dispersed camping and off-road game retrieval Recommended policy: BLM visitors may park a motor vehicle within one vehicle length from the edge of the road surface when it is safe to do so and without causing damage to the public land's resource (campers walk to access a backcountry camp of their choosing), and/or Motor vehicles may access signed campsites via designated camp spur routes that are signed and demarcated on a travel management map	X			
Emphasize Quiet, Primitive Experiential Outcomes The Recreation Benefit Study conducted by Arizona State and Mesa State College found nearly one-third of the people using the area come from Grand Junction; the most popular activity in the area is hiking; and most people who use the area appreciate it for its scenery, solitude and recreation activities. This preponderance user preference is echoed as well by the BLM Recreation and Visitor Service Strategy. This suggests that at least some of the area should have been a Community or Undeveloped SRMA, or an ERMA. It also means the Gateway RAMP needs to emphasize less intense, less high-impact activities and experiences and the RMZs need to stay in primitive or backcountry settings to meet the quiet, undeveloped, unstructured recreation market identified by both the visitor benefit study and the Strategy. In emphasizing Quiet recreation, we recommend the GJFO expand on the Outcomes checklist currently being used by BBM. The checklist places undue emphasis on utilitarian recreation uses of BLM lands and for the Gateway RAMP should be expanded to include more	X			

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<p>contemplative, less impacting activities and experiences including as the experiential benefits of photography, painting and sketching, listening to natural sounds, fishing, etc. Studies show that the benefit of nature to youth and other age groups is not just engaging in physically demanding social and group activity but in staying still, listening, hearing, sensing, dwelling, smelling, tracking, concentrating, and being immersed in nature and a natural soundscape. Studies show these more contemplative encounters with nature have important social benefits in reducing hyperactivity in children and increasing lesson performance.</p> <p>And because targeted outcomes are the ultimate goal of the new BBM approach and the metric by which the success of the Gateway RAMP will be measured, making use of an expanded outcomes list is critical. We recommend that the Gateway Recreation Plan implement an expanded Outcomes list that greatly beefs up the contemplative categories of experiences now listed.</p> <p>Nor should the Negative Outcomes on the checklist be ignored. For each positive outcome listed in the plan such as challenge, physical exertion, or “a chance to test my equipment,” there should be a listing of the negative effects such experiences could have on wildlife and the quieter, less active types of visitor experience.</p> <p>We are interested in knowing more about how the metrics for evaluating attainment of the outcomes will be developed. We would also like to stay in touch, as Adaptive Management strategies are developed as a response when targeted outcomes are exceeded.</p> <p>Examples of management responses to overcrowding for example are: reduced marketing, smaller trailheads and parking, less improved trails and many others. We would like to stay in touch as these processes are developed.</p> <p>One reflexive response to increased crowding is to expand use onto more miles of trails. From a landscape integrity standpoint this simply increases existing habitat fragmentation and route densities. Better is to find ways to expand trail use in a limited number of corridors. Best of all is to avoid attracting additional use that will strain resources and trail system capacity in the first place.</p> <p>We are also interested in the eventual possibility of setting visitor capacities based on the carrying capacity of the lands and the need to maintain specified levels of encounters and group sizes prescribed in the settings. Capacity is defined as the maximum number of users that can pass through a given area during a given time period under existing trail conditions; also the amount of use a given resource can sustain before an irreversible deterioration in the quality of the resource begins to occur” (American Trails, 2003).</p>				
<p>Ensure the continued availability of outdoor recreation opportunities (i.e., fishing, boating) which the public seeks without increased impacts to unique resources.</p>	X			
<p>Existing Conditions and Remoteness Criteria</p> <p>We would like to have an opportunity to learn how “physical settings” have been mapped for each RMZ, using the settings matrix remoteness criteria. We have noticed a tendency for the “distance from improved roads” remoteness criteria to be translated into settings classifications that are more developed than are the actual conditions found on the ground.</p> <p>Like many BLM lands, Gateway Canyons contains historic “improved” roads that get very little use and therefore do not interfere with the essential backcountry feel and character of the land. The presence of such roads should not be a reason to reclassify existing primitive or</p>	X			

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<p>backcountry settings as front country or rural settings.</p> <p>Applying Benefits Based Management “experience” criteria to such roads shows that visitors often “perceive” a backcountry feeling even though a strict, technical application of the “distance from a road” criteria might lead to an area being placed in a middle country or front country setting.</p> <p>We understand that the emphasis in the recreation plan is on “prescribed settings” rather than on existing conditions. However, the reason it is important not to apply the remoteness criteria in a way that downgrades “existing conditions” into more developed settings is that it makes it easier for the “prescribed settings” to be likewise artificially skewed toward the developed end of the spectrum.</p> <p>Instead, “existing conditions” identified by the remoteness criteria should reflect the backcountry experience many users are feeling despite the presence of roads. That in turn will lead to settings prescriptions that preserve the “quiet experience” recreationists are still able to experience, even in roaded landscapes where road use is low.</p> <p>We encourage you to assign the backcountry category to both physical and prescribed settings when low-use roads are present, as many users appreciate (and in the new plan will want to experience) the backcountry feeling they experience near roads.</p> <p>There is also a strong need to reduce road densities in several portions of the planning area. The RAMP should provide for the closing of roads and trails to reduce road densities, increase habitat effectiveness, and to place more land in the primitive setting category.</p> <p>We urge you as well to acknowledge and preserve another type of experience many visitors are looking for when hiking or road-touring on BLM lands. That is: the "pastoral," "rustic," "frontier," and ranch-land type settings, and the historic mining ambience of the old uranium roads. ATV, motorcycle and mountain bike trails systems should not be placed in locations that still retain this historic, pastoral, rustic, frontier quality that is so highly prized by BLM visitors.</p>				
<p>Furthermore, it is important to keep high-traffic ORV usage out of all of areas which have wilderness character, and areas that are bordering critical wildlife habitat.</p>	X			
<p>Gateway Canyons supported and participated in an earlier scoping process for the creation of a Special Recreation Management Area in and around Gateway and has been in favor of the findings that were informally presented by the Grand Junction Field Office in that process. I incorporate the substance of the letter written by lee Bowden, General Manager at Gateway Canyons, as part of the Special Recreation Management Area process. A copy of lee's letter dated March10, 2008 is enclosed. Gateway Canyons and John Hendricks specifically support inclusion of the distinct recreational zones that were to have been a part of the SRMA into the future Resource Management Plan.</p>	X			
<p>Grand Junction requests BLM consider non-point source pollution prevention methods apply to all recreation areas to prevent stormwater pollution resulting from public lands. This could include providing trash containers and pet waste bags at the entrances of heavily-used recreation sites.</p>			X	
<p>Hunting and fishing has been enjoyed by many generations of people. It remains important for good management practices to be followed and access for all hunting and fishing be maintained.</p>	X			

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I am most interested in areas within the Plateau Valley but we recreate all over the Western Slope and the BLM lands within the Grand Junction Field Office.	X			
I am saying, without a doubt, that the biggest problem on the public lands today, that is more widespread, causes more disturbed acreage, causes more erosion, disturbs more wild life, & transports more noxious weed seeds than any other activity, and that is recreational vehicles. Be it ATV's, dirt bikes, bicycles, or snow mobiles!! ! This must stop or at least be regulated in some way. If this can't be done, then a substantial fee charged & the proceeds go toward the revegetation of these abused areas. I have seen "first hand" that signs do not work, UNLESS THERE ARE CONSEQUENCES. IE LARGE FINES !!!!! If you keep these areas open to motorized vehicles & just put up signs with no enforcement, IT WILL BE A WASTE OF \$. THEY WILL BE USED AS TARGETS...	X			
I moved to GJ, from Aurora, in 2002. My main reason for moving here was to have a better quality of life due to the available recreation opportunities on public lands and a smaller city environment. I love spending time in the outdoors. It is my therapy and is so rejuvenating for me. ATV-ing is my preferred activity. In 2003, I joined the local ATV club, Western Slope ATV Association (WSATVA). I am a responsible ATV user and WSATVA is very active in ATV use public education and trail maintenance. I purchased property with 3 sides surrounded by BLM for the reason of being able to access public land from out of my front door, to enjoy outdoor recreation. Mesa County, and the whole area included in this management plan area, is a haven for outdoor enthusiasts. Whether it's hiking, sightseeing, mountain biking, ATV-ing, dirt biking, snowmobiling, 4-wheeling, camping, photography etc, this is the place to do it! We live in a wonderful, beautiful place, where I do not want to see our public lands taken away or further restricted from my preferred use.	X			
Identification of Gateway as a National Destination Market A case in point is the selection of Gateway for a National Destination Market despite BLM-sponsored studies that show that the majority of Gateway use is from the local area. The process for this decision appears to be murky and lacking transparency. We recommend it be clarified in the RMP. BLM regulations state that the identification of a SRMA is not to be done lightly. The Appendix C language (H-1601-I – Land Use Planning Handbook, Appendix C, p. 15) places the burden of proof on the agency to prove that an SRMA is warranted: "Recognition of a singularly dominant activity-based recreation demand of and by itself, however great, generally constitutes insufficient rationale for the identification of an SRMA and the subsequent expenditure of major investments in facilities" It is not clear what recreation interests were consulted in the determination that a large-scale, national SRMA was needed for Gateway, or whether the decision was opened up to the full range of recreation users in addition to the resort, for example local users. In particular, we question why it was decided that the entire 198,000 acres was determined to be a National Destination Market SRMA rather than only portions. Mesa State and Arizona State studies done as part of scoping show that the bulk of the market demand/niche for Gateway is local and regional, suggesting that some of the Gateway zones might better lend themselves to "community" or "regional" recreation markets.	X			

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<p>SRMAs are defined in the H-1601-1 – Land Use Planning Handbook (LUP), Appendix C as having “ ...highly visible ..resource attractions that are managed to provide structured recreation opportunities in response to demonstrated national or regional recreation-tourism demand.” “Major investments in facilities are authorized in these areas.”</p> <p>198,000 acres is a very large area over which to contemplate “Major investments in facilities.” Such facilities could significantly alter the natural feel and appearance of the Gateway landscape. Not to mention the expense and challenge of effectively managing structured recreation over such vast and inaccessible terrain. Public scoping comments and the studies cited above show overwhelmingly that regional users prefer the undeveloped, remote and primitive settings to developed, structured settings. How was this national recreation demand “demonstrated,” was public input incorporated, and why was it decided that the national destination market applied to the entire Gateway area rather than just to some portions?</p> <p>Moreover, we are concerned that planning recreation for Gateway under the a National Destination rubric could skew/bias the process of identifying RMZ settings toward Front Country and Rural settings, rather than reflecting the primitive, backcountry and middle country settings most of these zones are now in.</p> <p>Recommendations</p> <p>To better reflect “distinctive open space” conditions on the ground as well as local and regional demand, we recommend that portions of the Gateway planning unit be redesignated “Community” or “Undeveloped” SRMAs.</p> <p>The LUP regulations allow dividing “areas that have more than one distinct, primary recreation market into separate SRMAs” (H-1601-1 – Land Use Planning Handbook, Appendix C, p. 15).</p> <p>Many scoping responses asked that the remote, primitive character of the landscape be retained. This shows that there is a large local and regional market both for Community SRMAs and for the kinds of unstructured, settings that Undeveloped SRMAs provide, a demand to which large portions of the Gateway unit are well suited. We note that the “Undeveloped SRMA” designation has been used in the Little Snake Field Office and Wyoming RMPs to specifically prevent downsiding of ROS and to protect primitive settings.</p> <p>For these reasons, we recommend the BLM revisit the national destination decision and consider breaking the area into a mix of destination, community and undeveloped SRMAs.</p>				
<p>In addition, a developed Campground [in Cactus Park] will help accommodate the foreseeable increase in visitors as the Bangs Canyon and Tabeguache Trail improvements come on line.</p>	X			
<p>In cases where private land blocks public access to adjacent BLM lands, we support the policy issued by the Royal Gorge Field Office, and endorsed by the Front Range Resource Advisory Council, which disallows exclusionary access from private lands for OHVs and mountain bikes. We recommend the Grand Junction Field Office adopt this policy if there is not already a similar policy in place. We note the opposite problem can also arise when an adjacent landowner funnels unchecked motorized use onto BLM lands. A policy is needed to address this problem and the levels and intensity of use that is created as well.</p>	X			

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	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
In my 60 years of hiking and enjoying public lands, I have had two near misses by carelessly fired guns (bullets within 25-50 feet). Restrict firearm use to hunting seasons where there is game that can legally be hunted. "Varmint" shooting, i.e., "kill everything that moves" is not sport and is a terrible thing to allow on public lands owned by all Americans.	X			
In the face of a growing resident and visiting population in the intermountain west, the BLM should develop a resource and recreation capacity model that establishes indicators and standards that are linked to land function and user experience. Recommendations: The BLM should develop a pilot capacity model for the Grand Junction Field Office and we would be interested in working with you on this. For more information, we also recommend contacting National Parks that have engaged in the process, which includes Arches National Park and Kenai Fjords among others.		X		
In the Grand Junction RMP we encourage the BLM to use special recreation management areas to reverse the ongoing downslide of recreational settings into more developed categories and preserve or restore settings to the primitive and backcountry category – providing a prescriptive approach to creating, enhancing and protecting quiet recreation experiences on our public lands, using the tools and guidance set out above. The Land Use Planning Handbook (in Appendix C and as further defined in the Glossary) provides for BLM to establish special recreation management areas (SRMAs) in the lands governed by the Grand Junction RMP. Depending upon the anticipated use of each SRMA, BLM should adopt different management strategies. The Handbook identifies the following general types of recreational use: Undeveloped – These areas are managed to support dispersed recreation, maintaining their highly-valued, distinctive, undeveloped recreation setting character. Within the bounds of legal requirements and sound management practices, resource and visitor management actions exercise minimal regulatory constraint and exclude major investments in facilities and visitor assistance to preserve the visitor's freedom to choose where to go and what to do. Community – These areas adjoin communities and are managed to provide structured recreation opportunities in response to recreation-tourism demand generated by community and/or tourism growth and development. The areas are managed to maintain natural resource and/or community setting character, with appropriate restrictions on marketing, administration and other management actions. Destination – These areas have distinctive, highly visible, or otherwise outstanding resource attractions that are managed to provide structured recreation opportunities in response to demonstrated national or regional recreation-tourism demand. The areas are managed to maintain natural resource and/or community setting character, with appropriate restrictions on marketing, administration and other management actions. In the context of the BLM's Benefits Based Management (BBM) framework, it is critical that the range of SRMAs, including recreation management zones (RMZ), and their management prescriptions are written to enhance the other values that ultimately contribute to the benefits and experiences of the area and provide significant opportunities for primitive recreation experiences. SRMAs should include those with an "Undeveloped" market and, even though they will not be managed by extensive facilities, require active management to protect	X			



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<p>their lands from other uses and activities that will destroy the undeveloped recreation setting and experience.</p> <p>Some of the supporting materials for analysis of recreation settings set out standards for primitive physical settings that appear to unreasonably limit the lands that could be considered to provide a remote, primitive recreation “experience.” Accordingly, the BLM should not use those standards as a “bright-line test” to disqualify areas which are or could in the future provide a primitive recreation experience. Rather, the standards should be used as a goal which proper management could help the areas achieve and focus on the experience that can be achieved.</p> <p>IM CO-2007-020 directs BLM managers to: “Ensure that travel management decisions...maintain prescribed setting character...” (p. 2). The IM specifies tools to be used for maintaining settings, stating on page 2 that: “For areas with Limited and Open categories, managers may impose several different kinds of limitations including vehicle numbers, types, use times or seasons, permitted use.....” (emphasis added). The notion of limiting numbers of recreation users needs to be incorporated into the adaptive management measures adopted for all recreation planning in the Grand Junction Field Office, particularly for portions of Grand Junction Field Office where growth in recreation use should not be the goal. Prescriptions to ensure primitive recreation opportunities are provided should also include soundscapes, special recreation permits, and road density.</p> <p>In this manner and as part of achieving the goals of a BBM system, areas which have primitive character should be managed for that experience and desired future condition, even if they do not currently meet all of the criteria that the BLM has set for primitive physical settings or designation. By adopting such a prescriptive, or aspirational management approach, as opposed to a more descriptive or reactive approach of just basing the management of the zones on perceived evidence of human presence or an expectation of more people wanting to use the area, the BLM can ensure that some level of existing disturbance does not disqualify areas which do provide a primitive experience from a decision to manage them to protect and enhance such qualities and provide this important experience.</p> <p>Recommendations: BLM should adopt a range of SRMAs and management prescriptions which provide adequate opportunities for non-motorized or quiet recreational experiences and are written to enhance the other values that ultimately contribute to the benefits and experiences of the area. BLM should use an aspirational approach which allows the agency to ensure that some level of existing disturbance does not disqualify areas which do provide a primitive experience from a decision to manage them to protect and enhance such qualities and provide this important experience. The SRMA proposals and wilderness inventory submitted under separate cover identify key areas for protecting primitive recreation experiences.</p>				
In the implementation EA, adequate trailheads, signing and visitor services need to be included.			X	
In this poor economy there will be more use of public lands for recreation. Our feeling is that the public lands should be available for the public use and would like to see designated ATV use for those of us that always and respected the land, but are now aging and unable to hike into areas that have all access locked off. We feel that those lands belong to our grandchildren as well as to their parents and to us and would like to be able to share them with future generations.	X			

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	A	B	C	D
It is important for off road vehicle enthusiasts to continue to recreate responsibly in designated ORV areas.	X			
It is very important that the BLM consider non-motorized recreation as very important. My husband and I enjoy hiking, biking and hunting. We need a place to “get away” from the noise.	X			
Keeping public land open to all users, Motorized, hikers, mountain bikes, and equestrians is a great concern to me. As more people come to this area there needs to be as much public land open as possible. ...	X			
Likewise, all forms of recreation do not have to be accommodated within a planning area. Certain recreation activities may be determined to have such adverse impacts to other resources and values, such as wildlife habitat, wilderness characteristics, and opportunities for quiet recreation, as to render them incompatible with BLM’s mandate to manage for the protection of those resources. Further, high impact recreation should, as a general rule, be less accommodated for on public lands than low impact, quiet recreation. High impact recreation, such as extreme motorized rock crawling, requires an intense level of management, enforcement and mitigation to minimize conflicts and prevent resource damage; given the frequent budgetary constraints facing the BLM, the necessary funding for such management is often simply unavailable.	X			
long-term goals desired by Gateway Canyons and John Hendricks are: Preservation of the scenic view corridors along the Dolores River and West Creek. The river corridors should never be spoiled by drill rigs, mine exploration and other industrial/commercial uses.	X			
More dispersed camping	X			
My family and I enjoy exploring all of western Colorado in our four- wheel drive. We especially spend more time in Delta, Mesa, Garfield and Montrose county since we live in Delta county.	X			
Non-motorized recreation and wildlife protection are most important to me. Hence, ORV and mountain bike use and drilling are usually negative issues to me.	X			
Not all zones within the Gateway TMP or areas within the GJ RMP can/should provide for every type of usage demanded. Areas of high motorized usage should be determined on the basis of a resource needs assessment, and the capability of the BLM in containing such usage so as to minimize/prevent resource damage. Certain areas such as those in the desert north of GJ have basically become "sacrifice zones" and seen the loss of significant plant and animal species over time. Given the high usage of such areas, and the tendency on the part of some to trash such areas, means of curtailing trash disposal and providing for restroom facilities need to be considered. Allowance of motorized use throughout the greater RMP area needs to be permitted in such a way that natural resources are protected, buffer zones adjacent to wilderness or wilderness-proposed areas are sufficient, viewsheds and "quiet areas" are kept intact, and wildlife travel corridors are conserved. Placement of trails and allowance for undeveloped campsites should be set back a reasonable distance from the rim of canyons for multiple reasons, given the presence of falcon aeries, and the need for limiting disruption of sight and sound landscapes.	X			
One of the factors the BLM uses to determine setting prescriptions is “distance from an improved road,” or the “remoteness” criterion	X			

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<p>found in the Settings Classification Matrix. Greater distances from roads will put an area into a less developed setting on the Settings Classification Matrix. The developed or undeveloped character of a physical setting in turn helps determine the level of development a setting will have in the social and managerial settings of the matrix.</p> <p>We have noticed a tendency for “distance from a road” to be justification for classifying an area more developed on paper than the actual conditions on the ground warrant. This in turn makes it easier for social and administrative settings to be similarly skewed toward a more developed management goal.</p> <p>Like many Colorado BLM lands, the Grand Junction Resource Area contains historic “constructed” roads that get little or no use and therefore do not interfere with the essential backcountry character and feel of the land. Visitors may experience a remote, backcountry feeling, even in the presence of seldom used roads. Spatially analyzing “distance from a road” and using the criterion for determining a landscape’s remoteness does not take into account other subjective qualities of the landscape and does not give the BLM an accurate frame of reference from which to make a decision on the undeveloped and backcountry nature of an area. Another reason that existing settings may be upgraded to a more developed setting within the matrix may be due to the long lifespan of an RMP. Managers anticipate increased recreation demand over the life of an RMP, and assign Front Country or Rural settings to areas that are currently Backcountry in character. Upgrading existing settings in this manner becomes a self-fulfilling prophecy. Setting high numbers of encounters and group sizes up front opens up an area to increased use, leading in turn to further setting upgrades down the line.</p> <p>Recommendations: Despite the likelihood of increased demand and the physical proximity of a road, we feel it is important to make every effort to preserve the undeveloped and backcountry experience wherever possible. We recommend that settings, visitor encounters and group sizes be adjusted from less crowded to more crowded settings incrementally over time through adaptive management, rather than up front, before recreation demand has actually materialized.</p> <p>Adaptive management strategies need to be based on comprehensive and statistically rigorous monitoring based on defined levels of acceptable change, as was done in the Jack Morrow Hills plan in Wyoming. This approach can be used to limit use of an area for primitive recreation and to limit facilities unless or until certain criteria are met – such as increased demand and a determination that more visitors can be accommodated without undermining targeted recreation values. Again, the Jack Morrow Hills plan in Wyoming is a good example of how the BLM could implement adaptive management with specific monitoring of key resources, targets for management, and triggers for action.</p> <p>We recommend that the RMP include specifics on the monitoring and metrics that will be used to evaluate successful meeting of targets for SRMAs and other recreation areas.</p> <p>We understand that experiential outcomes and setting retention are the end goals of the Benefits Based Management “Chain of Causality” (experiential outcomes result from settings and activities which result from market demand, user groups, and activities). For this reason the RMP needs to be specific about the metrics to be used for evaluating the attainment of the experiential “Outcomes.”</p>				

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	A	B	C	D
Examples of Adaptive Management responses could be: reduced marketing, smaller trailheads and parking, fewer improved trails, more challenging trails, and other ways of limiting vehicle numbers as referenced previously in the 2007 Colorado BLM IM, p. 2. In applying adaptive management, we caution against resorting too quickly to the common solution of dispersing use to other areas. This merely spreads resource impacts more broadly across the land and invites more growth, more off-trail use, more trail maintenance expense and more management and enforcement challenges over a greater expanse of land. It is not the BLM's job to indefinitely absorb an unlimited expansion in recreation demand. Setting limits on recreational use to protect BLM resources and experience will lead to other providers stepping forward to absorb increased demand.				
Permitted and Competitive events should be planned for in the RMP.	X			
Please ensure shooting areas are maintained in any plan.	X			
Quiet recreation. BLM should ensure that specific areas are designated for non-motorized recreation and that these special recreation areas are of adequate size and distance from motorized areas to provide balanced use of the resource area.	X			
Recreation plans and designated route systems determine how, when, and why people access and recreate on federal lands, and, consequently, the acres of intact core habitats, the future conditions of riparian areas and watersheds, and other natural values and experiences. The protection of visual resources, water quality, rare plants and native vegetation, wildlife habitat, hunting and fishing opportunities, solitude, and quiet will hinge, in large part, on the agency's willingness and ability to manage and reduce social and ecological conflicts. Therefore recreation planning should account for its impact on area ecology rather than just on human recreation. We encourage BLM to use this opportunity to proactively work to protect populations of special status species from potential negative impacts that could result from increased recreational use of the Gateway area, and to develop Travel Management Plan alternatives that contribute to the maintenance of viable populations of special status species.	X			
Recreation should not take precedence over other activities that will provide jobs and hence contribute to the economy. Mining, logging, and gas production activities have certain life spans and, following reclamation, future generations will be able to enjoy recreation in those areas. Livestock grazing is not a real distraction from recreational activities.	X			
Recreational Target Shooting and Hunting on Public Lands. . 1. Increase the recreational shooting opportunities especially those near population centers i.e., urban interface. 2. Business plans should be developed for management of recreational shooting areas that includes environmental stewardship, safety, operational and enforcement plans. 3. The bottom line is that recreational shooting should be managed for the following purposes: <ul style="list-style-type: none"> <li>• Protecting resources</li> <li>• Ensuring visitor safety</li> <li>• Resolving social conflicts</li> </ul>	X			

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	A	B	C	D
<ul style="list-style-type: none"> <li>Improving recreational experiences</li> <li>Increasing recreational opportunities</li> </ul> <p>4. The economics effect of land management decisions should be well documented. Partnership with local governmental agencies to create shooting parks may attract resources.</p> <p>5. To be successful, recreational shooting sites should be someplace that Mom would go to, a family friendly environment, which translates to there are toilet facilities available.</p>				
Recreational trails on public land south/ southeast of Palisade (mostly within the Grand Mesa Slopes area) are strongly encouraged by the community and this fact is echoed in our Comprehensive Plan. Several trails on the Palisade Rim and in the Horse Mountain area have been specifically highlighted as future goals. Recreation management in these areas would help ensure access, regulation and usage.	X			
Recreational Use is currently varied and needs to be maintained at current levels to keep a wider spectrum for public access to these lands. Uses such as open motorcycle riding on limited amounts of property should be maintained.	X			
Requiring mountain bike to have a Colorado OHV Registration would give more revenue, for grants that could be used to build these shared trails.		X		
RMRI supports any provisions in the Gateway RAMP that will help the BLM get control over external promotion. Until this happens it will be difficult to control the recreation use that will be attracted to Gateway. Ultimately the BLM needs to control the promotion that attracts unmanageable levels of use to its lands. The 2007 State Recreation Strategy refers on page 6 to a potential conflict between the high recreation demand generated by a “vigorous Colorado Tourism Office promotion budget” and the BLM’s “fundamental duty to meet or exceed land health standards.” “Recreation tourism demand” (p. 6) and “tourism industry promotion... sends increasing numbers of outdoor adventurers to BLM public lands,” challenging the BLM’s ability to “maintain the distinctively undeveloped and open-space character of its recreation settings” (p. 7) In response to this problem, Objective 2 in the Recreation Strategy says the BLM will “Encourage Sustainable Tourism Collaboration” with business and tourism entities.			X	
Set strict capacity limits on river boating.	X			
Settings Classification Matrix The general sequence (Chain of causality) under Benefits Based Management is that primary market and zone market niche determine settings, which support the activities, which in turn determine the experience “outcomes,” which provide the personal, community, lifestyle and economic benefits identified in the Outcomes checklist. The 2007 Recreation and Visitor Services strategy calls for maintaining the distinctive, undeveloped and open space character of BLM recreation settings that no one else can provide, that are in high demand, and that constitute the Colorado BLM’s special “niche.” Prescribing Front Country and Rural settings for lands that currently fall into this distinctive open space category, and where the existing	X			

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	A	B	C	D
condition is middle country or backcountry, is an unnecessary leap from current conditions and a departure from the Recreation Strategy. Downgrading existing settings also becomes a self-fulfilling prophecy. Setting high numbers of encounters and group sizes up front opens the door to increased use, which invites further downgrading of settings down the line. We recommend instead that settings, visitor encounters and group sizes be adjusted from less crowded to more crowded incrementally over time, rather than up front, through Adaptive Management.				
The Access Fund supports natural and cultural resource management decisions based on thorough information about the condition of field resources and visitor use. The use of baseline data is critical to making informed decisions when imposing management prescriptions to protect these resources. This RMP should clarify how such information will be gathered and a timeline developed for an inventory of natural and cultural resources and associated recreation impacts or potential impacts. Any analysis of the effects of recreational use on natural and cultural resource values begins by looking at patterns and levels of use, as well as the location and sensitivity of these resource values. Once this information has been obtained a determination may be made as to whether any management intervention is necessary for protection of that resource value.			X	
The BLM at Grand Junction Field Office should develop criteria that would guide and direct decisions on managing new climbing and bouldering routes. A first consideration for management action by the BLM should determine whether potential impacts to resources can be mitigated through climber education and outreach. The Access Fund believes the BLM should focus on responding with a reasonable lesser restrictive alternative to address resource impacts rather than area closures or regulatory restrictions on use. The BLM should also consider effective means by which it can notify the climbing public of any interim or permanent closures such as signage or media outlets. I. Education/Community Outreach A climber outreach program is a critical component to any effective climbing management initiative. Nearly all climbers will choose to “do the right thing” if they know the appropriate behavior. For example, signage educating climbers regarding Leave No Trace principles should be posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund applauds the proactive management approach taken by the BLM in this regard, but for this RMP to be successful the BLM should work with the climbing community directly to foster understanding, appreciation, respect, and a sense of ownership for the resources within the GJFO planning area. In addition to promoting a Leave No Trace ethic, the BLM should continue to do all it can to incorporate the climbing community into any management initiatives—such as raptor closures—that may affect public use of the area. By soliciting input from the climbing community directly on any proposed management initiative, the BLM will secure a key partner that can provide insight into specific resource issues and conditions, labor for building trails or other infrastructure, support for regulation compliance, and a good relationship with one of its largest user groups. Climbers have a long tradition of resource stewardship and support for natural and cultural resource protection. This tradition can be harnessed to support this BLM RMP, through consistent outreach, and an emphasis on education rather than law enforcement. We recommend that all issues pertaining to climbing at Grand Junction Field Office, including climbing use patterns,			X	

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	A	B	C	D
<p>climber traditions and history, or information about technical climbing tools and ethics, be dealt with through a climbing advisory/working group. Such a group—such as the WCCC—will facilitate gathering, sharing, and processing of information on specific issues.</p> <p>2. Human Waste</p> <p>Human waste can be a significant issue at areas that are popular climbing locations. The GJFO RMP should consider signage educating climbers regarding Leave No Trace principles posted at parking lots and trailheads to effectively inform recreational users as to acceptable human waste disposal practices. The Access Fund has found that the best way to address human waste issues in climbing areas is to inform climbers of their proven, documented impacts, and suggest alternative conduct that can ameliorate the problem. The BLM should document the extent of this impact prior to or during the implementation of the RMP so that any proposed management solutions will be based on objective information.</p>				
The BLM should recognize the need to provide a wide diversity of recreation opportunity.	X			
<p>The experiential qualities of the Gateway lands that make the area an important destination for CMC members.</p> <p>As Western Slope CMC members, we find the challenge of the undeveloped terrain to be an invigorating experience in the Gateway area. Unlike middle, or even back country settings, the remote, or primitive nature of much of this area provides an unpredictable experience in which you never know what is to happen on your hike. For example, you may encounter wildlife that is wary to roam in Middle Country, or you may find yourself having to use the orienteering and route finding skills that are developed in a group like ours. In these places, and on these adventures our members seek an escape from the urban interface, a sense of history and time stood still. Sure we seek exercise, a challenge, wildlife, and naturalness. But it is more than that, a connection many have described as spiritual. Clean air and the clean water renew us. We are calmed by the sounds of nature, by the winds whispering softly amongst the cottonwoods. We find peace as we gaze upon vistas uncluttered by man's imprint, where only the call of the hawk or eagle is heard from the sky.</p> <p>Some of our favorite destinations and the wild places we feel most strongly should be protected for quiet use are Sewemup Mesa, the Palisade, the Ute Trail and Ute Canyon within the Unaweep Citizens' Proposed Wilderness (CWP) Area, Additionally we feel the Granite Creek CWP as it is a truly remarkable and fragile landscape, as well as the Maverick Canyon CWP with its diverse terrain, petroglyph sites (at mile post 99 along Blue Creek), and the unique opportunity to witness birds of prey along the river in winter, are two areas that should be managed for quiet use and to maintain their wilderness characteristics.</p>	X			
<p>The GJFO's scoping documentation related to Special Designations in the RMP management area (Map 7.2 - Special Designation Areas) identifies that climbing in the proposed wilderness areas could be restricted by this plan, especially with regard to wilderness. The BLM's Interim Management Policies for the use of climbing fixed anchors in a WSA is more restrictive than once these WSAs become designated wilderness. The BLM's IMPs related to fixed anchors in WSAs ban the placement of new fixed anchors during this interim period. Once WSAs become designated wilderness, BLM Instruction Memo 2007-084 provides for a process to authorize new fixed anchor placements. Several concerns relate to these new restrictions and the Access Fund has long worked cooperatively through our bureau-wide MOU with</p>	X			

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	A	B	C	D
the BLM to craft reasonable polices related to climbing fixed anchors and BLM wilderness management. For more background on this longstanding issue, see <a href="http://www.accessfund.org/pdf/jointBLMfixed.pdf">http://www.accessfund.org/pdf/jointBLMfixed.pdf</a> The GJFO should ensure that the unique climbing afforded at places like The Palisade area north of Gateway and Sewemup Mesa (referenced above as the scattered climbing locations along the Dolores River and CO Highway 141 south of Gateway) are not unnecessarily restricted by WSA designation and that an effective and reasonable authorization process be established quickly for the placement of new fixed anchors. The Palisade area north of Gateway is proposed as two different Critical Resource designations: Scenic Values and Sensitive Butterflies. Beyond labels on maps, the GJFO scoping documents provide no information regarding if and whether and how the BLM might manage to protect these resources.				
The Grand Valley Open Area extends east from 27 ¼ Rd. to Mt. Garfield. Considering the huge visitor numbers this area receives, the absence of any amenities whatsoever seems irresponsible.			X	
The lands included within the Gateway Special Recreation Management Area (SRMA)Plan contain pristine wildlands, including The Palisade and Sewemup Wilderness Study Areas (WSAs), as well as significant units of the Citizens' Wilderness Proposal (CWP), including an expansion of Sewemup and the Palisade, in addition to Maverick Canyon, UnawEEP, and Sagebrush Pillows, and portions of the Granite Creek CWPs. Wilderness character must be taken into consideration as the analysis for the SRMA is conducted and should not be impaired as a result of decisions made in the final SRMA.	X			
The popularity of Off Highway Vehicles (OHVs) has increased dramatically and is expected to continue due to population growth, advances in recreation technology, increased availability of information and improved access to remote areas. EPA supports efforts to address motorized use resource damage, monitoring issues, known user conflicts, and enforcement issues. EPA also supports the transition from unmanaged motorized recreation to restricted travel. Restricted or limited travel is necessary to ensure that resources are protected and that other non-motorized recreation is accommodated. Unmanaged OHV use on federal lands has resulted in unplanned roads and trail, erosion, damage to wet meadows, soils and stream channels, and increasing degradation of recreational experiences such as horseback riding and hunting, The RMP/EIS should provide a thorough analysis of impacts from OHV use. The analysis should include prevention or mitigation of adverse impacts from OHVs to soils. watersheds~ vegetation, wildlife habitat, water quality. cultural resources and other assets of the planning and decision areas,	X			
The recreation and off road crowds brings a lot of money and revenues to towns that offer good outdoor experiences. It costs money to drive multiple vehicles and travel with them as well as have a room to stay in, food to eat, etc... This revenue can only help our local communities.	X			
The RMP may develop a national standard for OHV noise levels in a future rulemaking.		X		
The RMP will determine that decisions concerning motorized recreation on BLM lands can best made at the local level, with the full involvement of Federal, tribal, State and local governments, motorized and non-motorized users, and other interested parties.		X		



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The RMP will indicate that it may consider developing national safety standards for OHV use on BLM land sometime in the future, but not at this time.		X		
The Special Recreation Permit (SRPs) process is another realm that could be improved by the new RMP. Planning for SRPs should be programmatic to remove the continual burden from the agency and permittees to do studies for each event. The RMP should approve areas for types of events, such as motorized competition. It could even reference particular events, such as the Snakebite Hare Scrambles which has consistently been promoted by the Bookcliff Rattlers Motorcycle Club. Regarding "organized groups," the RMP should clearly define the parameters of SRPs, so groups know when they need to apply for a permit and when they don't. The RMP could set forth a streamlined process for making SRPs less onerous for all constituents. RwR recognizes the need for permits on certain kinds of events. However, the incremental rise of red-tape could be mitigated via RMP planning.	X			
The undersigned organizations recommend that the BLM determine suitable areas to be designated for pull-off parking and available for undeveloped camping opportunities. With this, all other allowances for cross-country travel for the purpose of dispersed camping should be eliminated to protect resource conditions. a) BLM visitors may park a motor vehicle within one vehicle length from the edge of the road surface when it is safe to do so and without causing damage to the public land's resource (campers walk to access a backcountry camp of their choosing), and/or b) Motor vehicles may access signed campsites via designated camp spur routes that are signed and demarcated on a travel map. The BLM, in certain places or at certain times may need to restrict dispersed camping altogether. The BLM should clearly communicate on a travel management map, available on the agency's website, and, where possible, on other visitor maps and brochures, where and how vehicle-supported dispersed camping is allowed.	X			
Interestingly, a number of our members came away from last year's public meetings remarking that it was difficult to contribute comments about the general resource needs of the landscape within the parameters of the SRMA conversation. This speaks to one of the challenges of "National Destination Market" SRMA designations for a parcel of land with such drastically different user experiences. While we certainly support the new Colorado Recreation Strategy and the general parameters of the Benefits Based Management system, it seems that SRMA designation within the "National Destination Market" framework makes it difficult to truly prioritize the values of the landscape while at the same time trying to manage for the desired recreational outcomes.	X			
There are two Special Recreation Management Areas (SRMAs) that overlap with designated Natural Areas. The Bangs Canyon SRMA encompasses Rough Canyon Natural Area/ACEC. CNAP recommends that the Rough Canyon ACEC retain a semi-primitive non-motorized designation and that motorized recreation be restricted to designated roads in areas adjacent to the ACEC. The Gateway Palisade Natural Area (which overlaps part of the BLM Palisade Outstanding Natural Area) is currently included in the Gateway Proposed SRMA. Particularly in light of the recent discovery of multiple rare plant populations in the Natural Area and surrounding lands, CNAP recommends that the Natural Area be removed from the Gateway Proposed SRMA. This removal of one of the	X			

Table E-3 Representative Comments for Recreation Management	Planning Classification <sup>1</sup>			
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<p>most botanically rich areas in the GJFO from special recreation management would still allow for primitive recreational use while assuring that its significant features are protected as a top priority. This would preserve the habitat for these rare plants and allow the further study of these recently discovered populations.</p> <p>In the event that removal of the Gateway Palisade Natural Area from the Gateway Proposed SRMA is not feasible, CNAP recommends that the Natural Area retain its semi-primitive non-motorized recreation guidelines, and that the protection of its scenic, geologic and botanical values are the top priority for management. To this end, motorized vehicles are recommended to be limited to designated roads only.</p>				
<p>There is a lot of recreation within this RMP management planning area, rock climbing in particular. In this RMP, the GJFO should provide for and protect the many recreational rock climbing and bouldering opportunities found at Rough Canyon, Bangs Canyon and bouldering along CO Highway 141 between Whitewater and Unaweep Canyon, Unaweep Canyon, The Palisade area north of Gateway, climbing locations along CO Highway 141 south of Gateway, climbing and bouldering on the southern slopes of Mount Garfield near the trailhead access from I-70, and De Beque Canyon along I-70 and its side-canyons. The GJFO should consider designating these outstanding climbing areas—especially Unaweep Canyon and the bouldering along CO Highway 141 between Whitewater and Unaweep Canyon—as Special Recreation Management Areas (SRMA) and work collaboratively with the local climbing community (especially the Western Colorado Climbers Coalition) to ensure the needs and preferences of this group are met as per the GJFO’s recreation scoping documents (“structured recreation demand from identified markets”). In establishing SRMAs the BLM should increase staffing and funding to appropriately focus on adding value to the lives of local and visiting climbers who frequent the outstanding climbing found in the GJFO RMP planning area. In addition, to ensure that these unique climbing opportunities are protected, the BLM should limit energy development in the area, develop a plan to make sure that motorized recreation does not conflict with or negatively impact low-impact recreation such as rock climbing, and inventory and plan for managing special status species and cultural resources so that any restrictions at these areas are reasonable and consistent with federal regulations and policies.</p>	X			
<p>There is a need to provide for commercial motorized tour operators. We strongly encourage the BLM to consider evaluating commercial activities, as much as possible, within the programmatic land use plan, thereby streamlining the permitting process and reducing staff workload.</p>	X			
<p>There needs to be a parking area with vault restrooms in Cactus Park. This is becoming a high use area with toilet paper everywhere.</p>			X	
<p>Tools exist for maintaining setting character. A 2007 State BLM IM cited above specifies such tools to be used for maintaining settings, stating on page 2 that: “For areas with Limited and Open categories, managers may impose several different kinds of limitations including vehicle numbers, types, use times or seasons, permitted use.....” etc.</p> <p>The notion of limiting numbers of recreation users needs to be incorporated into the adaptive management measures adopted for all recreation planning in the GJFO, particularly for portions of GJFO where growth in recreation use should not be the goal.</p>	X			
<p>Unaweep Canyon itself, both because of its high accessibility and designation as a scenic byway, requires limitations as to off-road travel,</p>	X			

<b>Table E-3 Representative Comments for Recreation Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
designated campsite location, trash disposal, and restroom facilities				
Using the language of Benefits Based Management, which emphasizes user “experience” rather than recreation “activity” or “resources,” we would like identify ourselves as representing a range of Quiet Use organizations whose thousands of members are passionate about preserving traditional forms of recreation such as hiking, backpacking, non-motorized hunting, angling, horseback riding, landscape and wildlife photography, and birding and other wildlife viewing pursuits. On BLM lands we and our members want to experience naturalness, quiet natural soundscapes, undeveloped scenery, an undisturbed natural landscape, the timelessness and geological sweep of the BLM's remote and rugged landscapes, a low level of facilities and management presence, and opportunities for uncrowded and solitary experiences. We want to be able to recreate in primitive, undeveloped, natural appearing settings. The experiences we are looking for are closeness to nature, a contemplative relationship with the natural world, savoring the total sensory experience of a natural landscape, escape from crowds, quieting our minds by escaping urban traffic and crowding, and a sense of humanity’s place in the larger universe, as well as improved outdoor knowledge, independence, self-reliance and a sense of adventure. We and our members are whole-hearted participants in these types of experiences with a keen interest in preserving for future generations these time-honored traditional experiences of the outdoors.	X			
We are concerned about loud noise from motorcycles or other off-road vehicles that may interfere with climbers communicating with one another across a cliff face.	X			
We are interested in the following issue categories: Recreation, wilderness, special designation areas, wildland-urban interface, social considerations, and public safety. Specifically, we would like the following to be considered: climbers seek an adventurous experience with some wilderness values, such as wild countryside, solitude, natural quiet, and freedom from constraints on access to public lands for the active pursuit of rock climbing and hiking.	X			
We are uncertain how the effects on recreation experiences will be considered in the decision making process. Naturally, BRC’s members and supporters are interested in a quality OHV trail system. Insofar as that can be reflected as a planning Issue, we would suggest “trail-based recreational experience” be considered.	X			
We dislike areas that do not allow camp fires.	X			
We dislike areas that take away camp sites or limit camping to an unrealistic number as has been done in Rabbit Valley.	X			
We dislike being told that ATVs scare away wildlife any more than any human on foot does when we all know it is not true.	X			
We dislike hikers and mountain bikes complaining of motor noise in a motorized use area.	X			
We dislike the irresponsible users on public lands.	X			
We generally favor managing different areas of BLM land for different uses which may be incompatible. Any Special Recreation Management Areas should keep large scale landscape planning in mind first, and require any recreational use to avoid wildlife core areas and corridors between them, in all habitat types. This is especially important for animals such as kit fox, mule deer and antelope that require large areas.	X			

<p align="center"><b>Table E-3</b> <b>Representative Comments for Recreation Management</b></p>	<p align="center"><b>Planning Classification<sup>1</sup></b></p>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
Conservation biology principles should apply in all habitat types (Sage, PJ, etc) , both between core areas of the same habitat, and across different habitat (mule deer moving up and down, seasonally).				
We like to picnic, camp, fish, hike, ATV and four wheel [on BLM lands]	X			
We recommend that the BLM assign multiple SRMA designations to the Gateway area. Specifically, we feel that the adoption of “National Destination Market”, “Community” and “Undeveloped” SRMA designations for this 198,000 acre area, will enable the public and the BLM alike to be more effective in their attempts to adequately manage the diverse values and resources of the area. Inherently, “National Destination Market” SRMA management locks the BLM into having to plan for recreation above all of the other uses of the landscape, which is far too narrow and limiting in scope for the entire Gateway area. For example, we recommend that Zone 4 be identified as a "Community SRMA" rather than a "Destination SRMA" to reflect the wishes of the large majority of users who, according to the 2007 and 2008 Gateway scoping focus groups and public comments, desire less crowded, backcountry recreation areas. Such areas would quickly lose the "community" and "backcountry" qualities they now have, once they are advertised as part of a "destination" SRMA.	X			
We recommend the plan include a field office-wide or planning area-wide moratorium on any new technologies that crop up in the future such as rhinos, segways and others, until their impacts can be analyzed under NEPA.	X			
We think that the RMP process should reconsider the substantial costs of completing some of the earlier and somewhat unrealistic plans, such as the Grand Mesa Slopes and north De Beque (Garfield County).			X	
We would very much like to see the GJFO finish the Gateway Plan, and not do it as part of the RMP. The Gateway resort and surrounding BLM lands have been discovered by the public. It is unrealistic to ignore the Gateway area for the several years it will take to complete the RMP. Perhaps the Gateway Plan could be completed concurrently with the RMP, so that implementation can begin as soon as possible.			X	
With regard to permits we recommend the management framework used for the Price plan in Utah <a href="http://www.blm.gov/content/etc/medialib/blm/ut/price_fo/Planning.Par.6224.File.dat/Appendix_14-SRP_Evaluation_Factors.pdf">http://www.blm.gov/content/etc/medialib/blm/ut/price_fo/Planning.Par.6224.File.dat/Appendix_14-SRP_Evaluation_Factors.pdf</a> which sets out factors to be considered and then ties in with the ROS approach. It is important that permitted activities not use up capacity that should more rightly be dedicated to the public.	X			
Zone I Dolores/Gateway High Biodiversity/Potential Conservation Area Lands along the Dolores River in Zone I have been identified as one of the 10 most important conservation sites in the state of Colorado, a site having “critical global significance,” having one of only five sites worldwide for two plant species, many state peripheral species and listed threatened bird, the Peregrine falcon. The site contains 13 natural heritage animals and plants and 11 CDOW Species of Concern (see 1997 “Ten Important Conservation Areas” interagency cooperative project that was mailed to you by RMRI on February 29 under separate cover). Also See: 2007 “Rare Plant Survey of Gateway BLM lands,” under CNHP on the web. Recommended setting Pristine This riparian river segment should be placed in a “pristine” setting with no trails at all or hiking trails only kept at extremely low use, to	X			

<b>Table E-3 Representative Comments for Recreation Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>protect this world heritage site.                      Desired Quiet Use Experiences                      North east stretch of the Dolores inside the CNHP PCA:                      Bird watching, identifying wild flowers and the rare plants and plant communities found there. The deep background silence to be found here- Hearing the sound of planes landing at the new airport would be discordant for this zone.                      Assurance that intensive management, similar to that done in National Parks, is allowing limited visitor experience of this beautiful, with little or no impact on this riparian zone of global significance.                      Management                      No camping or trails near the river. Any trails should be within the main road corridor.                      Reduce salt cedars and improve native vegetation.</p>				
<p>Zone 2 Dolores River                      Unawep Seep                      Recommended setting                      backcountry physical and social setting and front country administrative setting to manage high volume visitation to protect a sensitive and biological diverse area. Unawep Seep should be intensively managed (trampling, parking, gates, trash, sanitation) to protect it from visitor impacts.                      Unawep Seep should not have unprotected access but rather should be intensively managed (trampling, parking, gates, trash, sanitation) to protect it from visitation impacts.                      Dolores River                      Recommended Setting                      backcountry physical and social setting and front country administrative setting to manage high volume visitation to protect a sensitive river corridor.                      Limited or no rock climbing to protect cliff dwelling bird and canyon scenery. Cliffs have high habitat value not just for Peregrine falcon but many other bird and animals species.                      A. Protect Dolores River fisheries                      B. River otters on Dolores!!</p>	X			

Table E-3 Representative Comments for Recreation Management	Planning Classification <sup>1</sup>			
	A	B	C	D
<p>Zone 3 Palisade</p> <p>Recommended setting</p> <p>Primitive setting in the physical, social and administrative categories- wilderness designation</p> <p>Desired experience</p> <p>Primitive, unconfined, pristine wilderness experience</p> <p>Natural sounds only - no overflights nearby ! Please refer to the National Parks Service Natural Sounds Program. 97% of visitors coming to these types of pristine landscapes are coming to get away from noise</p> <p>No new mountain bike trails in Zone 3</p> <p>Restrict climbing in the Palisade</p> <p>No new trails in the Palisade – wildlife diversity and importance of maintaining habitat security</p>	X			
<p>Zone 4 Calamity</p> <p>Recommended setting</p> <p>Backcountry physical and social setting to limit crowding, encounters and group size; possibly middlecountry administrative setting if more intensive management is necessary to prevent degradation of resources near trailheads, pullout, camping areas, etc.</p> <p>Desired experience</p> <p>Enjoyable, successful hunting opportunities with only low levels of ATV use in this high quality big game hunting area. Opportunities to hunt away from the sound of vehicles. A mostly quiet soundscape with noise of off-road vehicles intermittent not continuous.</p> <p>This accords with the AZ State University Visitor Survey which showed that motorized and non-motorized recreationists alike value uncrowded, remote and primitive settings, the desired experience for</p> <p>A low volume motorized and mechanized trail experience maintaining the enjoyment of seeing and passing through rugged backcountry; well-managed moderate to low use trails providing adventure and exploration. A balance between natural soundscapes and machine altered soundscapes, allowing quiet users and non-motorized hunters to enjoy the peace and quiet of some portions of Zone 4 and at certain seasons of the year due to seasonal closures to motorized use</p> <p>Management</p> <p>Zone 4 contains some of the highest quality hunting opportunities (Hunting Unit 61) in Colorado which are being impacted by unmanaged motorized recreation and a proliferation user-created ORV (off-road vehicle) routes. Motorized recreation is appropriate in this zone if strictly limited to main arterial routes and managed with good enforcement year round and seasonal closures to protect elk severe winter range. To restore habitat effectiveness, we encourage the BLM to dramatically reduce route densities in this area by eliminating the dense networks of user-created trails and limiting motorized and mountain bike use to a few main arteries, after closing spur routes and all unnecessary and duplicative routes. Travel off of designated roads and trails should be discontinued in favor of a limited number of</p>	X			

Table E-3 Representative Comments for Recreation Management	Planning Classification <sup>1</sup>			
	A	B	C	D
<p>deliberately designated pull-outs for passing, resting, camping, etc. Close most user-created routes and significantly reduce route densities. Manage marketing to prevent ROS slippage and preserve less crowded, frontier experience. Avoid group events which make it difficult to maintain the less crowded and undeveloped settings, Gateway Scoping showed all types recreationists even motorized as preferring backcountry solitary settings. The entire Maverick Canyon CWP should be placed in a primitive setting. The Nature Conservancy S. Rockies Ecoregional Plan Unaweep portfolio site should receive maximum protection. In addition, commentor requests: C. Well enforced motorized closures in the spring, D. Need more protection of riparian. Many of the riparian zones of the small streams are in poor shape and could be improved by better grazing control. E. Protect dusky grouse, turkey, seasonal closures for all game species, dramatically reduce route densities F. Need more wild and scenic designation (more protection). G. Let abandoned routes revegetate naturally area is heavily fragmented. H. Keep wild areas intact. No mines (Maverick Canyon to Juanita Gulch). No trails.</p>				
<p>Zone 5 Sewemup Mesa Setting Recommendation – Prescribe a Primitive setting in the physical, social and administrative categories- to retain wilderness qualities. Management Recommendations – Zone 5 should continue to be managed to retain its wilderness characteristics as mandated by WSA designation. Sewemup Mesa should be designated as wilderness. A few designated parking areas adjacent to the county roads would be helpful in directing traffic. However this development should be minimal.</p>	X			
<p>Zone 6 Sinbad Recommended settings Backcountry or middle country physical and social setting, middle country administrative setting if necessary to maintain relatively quiet and undisturbed character of this zone. Desired experiences Enjoy opportunities for solitude, uncrowded trails and a primarily natural viewscape and soundscape. Enjoy an unconfined experience, being away from more crowded recreation areas, Low numbers of encounters. Enjoyable and successful big game hunting, in a minimally motorized setting.</p>	X			

Table E-3 Representative Comments for Recreation Management	Planning Classification <sup>1</sup>			
	A	B	C	D
<p>Management</p> <p>Do not designate connector motor and mountain bike trails into the Manti Las Sal National Forest to be consistent with its travel plan, also because motorized use in Zone 6 will be difficult and expensive to enforce.</p> <p>Manage Sewemup CWP extensions in Primitive setting. Otherwise retain and manage area as backcountry, physically, socially and administratively. Manage for sustainable hunting. Manage marketing to retain uncrowded backcountry, “distinctive,” “remote” settings. Manage to maintain country backcountry, rustic, pastoral uncrowded setting. We recommend the management emphasis of this zone be quiet, non-motorized recreation, birding and scenic hiking.. Designate one Jeep and one motorcycle route only, conditional upon visitor compliance with rules prohibiting resource damage and off-route travel. ATV’s are not appropriate due to distance from management centers and difficulty of enforcement at this distance.</p> <p>Again, reduced advertizing to avoid attracting visitor levels that would change the backcountry setting of this zone. Low management presence unless necessary to protect targeted uncrowded backcountry experience.</p>				
<p>Zone 7 Cone Mountain/Dolores Point</p> <p>Recommended settings:</p> <p>Backcountry physical and social setting; possibly middlecountry administrative setting if more intensive management is necessary to prevent degradation of resources and retain uncrowded, frontier experience. There should be quiet use only on the rims. Containment rather than expansion of the proliferating motorized footprint in Zone 7; existing motorized use should not be expanded, for example with long distance trails. Manage non-motorized areas for quiet use. Expand quiet use areas.</p> <p>Desired experience:</p> <p>Opportunities to hunt with minimal sound of vehicles. A mostly quiet soundscape with noise of off-road vehicles intermittent not continuous. Maintaining low motorized use levels in Zone 7, accords with the AZ State University Visitor Survey which showed that motorized and non-motorized recreationists alike value uncrowded, remote and primitive settings.</p> <p>A low volume motorized and mechanized trail experience maintaining the enjoyment of seeing and passing through rugged backcountry; well-managed moderate to low use trails providing adventure and exploration. A balance between natural soundscapes and machine noise disturbance, allowing quiet users and non-motorized hunters to enjoy the peace and quiet of some portions of Zone 4 and at certain seasons of the year due to seasonal closures to motorized use</p> <p>Management:</p> <p>Limit long-distance connecting trails. They will spread even greater numbers of users and unmanaged use into the backcountry. Manage rims and all existing non-motorized areas for quiet use!</p> <p>Control ORV noise so as not to impact a silent soundscape. Evaluate the soundscape of this zone to manage natural quiet more deliberately.</p>	X			



<b>Table E-3 Representative Comments for Recreation Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>Reduce route densities, streamline travel system to a few main arteries. Close user-created routes (blue on map). Appropriate marketing to retain rural, historic, uncrowded setting and experience.</p> <p>Manage permitted activities so as not to move Zone 7 into a more developed zone on the Recreational Settings Matrix.</p> <p>Zone 7 is being impacted by unmanaged motorized recreation and a proliferation user-created ORV (off-road vehicle) routes. Motorized recreation is appropriate in this zone if strictly limited to main arterial routes and managed with good enforcement and seasonal closures to protect wildlife. To restore habitat effectiveness, we encourage the BLM to dramatically reduce route densities in this area eliminating the dense networks of user-created trails and limiting motorized and mountain bike use to a few main arteries, after closing spur routes and all unnecessary and duplicative routes. Motorized travel off of designated routes should be discontinued in favor of a limited number of deliberately designated pull-outs for passing, resting, camping, etc.</p> <p>In addition commentor requests that:</p> <ul style="list-style-type: none"> <li>I. Uranium mining will be opening up new roads. Since habitat fragmentation is already extreme in some parts of Zone 7, recreation routes need to be correspondingly reduced!</li> <li>J. Consolidate current roads and trails into a few main arteries, enforce off-route ban, in severe winters close all routes that are conduits for human disturbance to wintering wildlife.</li> <li>K. Manage to retain the heritage and history of the area.</li> </ul>				
<p>Zone 8 John Brown Canyon</p> <p>Recommended settings</p> <p>Intensive management to protect CNHP Potential Conservation Area. Prescribe for middle country except along mining truck corridor. Front Country or Rural in administrative setting to protect resources and “rustic” setting to the extent possible in the face of heavy use</p> <p>Address safety issues of combining mining and recreation traffic on one road.</p> <p>In addition commentor requests that:</p> <ul style="list-style-type: none"> <li>L. Protect corridors and riparian areas.</li> <li>M. Maintain the remote character of the area.</li> <li>N. Limit motorized travel with signage and enforcement.</li> </ul>	X			
<p>Zone 9 Granite Creek</p> <p>Recommended settings</p> <p>Backcountry setting except for primitive (no motorized and mechanized) in Granite Creek and Sagebrush Pillows CWPs. Horse and hiking only in CWPs.</p> <p>Maintain the backcountry character and primarily undisturbed natural landscape to allow visitors to enjoy opportunities for solitude.</p> <p>Provide a very low level of facilities and management presence.</p>				

<b>Table E-3 Representative Comments for Recreation Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
Physical: Back country; Social: Primitive; Administrative: Primitive Desired experiences Opportunities for primitive hiking, backpacking, equestrian and primitive hunting in an undeveloped area Opportunities to experience silence and solitude Hiking and backpacking: Savoring the sensory experience of a natural landscape, the natural soundscape away from the mechanized and motorized sounds and sights of urban living, closer relationship with the natural world, enjoying an uncrowded experience. restoring mind from stress Enhanced sense of oneself as part of the larger world In addition commentor requests that: O. Manage backcountry portions for non-motorized use. P. Reduce motorized routes. Area has high biodiversity sensitive to proliferating ORV trails. Q. BLM should collaborate with CDOW to remove branch trout from Granite Creek R. and restore native trout. S. Manage for limited use and solitude T. Close motorized routes accessed from private property Ute Creek should be considered for re-introduction of native trout.				
Zone 10 Unawweep Protect Unawweep Seep RNA and portions of Palisade ONA. Place in a primitive setting due to steep topography, outstanding scenery and natural values and inappropriateness for motorized and mechanized use.	X			

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

Table E-4 Representative Comments for Lands and Realty / Community Growth and Expansion	Planning Classification <sup>1</sup>			
	A	B	C	D
The BLM also should encourage and facilitate the siting of wireless communications infrastructure on federal lands because it would advance significant public policy goals in addition to public safety	X			
Although it may not be possible, the fee acquisition or funding of conservation easements on some inholdings would be among the most important actions the BLM could take. Especially important inholdings include the parcel between 2.0 and 2.8 road, which has breeding burrowing owls, and any large tracts along I6 road, which is good semi desert/ prairie dog community habitat.	X			
Where necessary, an adequate fire barrier should be maintained under corporative effort by the BLM and the landowner and/or town.	X			
No industrial zoning along the river corridor				X
Federally listed plant species are afforded very little protection on private lands compared to the protections on federal lands; therefore, disposal of lands containing listed plant species could adversely affect the species. We understand that it would be infeasible to survey all tracts prior to classification for disposal in the RMP process, but request that you remove tracts that are likely to contain listed or candidate species, from consideration for classification for disposal in the RMP process. After completion of tile RMP, we recommend that all lands be surveyed for sensitive species prior to disposal, and disposals do not occur if federally listed threatened, endangered or candidate species are found.	X			
Public access to public lands should be maintained while respecting private property boundaries.	X			
Provide buffers between the urbanizing areas of the county and BLM wild lands in the form of conservation easement and open space tracts.	X			
Lands needed for community growth and expansion should be sold at market value to the appropriate entity, if the voters in that entity approve such acquisition.	X			
Disposal properties in critical environmental areas should be retained in the BLM ownership.	X			
In accordance with the MOU, the Airport and the Federal Aviation Administration (FAA) plan to submit an application for the conveyance of approximately 2,200 acres of BLM land following completion of an Environmental Assessment (EA) and a federal funding by the FAA. It is the Airport's understanding that this conveyance application will be contingent on the land being identified for disposal in the RMP. We therefore respectfully request that the updated Resource Management Plan reflect the enclosed property being transferred to the Grand Junction Regional Airport Authority for aeronautical purposes.	X			
The City of Grand Junction is interested in exploring recreational development through the Recreation and Public Purposes Act, or possibly other avenues of site management. One particular site has been identified as a potential recreational area near the Redlands Mesa Golf Course, This site could be used for a variety of purposes including shelter development and trail connectivity.	X			
Orchard Mesa Neighbors in Action is very concerned about three different areas under Lands – Disposal Parcels, particularly Areas A, B, and C as denoted on MAP I. All of these areas, comprising several parcels, provide direct access to both the Old Spanish Trail and the	X			

Table E-4 Representative Comments for Lands and Realty / Community Growth and Expansion	Planning Classification <sup>1</sup>			
	A	B	C	D
Gunnison River Bluffs areas (MAP 2). There has been tremendous recent interest and concern about both of areas that are used extensively by the public for hiking, walking, bicycle riding and horseback riding. As the region continues to grow and expand, the opportunities for such recreation will also grow and it is important to keep these areas intact for public use.				
Nothing in the RMP revokes any existing rights-of-way held by private parties or alters any treaty rights held by tribal governments.		X		
Puckett Land Company also owns land within the area covered by the Grand Junction RMP. Some of our holdings either surround BLM lands, or are adjacent to BLM lands on one or more sides. We would like to see these lands made available for disposal, preferably through direct sale to PLC. The lands that we are primarily interested in are located in Baker Gulch, north of De Beque (in sections 4, 8, and 9, T. 7 S., R. 97 W., 6th PM), and near the head of Tourist Run, west of Parachute (in section 7, T. 7 S., R. 96 W., 6th PM, and sections 13, 14, and 24, T. 7 S., R. 97 W., 6th PM). According to your Disposal Parcel map, these lands are currently identified as suitable for disposal, and we request that this designation be carried forward in the RMP revision. We will also be contacting the Grand Junction Field Office in the near future to discuss the acquisition of these parcels by PLC.	X			
Collbran derives significant economic benefits from use of public lands by area residents as well as visitors. Access to public lands is important to the community for economic, recreation and hunting benefits. Existing access should be retained and potential new access to landlocked parcels should be considered by BLM.	X			
The public utility corridor running along Hwy 50 and the Gunnison River Bluffs area is of concern. It overlaps with the "Sensitive for Public Utilities" area along the river in the Whitewater and Orchard Mesa area of the Old Spanish Trail/Gunnison River Bluffs area. Care and consideration of the trail should include participation of BLM management in development planning that is occurring near the Whitewater trail head off Coffman Road as well as the planned development of properties on Sunlight and Edlun Road that impacts the Orchard Mesa trail head.	X			
Colorado Natural Areas Program (CNAP) recommends that tracts including existing Natural Areas and occupied habitat for sensitive and listed species not be included in the proposals of tracts considered for disposal under the revised RMP. Also, we recommend that 'Potential Natural or Research Natural Areas', 'Potential Areas of Critical Environmental Concern', 'Threatened or Endangered Species Habitat Areas', 'Riparian Habitat Areas' and 'Wetland Areas' be included as types of private land that would be considered for acquisition through exchange. In particular, CNAP recommends that the GJFO evaluate private tracts that are within or adjacent to existing Natural Areas for consideration for acquisition if this acquisition would result in improved resource management of the special management areas.	X			

Table E-4 Representative Comments for Lands and Realty / Community Growth and Expansion	Planning Classification <sup>1</sup>			
	A	B	C	D
CNAP recommends that all state Natural Areas in the GJFO be categorized as 'Unsuitable' for public utility routing due to the sensitive features that occur there. If designation as 'Unsuitable' for any ACEC is not deemed warranted, CNAP recommends that that ACEC be categorized as 'Sensitive' to public utility routing and that appropriate mitigation be included as part of any utility project proposal or right-of-way grant stipulations. The following prescriptions found within the existing RMP are recommended for inclusion in the revision: "Applications for land use authorizations within unsuitable zones would be rejected, except where valid existing rights require granting of authorization. Applications in sensitive areas would be considered if mitigation measures could reduce the potential impacts of the project on the identified sensitive resource. In most cases, applicants would be encouraged to seek alternate locations when available. In all zones, use of current corridors or upgrading of existing facilities would be encouraged."	X			
Grand Junction requests further discussions with BLM to discuss the potential of exchanging City-owned lands with lands identified by BLM as potential disposal parcels or other sale/purchase arrangements to improve land management alternatives.	X			
Based on the listed plant and selenium/salt issues, we recommend that you do not consider disposal of the lands surrounding Whitewater. If you decide to continue with the disposal of these lands, we strongly recommend the use of conservation easements to prohibit adverse effects to Sclerocactus, and to prohibit future irrigation to minimize salt and selenium release.	X			
We recommend that any lands within 4 miles of a sage-grouse lek be retained in Federal ownership, and management emphasize habitat enhancement for sage-grouse.	X			
In addition, several of the parcels currently slated for disposal around Collbran, and one east of Whitewater contain potential habitat for Canada lynx. We are concerned that the disposal of these lands would lead to development that could adversely affect lynx. Most of these lands are a part of sizeable tracts that are adjacent to other public lands administered by the USDA Forest Service. We believe that BLM should recognize the value of keeping these contiguous tracts of undeveloped public land in tact for use by the public and wildlife. Therefore we recommend that you remove any lands containing lynx habitat, or adjacent to National Forest System Lands, from consideration for disposal.	X			
Consider the effects of urbanization on selenium loading in the Whitewater area: Avoid the exchange of or deed restrict the disposal properties with water restrictions (i.e., require Best Management Practices), require runoff control; and prohibit unlined ponds associated with urban development.	X			

Table E-4 Representative Comments for Lands and Realty / Community Growth and Expansion	Planning Classification <sup>1</sup>			
	A	B	C	D
The City of Grand Junction and Mesa County are currently developing a comprehensive plan to guide the City's growth over the next 20 years. This planning process is considering different growth scenarios and seeking public feedback on various alternatives. All of these scenarios showed significant conversion of agricultural lands to residential uses. A reoccurring suggestion to city and county planners during public meetings was to explore the possibility of working with the BLM to dispose of lands north of Grand Junction to encourage city growth onto non-irrigated, desert ground with little ecological, scenic, and recreational value. We suggest that the BLM explore such an alternative with the City of Grand Junction to determine its feasibility.	X			
There are several parcels of public lands identified as potential exchange parcels that are adjacent to National Forest boundaries. Of all of those parcels, there is only one with which we have any concern with BLM disposing of it. That parcel lies south of Collbran in Sections 26, 33, 34 and 35, T. 10 S., R. 95 W., 6th P.M. The National Forest System lands abutting that parcel are identified as an inventoried roadless area, and we have recently had problems with adjacent landowners building roads and trails onto the forest in that general area. Although there are no motorized roads or trails in that area, the public could still access that BLM parcel on foot or horse. If it is possible for it to be retained in federal ownership, that would be preferable from a Forest Service standpoint. There are some disposal parcels identified in the Whitewater area that I would like for BLM to consider withdrawing in the future for an administrative site for the Forest Service. I am looking for a site for a new Forest Service office or, perhaps, a site that could be used for a co-located BLM and Forest Service office. Enclosed is a map of the general area I would like to have considered.	X			
BLM has identified land tenure decisions as a major issue to be addressed in the Grand Junction Field Office RMP revision. In light of present circumstances, BLM should review the previous plans and decisions and look at future land tenure decisions with an eye towards providing adequate open space for the growing public, maintaining key viewsheds and taking into consideration new proposals for open space and trails and special management areas. Section 102(a)(1) of FLPMA requires that BLM-managed lands be retained in federal ownership unless BLM determines through the land use planning process that disposal of a particular parcel will serve the national interest. 43 U.S.C. 1701. Land tenure decisions must achieve the goals, standards, and objectives outlined in the land use plan. The BLM should work with local governments and Tribes when identifying areas where disposal of public lands may be appropriate. However, BLM should identify areas such as ACECs, citizen wilderness proposals, or sensitive species habitat for retention and acquisition. BLM should not dispose of parcels valued by local communities for their open space, wildlife habitat, and recreation opportunities.	X			
A GIS shapefile received yesterday from the BLM makes it clear that one of the proposed disposal parcels (FID # 139 on the shape labeled BLM_RMP87_Disposal_Parcel) is located in the Palisade watershed and specifically contains Cabin Reservoir, the Town's primary municipal water source. I am unsure if this is a holdout from the last RMP or if it is intended for the revised RMP but clearly must be a mistake. The Town would like the BLM to be cognizant of the fact that Cabin Reservoir has been reserved for the Town of Palisade by Special Congressional Action. Under no circumstances would the Town be willing to see development of that parcel.	X			

Table E-4 Representative Comments for Lands and Realty / Community Growth and Expansion	Planning Classification <sup>1</sup>			
	A	B	C	D
Those parcels within the larger Grand Mesa Slopes SRMA should be retained. Disposal of these parcels would significantly impact the future of the Grand Mesa Slopes SRMA, not to mention the fact that significant Rare Plant Regions are indicated upon many of those parcels.	X			
Proposed disposal parcels south of Whitewater on highway 50 should also be retained or deed controlled to continue provision of open space in the area. Failure to do so will almost certainly cause development pressures along the highway corridor which will be extremely difficult to manage in a sustainable manner.	X			
The CDOW also recommends that the BLM either retain or exchange with the CDOW specific parcels of land identified in the 1987 RMP for disposal. In general, land parcels inclusive of/adjacent to waterways and/or those which provide recreational opportunities are considered by the CDOW as priority parcels. Several specific land parcels should be retained/exchanged with the CDOW due to the historic or current presence of native cutthroat trout, and include: Coon Creek, Payne Creek, Kannah Creek, North lobe Creek, Cheney Creek, Salt Creek {Plateau Creek drainage}, Bull Creek, Brush Creek (Roan Creek drainage), Carr Creek.	X			
Require all developers to monitor mitigation components, and annually report reclamation status and success	X			
Minimize the footprint of all new development by precluding location of development on steep slope	X			
Acquisitions of areas with important resource values is encouraged	X			
The Timber Ridge/Miracle Rock area is currently a popular place for many different groups of hunters because of the large herds of elk and deer that can be found there in the fall, as well as the excellent opportunity it gives them to hunt elk or deer on foot or horseback with only a small chance of being disturbed by motorized vehicles. A proposed land trade that the BLM is currently involved in with Mountain Island Ranch has the potential to "open up" the area to public motorized recreational traffic. If the land trade occurs without a foot and horseback only travel designation it could result in a shift in elk and deer migration, lost hunter opportunity as more deer and elk in the area are pushed onto private land, and a deterioration of the resource from greatly increased off road vehicle abuse in the area.	X			

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

Table E-5 Representative Comments for Fish and Wildlife	Planning Classification <sup>1</sup>			
	A	B	C	D
<p>The Grand Junction RMP should incorporate a science-based approach to wildlife management. Given the sizable land management challenges of the coming decades, including federal land management agencies' response to climate change and the complex natural resource dilemmas associated with climate change (i.e., species adaptation, extreme variability in natural processes)—it is imperative that the BLM, the Grand Junction Field Office and this RMP employ effective and efficient science-based planning and analysis methods to support robust and legitimate decision-making processes.</p> <p>The effective application of science to land management planning and decision-making requires three “essential ingredients”:</p> <ul style="list-style-type: none"> <li>• Well-defined, measurable standards (e.g., wildlife population or habitat condition targets), developed via robust public involvement processes</li> <li>• The employment of science-based analytical tools to evaluate compliance with the standards (e.g., population viability analysis, or the spatially explicit Decision Support System recommended by the Western Governor's Association)</li> <li>• Consistent implementation of science-based analysis and decision-making (i.e., dedicated funding for monitoring and science-based adaptive management processes)</li> <li>• The adoption of a science-based approach to wildlife management, and RMP development generally, is also consistent with the agency's commitments in the Health Lands Initiative(HLI)</li> </ul>		X		
BLM should measure fragmentation that is likely to occur from proposed development and include mitigation strategies to ensure that adequate habitat and migration corridors will remain.		X		
There must be a better way to manage the deer doe versus buck population.				X
Increased numbers of big game, especially elk, is a problem on private and public land. This is particularly true in areas that historically have been deer habitat and now the deer are being pushed out by elk.				X
Consult with the Fish and Wildlife Services on the potential impacts of additional selenium loading to Endangered Fish Species and other aquatic wildlife.	X			
Wildlife Seclusion areas and sensitive habitat should be identified before alternatives are selected for the RMP. The importance of seclusion areas has become critical recently with the increased level of development in the planning area. Areas that offer this value need to be prioritized and constraints prescribed to better protect the value over time. Management prescriptions such as NSO should be in place to acknowledge their importance, or the use of COAs to better control impacts should be utilized.	X			
Reduce invasion of aquatic nuisance species by disinfecting heavy equipment, hand tools, boots, and any other equipment previously used in waterbodies prior to moving such to another waterbody. Sanitize water suction hoses and water transportation tanks (using methods described below) and discard rinse water at an appropriately permitted disposal facility. The disinfection practice should follow this outline:	X			



Table E-5 Representative Comments for Fish and Wildlife	Planning Classification <sup>1</sup>			
	A	B	C	D
Remove all mud and debris from equipment and spray/soak equipment with a 1:15 solution of disinfection solution containing the following ingredients: <ul style="list-style-type: none"> <li>Dialkyl dimethyl ammonium chloride, 5-10% by weight; Alkyl dimethyl benzyl ammonium chloride, 5-10% by weight; Nonyl phenol ethoxylate, 5-10% by weight;</li> <li>Sodium sesquicarbonate, 1-5%; Ethyl alcohol, 1-5%; and Tetrasodium ethylene diaminetetraacetate, 1-5%; and water, keeping the equipment moist for at least 10 minutes and managing rinsate as a solid waste in accordance with local, county, state, or federal regulations; or</li> <li>Spray/soak equipment with water greater than 140 degrees Fahrenheit for at least 10 minutes</li> </ul>				
Wild horse populations are, as I understand it, “out of control”. The present ban on slaughtering horses should be rescinded so that a controllable population can be maintained, similar in practice to management of deer and elk populations. This is the only way that the remaining wild horse population can be assured of adequate forage, and it is the only way that older and otherwise unfit animals can be prevented from undue suffering.				X
I do not believe these [backcountry] roads being closed will benefit wildlife, as I have seen lots of deer, elk, Bighorn Sheep, Bears, Coyotes, Foxes and Turkeys from my truck and car camp. Nor do I think wildlife is unduly impacted by well managed Oil and gas wells, logging and grazing. Or hunting and fishing.	X			
Habitat manipulation in the form of prescribed burns, roller chopping, revegetation, guzzlers, etc. would be extremely beneficial to wildlife. The CDOW would ask that habitat manipulations be given high priority through the planning process and identify large blocks of land that would benefit from this type of treatment. We also ask that habitat treatment criteria be established in the RMP to ensure that habitat treatments conducted on BLM lands are consistent with the needs of wildlife inhabiting the site (e.g., greater or Gunnison sage-grouse, etc.).	X			
The Grand Junction Resource Area supports important populations of big game wildlife. Effective protections and management actions for these recreationally, economically and aesthetically important species should be included in the RMP. In particular, mule deer winter range (the sagebrush and PJ benches at the foot of the desert) receives varying amounts of use related to winter severity and forage conditions. Pronghorn antelope are also an issue, mostly as relates to impacts to water sources, or decreases in the ability to utilize existing water sources due to increased human disturbance. Desert Bighorn Sheep are found almost exclusively on BLM and NPS managed lands in the Glade Park area. Management and monitoring of these sheep is a high priority for the CDOW and we are currently at the beginning of a 5+ year monitoring effort to try and learn more about this herd. Because of the rough terrain they occupy and other access issues, management and monitoring are difficult. The CDOW appreciates any and all support the BLM can give with regards to access, potential future habitat manipulations, and information. Rocky Mountain Bighorn Sheep are found in De Beque Canyon, as well as areas near the Sunnyside and Battlement range. Maintenance and improvement of habitat, including ensuring that increasing recreation use in wild horse	X			

Table E-5 Representative Comments for Fish and Wildlife	Planning Classification <sup>1</sup>			
	A	B	C	D
area doesn't adversely affect the sheep, is important.				
UnawEEP Seep deserves mention also as an area of high species diversity, recording the highest density of breeding birds of any BLM site inventoried in the last RMP effort. Segments of West Creek, the North Fork, and Blue Creek also provide significant riparian qualities and habitat potential.	X			
Long-term goals desired by Gateway Canyons and John Hendricks are: preservation of critical deer, elk, lion and bear habitats, especially breeding and migration routes.	X			
Make wildlife protection as a high priority.	X			
I am of the opinion that our public lands should be used- and can be used- for a myriad of public activities, like energy development and hunting. I firmly believe that the two are not mutually exclusive and can co-exist As an example, many elk habitats and hunting grounds are in areas of fast-paced energy and human development in the GJDO management area. Elk populations, in GJFO area, have increased over the last four years. Indeed, according to Colorado DOW, Data Analysis units (DAU_ E-10, E-14, and E-19 have all maintained population objectives for elk from the 1980s through the present. In fact DAU E-10 and E-19 have both seen increases in elk population numbers since 2004. In 2004, there were 3,140 elk in DAU E-19 and in 2007 that number rose to 4,380 and for DAU E-14 there were 11,570 elk in 2007 and that number increased to 15,260 elk in 2007 according to post hunting population estimates. DAU E-10 did see a slight decrease in elk population from 8,840 elk in 2004 to 7,800 elk in 2007 but these numbers are still within the population objectives set for the area. Ultimately, these post-hunt population numbers show that even in areas of energy development- of which there is a lot in both DAU E-10 and E-14- elk populations can maintain a healthy level. While elk populations have maintained, it is true that deer populations have been steadily declining since 1983. However, this trend cannot be solely attributed to the energy development in Mesa County since deer populations in DAU D-12 have declined through times of intense energy development and in years where there was little energy development. Since 2000, deer populations have steadily increased in DAU D-12. According to the DOW Grand Mesa North Heard Management Plan, deer populations finally reached populations objectives in 2004 with 26,200 deer and have increased to 27,250 deer in 2007 according to post hunt estimates in DAU D-12. Since 2004, DAU-12 has seen more development, both human and industry based yet the number of deer is increasing. With the appropriate heard management and energy development we can continue to have our wildlife co-exist with.	X			
The greasewood adjoining the semidesert shrubs is habitat for long nosed leopard lizards, and loggerhead shrikes, which are declining throughout their range. The low edge of the junipers near the Utah line are probably the state's best location for Scott's oriole. The surrounding shrub and sage areas have sage sparrows, long-billed curlews, Swainson's hawks, wintering (and apparently just to the north, breeding) ferruginous hawks, and pronghorn, in addition to the above mentioned burrowing owls, white tailed prairie dogs, and kit foxes. This area may have too many red foxes, which prey on the rarer native kit foxes. Also in the lower PJ area, gray vireos are an uncommon species. Low riparian areas-cottonwoods with a natural healthy understory (for example the forestieras along the lower Dolores) may	X			

Table E-5 Representative Comments for Fish and Wildlife			Planning Classification <sup>1</sup>												
			A	B	C	D									
have summer tanagers or Lucy's warblers, both of which are at the north end of their range, in addition to cuckoos and western screech owls.															
The Gunnison River provides an excellent opportunity for experiencing the river and natural habitat. Concern that development will contaminate the river and degrade the wildlife in the Gunnison River Bluffs area should be a priority. Assessment of development on the 166 Edlun Rd. property to determine the potential of damage to fish in the river by runoff of selenium should be done.			X												
The Gunnison River Bluffs area is designated habitat for the Peregrine Falcon and the Bald Eagle as well as Critical Habitat for the Mule Deer. They would be negatively impacted by irresponsible development and/or recreation. Efforts must be made to promote responsible recreation and maintain as much open space as possible. Land exchanges or dispersal would degrade the area.			X												
West Desert area north of Fruita, protect all remaining prairie dog colonies from any recreation or mineral or pipeline development, including entire high plains ecosystem, antelope, ferruginous hawks, rare plant assemblages, etc.			X												
Deer winter range Gateway, Dolores Point Glade Park and Uncompahgre Plateau. Seasonal closures in these areas			X												
<p>We would strongly encourage the GJFO to focus on the species and natural communities for which the GJFO is particularly important relative to a broader area such as the state or one or more ecoregions. Some of these may be BLM Special Status Species; others may not. Regardless, focusing on the species on which the GJFO can have the greatest influence can help prioritize management needs. To identify such resources BLM could complete a "regional context analysis." In its simplest form this analysis would involve comparing the number of known occurrences of a given species or natural community on GJFO-managed lands to those within the state or the ecoregion. A more in-depth analysis might compare habitats. If the GJFO contains, for example, 90% of the known locations for one species and only 5% of another, the former may warrant greater attention in the RMP. There is at least one category of species and natural communities for which all occurrences and all lands on which they occur are considered regionally significant: Globally rare and imperiled species as ranked by CNHP (i.e., G1, G2 and G3 species). We would strongly urge the GJFO to incorporate consideration of these species and natural communities into the RMP. Because these species are rare and imperiled by definition, even small populations on BLM-managed lands are considered crucial for these species' and communities' continued global viability. Any such species or plant communities on the GJFO should be considered outstanding and regionally significant resources, for which GJFO management has special importance, due to their rarity. Examples include:</p> <p>Terrestrial</p> <table border="1" data-bbox="331 1268 1562 1416"> <thead> <tr> <th>Species</th> <th>NatureServe Global Rank</th> <th>General Location</th> </tr> </thead> <tbody> <tr> <td>Gunnison sage-grouse</td> <td>G1</td> <td></td> </tr> <tr> <td>Dolores River Skeleton Plant</td> <td>G2</td> <td>Dolores River Drainage</td> </tr> </tbody> </table>			Species	NatureServe Global Rank	General Location	Gunnison sage-grouse	G1		Dolores River Skeleton Plant	G2	Dolores River Drainage	X			
Species	NatureServe Global Rank	General Location													
Gunnison sage-grouse	G1														
Dolores River Skeleton Plant	G2	Dolores River Drainage													

Table E-5 Representative Comments for Fish and Wildlife				Planning Classification <sup>1</sup>			
				A	B	C	D
	San Rafael Milkvetch	G2G3	Dolores River Drainage				
	Debeque Milkvetch	G2	Colorado River Drainage				
	Piceance Bladderpod	G2	Colorado River Drainage				
	Utah Juniper/Mountain-mahogany Woodland	G2	Colorado River Drainage				
River-related							
	Species	NatureServe Global Rank	River(s)				
	Rio Grande Cottonwood/Skunkbrush Woodland	G2	Colorado River (Segments 1 and 2)				
	New Mexico Wild Privet Shrubland	G1G2	Dolores River				
	Columbine - Eastwood Monkeyflower Hanging Garden	G2G3	Dolores River				
	Kachina Daisy	G2	Dolores River				
	Roundtail Chub	G3	Dolores River Colorado River Gunnison River				
	Consider establishing quantitative goals for maintaining key species and natural communities. Such goals could be based on any number of key attributes such as maintaining population size, or key habitat. Stating that goals would be based on an x-year running average allows for some flexibility in achieving them, which is useful since species' attributes can vary over time. A sample could be, "Maintain as undisturbed 100% of the known habitat for x, y, and z species."			X			
	Protect, conserve, maintain, enhance, and restore sustainable fisheries, particularly those communities supporting native fishes (Colorado River cutthroat trout, Greenback cutthroat trout, Colorado pikeminnow, razorback sucker, humpback chub, bony tail, roundtail chub, mountain sucker, sculpin, flannelmouth sucker, bluehead sucker, and speckled dace)			X			
	Protect, conserve, maintain, enhance, and restore native amphibians (boreal toad, Great Basin spadefoot toad, woodhouse toad, northern leopard frog, red spotted toad, western chorus frog, and tiger salamander)			X			
	Provide watershed protection for fishes and native amphibians with the following actions:			X			
	<ul style="list-style-type: none"> <li>Limit human-caused surface disturbance</li> <li>Require collection of baseline data for current, local hydrological and ecological conditions occurs (data parameters will include physical, chemical, and biological characteristics) prior to conducting/allowing surface disturbance</li> <li>Protect water quality and ecosystem integrity and function</li> </ul>						

<b>Table E-5</b> <b>Representative Comments for Fish and Wildlife</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<ul style="list-style-type: none"> <li>• Protect and maintain watershed soil stabilization and productivity</li> <li>• Meet or positively exceed soil standards on a watershed scale</li> <li>• Reduce potential for accelerated soil erosion by utilizing biodegradable erosion blankets to stabilize disturbed soil and enhance revegetation</li> <li>• Control erosion and sedimentation by repairing incised channels, and reclaiming sites of disturbance as quickly as possible to restore vegetation</li> <li>• Promote activities designed to provide long-term habitat improvement and protection, such as culvert or bridge installation and bank stabilization actions (design culvert and bridge installations such that erosion and sedimentation is minimized; and structures would function properly with anticipated water flows, and would allow for fish passage)</li> <li>• Revegetate all surface disturbance promptly with locally adapted native species preferred by wildlife</li> <li>• Manage stormwater runoff</li> <li>• Minimize fragmentation of habitat and displacement of aquatic wildlife (apply travel restrictions on routes and cluster disturbances to limit fragmentation)</li> <li>• Limit introduction and reduce spread of invasive aquatic species and noxious weeds</li> <li>• Restrict pesticide, herbicide and fertilizer use where such chemicals may inadvertently enter waterways and wetland habitats. Utilize minimal amounts of pesticides, herbicides, insecticides, and other chemicals necessary to achieve management objectives</li> <li>• Manage livestock grazing to maintain riparian/wetland corridor health (use protective fencing to exclude livestock from riparian/wetland areas; consider revisions to seasons of use, pasture rotation, deferred or rest rotation, and stocking level adjustments; consider rangeland projects (fences, ponds, etc. to direct livestock use); develop, implement, monitor, and evaluate allotment management plans annually; and utilize other BMPs for resting and deferring grazing of riparian/wetland areas)</li> <li>• Restrict grazing use on all disturbed areas (including those impacted by wildland/prescribed fire) until vegetation cover and species composition have recovered to levels adequate to support and protect watershed values</li> <li>• Rehabilitate areas affected by wildland fire and other surface disturbing activities to protect soil, water, vegetation and other resources and ensure overall watershed protection</li> <li>• Conduct high-intensity monitoring on allotments with identified issues to ensure compliance with permit terms and conditions and progress toward identified standards</li> <li>• Apply NGD/NSO stipulations within riparian zones and 300 foot corridors (measured from the outer most edge of the riparian zone L wetland habitats, and eligible WSR waterways</li> <li>• Site regularly used roads, trails, and recreational areas away from sensitive habitats and migration corridors</li> <li>• Limit road access to waterways, and riparian and wetlands habitat to as few points as possible</li> </ul>				

<b>Table E-5</b> <b>Representative Comments for Fish and Wildlife</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<ul style="list-style-type: none"> <li>• Maintain seasonal/ephemeral ponds and wetlands as seasonal and/or ephemeral</li> <li>• Maintain submerged, emergent and shoreline vegetation</li> <li>• Manage floodplains and riparian areas for protection</li> </ul>				
<p>Avoid stream channel disturbances during fish spawning, egg incubation, and fry hatching seasons. Fish spawning, egg incubation, and fry hatching times vary by elevation and temperatures, but in general the following intervals apply in Colorado:            Colorado pikeminnow: May 1-July 31 Razorback sucker: May 1-July 31 Bony tail: May 1-July 31 Humpback chub: May 1-July 31 Colorado River cutthroat trout: May 1-September 1 Greenback cutthroat trout: May 1-September 1 Rainbow trout: March 1-June 30 Brown trout: October 1-May 1 Brook trout: August 1-May 1 Sculpin: June 1-July 31 Mountain sucker: May 1-July 31 Bluehead sucker: May 1-July 31 Flannelmouth sucker: April 1-July 1 Roundtail chub: May 1-July 31 Speckled dace: May 1-July 31</p>	X			
<p>On the southwest side of the Palisade I have seen the ground covered for several acres with the beautiful Dolores Skeleton plant, <i>Lygodesmia doloresensis</i>, a Global and State critically imperiled plant ranked G1 S1 B. Because of the proximity of the huge development that will continue to attract unprecedented numbers of visitors and vehicular traffic to Gateway environs, I think this area should be closed. While monitoring the Palisade and adjoining area I found Leopard Lizard (<i>Gambelia wislizenii</i>), a species also imperiled in Co.. There are several other herp species with state and global designations in the area as well.</p> <p>Colorado Natural Heritage Program has an extensive list of all species of special concern found in this area. I commend the GJFO for arranging a CNHP botanical survey in 2007 and for being proactive in protecting rare plants.</p> <p>The cottonwood stand that is along 4.1 Road west of Gateway and downstream from the Hwy 141 bridge a half to three-quarter mile (T51N, R19W, Sec. 16 NESW) is an area in critical need of protection. It's on the west-southwest side of the river. The importance of this area might be overlooked since this public land doesn't reach the river but it is indeed important public riparian habitat. It is BLM's best cottonwood stand on the Dolores River in the area of the Grand Junction Field Office. Lucy's Warbler, an avian species new to Colorado was discovered here in 2008. The list of regular birds, both nesters and migrants, is impressive. With some conversion of understory from salt cedar to Gooding willow, yellow-billed cuckoos might return to nest there. This majestic stand is already overrun with cattle and ATVers and the adjacent landowner, John Hendricks, has put a sewage treatment plant there. Without ACEC or some other protection, wildlife will not be able to utilize this stand.</p> <p>B-ranked occurrence of G1G2S1 <i>Forestiera pubescens</i> shrubland along the Dolores River west of Gateway. This is the most heavily utilized stretch of the Dolores River in the FO by breeding avian riparian species. I have seen insects here I have never seen elsewhere. Access should be limited to protect the <i>Forestiera</i> ecosystem.</p> <p>The ponderosa pine stands at the head of John Brown Canyon and north and south of it harbor the FO's only breeding populations of ponderosa pine avian species and should be given special protection such as ACEC or at least some commitment not to log them. These are the only ponderosa pine stands in the FO, and may be the only BLM ponderosa stands in Colorado. They deserve maximum</p>	X			

Table E-5 Representative Comments for Fish and Wildlife	Planning Classification <sup>1</sup>			
	A	B	C	D
protection. Of course the peregrine eyrie sites along the walls of the Dolores River and the east side of Sinbad Valley need to have protections against trail formation immediately above them and against establishing rock climbing sites. Unawep Seep is the area which had the highest density of breeding birds of any BLM site inventoried for the last RMP effort. Protection here is warranted as well.				
The revised Grand Junction RMP should provide adequate protections for parts of the west desert area – north of Fruita and west to the state line – where remaining white-tailed prairie dog towns support a host of birds and other species. Motorized use, and in some cases non-motorized use, should be restricted in order to minimize disturbance to these fragile communities. This is needed to ensure that habitat remains for burrowing owls (whose populations appear to have declined significantly in recent years), ferruginous hawks, pronghorn, kit fox and rare plant assemblages.	X			
Include the following in RMP development (maps provided by commentor): CNHP Potential Conservation Areas, CNHP Element Occurrences, Existing and Potential ACECs, Elk severe winter range Pronghorn severe winter range, Big Horn Sheep concentration areas, Mule deer severe winter range, Mule deer movement corridors, Kit fox areas, White Tailed Prairie Dog reintroduction areas, sage-grouse areas, Bald eagle range, Peregrine falcon nesting sites, Road densities by watershed, PCAs, EOs and ACECs , Elk movement corridors, Elk, mule deer, big horn sheep, turkey, sagegrouse habitat areas, Peregrine and eagle sites, pheasant and wild turkey, Citizen Proposed Wilderness (CWPs).	X			
... I was surprised to find that the Grand Valley BLM lands, north of the Highline Canal and the far west end of the GJFO and state, apparently have most of the remaining burrowing owls on the west slope. As you know the BUOWs are totally dependent on white-tailed prairie dog (WTPD) colonies, as are several other species. I found only one owl south of the canal, and don't expect them to ever come back to the private land south of the canal. They were surprisingly spread out along WTPD towns, from the designated ORV area northeast of the airport out to the county road on the state line, generally becoming less common farther north where it is a little higher, rockier, shrubbier and wetter, and seemingly less common near noisy compressors and other development...	X			
Diverse aquatic species and habitats exist within the designated Planning Area. Native fishes (flannelmouth sucker, bluehead sucker, speckled dace, sculpin), sportfishes (rainbow trout, brown trout, brook trout,) native amphibians (western chorus frog, tiger salamander, Great Basin spadefoot toad, woodhouse toad, canyon tree frog, and red spotted toadL and special status aquatic species (federal and state-listed species, and species of special concern: Colorado River cutthroat trout, Greenback cutthroat trout, Colorado pikeminnow, razorback sucker, humpback chub, bonytail, roundtail chub, mountain sucker, boreal toad, northern leopard frog) occupy waterways, as well as riparian and wetland habitats. We encourage the BLM to manage all BLM lands and activities to ensure the protection, conservation, enhancement, and restoration of aquatic species and their habitats.	X			
The Division of Wildlife appreciates the steps that have been taken to improve Bighorn sheep habitat in the area north of Collbran and Mesa, including the removal of a grazing allotment in Atwell Gulch. This area has seen recent increase in usage by Bighorn sheep. Creation of the Atwell Gulch Area of Critical Environmental Concern along with a No Surface Occupancy stipulation, will protect and ultimately	X			

<b>Table E-5 Representative Comments for Fish and Wildlife</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
improve a large portion of Bighorn sheep habitat.				
Habitat manipulation in the form of prescribed burns, roller chopping, revegetation, guzzlers, etc. would be extremely beneficial to wildlife. The CDOW would ask that habitat manipulations be given high priority through the planning process and identify large blocks of land that would benefit from this type of treatment. We also ask that habitat treatment criteria be established in the RMP to ensure that habitat treatments conducted on BLM lands are consistent with the needs of wildlife inhabiting the site (e.g., greater or Gunnison sage-grouse, etc.). Guzzlers are an effective management tool which allow for collection of water in areas where perennial water sources are limited or non-existent. The Division of Wildlife requests the assistance of the BLM in identifying areas appropriate for guzzler placement. The BLM on Glade Park has been proactive in habitat manipulation and has worked closely with the CDOW on many projects. Pinyon/Juniper management and sage brush manipulation have been the focus of most projects. The CDOW appreciates the good relationship that both agencies have fostered and looks forward to working as partners on future projects. Future project areas to focus habitat manipulation efforts include Ryan's Park and the Spring Creek areas. Setting aside money for maintenance of rollerchops, especially within the first five years, is encouraged.	X			

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed



Table E-6 Representative Comments for Special Designation Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
The designation of Heritage Areas is a new and unprecedented expansion of agency authority. There is no statutory or executive authority for such a designation. This new designation implies a new category of use limitations and restrictions, and the material supplied by the GJFO does not answer that implication. We hope this new restriction on public access is dropped from consideration in all alternatives. Cultural resources are already protected by the Archeological Resources Protection Act. We see no need for a local designation that would add yet another layer of land use restrictions.	X			
The descriptions of the Heritage Area locations seem to coincide with the presence of T&E plants. We can see no rational connection. Like cultural resources, rare plants already have protection.	X			
Both FLPMA and the BLM's ACEC Manual (1613) emphasize the BLM's important duty to designate and protect Areas of Critical Environmental Concern. For example, FLPMA states: he Congress declares that it is the policy of the United States that - ... regulations and plans for the protection of public land areas of critical environmental concern be promptly developed...FLPMA Title I Sec. 102(a) [43 USC 1701] The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. FLPMA Title II Sec. 201(a) [43 USC 1711] In the development and revision of land use plans, the Secretary shall - ... give priority to the designation and protection of areas of critical environmental concern....FLPMA Title II Sec. 202(c) [43 USC 1712] Therefore, ACEC designation and protective management are supposed to be a high priority within the BLM's mission. ACEC designation provides an important mechanism for the BLM to actively conserve and recover imperiled species so that the protections afforded by the Endangered Species Act and the designation of Critical Habitat are less necessary. Choosing not to conserve ACECs may contribute to the need to list species under the Act, and is inconsistent with the BLM's special status species obligations.	X			
Designate ACECs and/or WSRs for waterways within critical habitat	X			
Such designations should not take precedence over other activities that will provide jobs and hence contribute to the economy.	X			
Continue to seek designation of the Dominguez/Escalante Canyons as wilderness and National Conservation Areas	X			
Continue to seek Wild and Scenic River designation of the selected sections of the Colorado and Gunnison Rivers.	X			
I support the feasibility study plans for the Gateway Wilderness Area and other proposed Wilderness Areas, the plans to create riparian study areas and the eligibility study for the Wild and Scenic River segments outlined in the plan...	X			
Ponderosa stands in the vicinity and at the head of John Brown Canyon provide for the northernmost range of Grace's warbler and are deserving of ACEC or special protection. Certainly, the Palisade area reflects high environmental characteristics, but there are numerous other areas throughout the RMP that are deserving of such designation as well, including Granite Creek, Kings Canyon, and Maverick Canyon.	X			

Table E-6 Representative Comments for Special Designation Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
Granite Creek is definitely worthy of immediate protection and oversight, as subtle incursions into that area portend an impending loss of natural values	X			
[Geographic area particularly values]The Old Spanish Trail from the Whitewater trailhead to the Orchard Mesa trailhead. 1. The area is valuable as a significant, non-renewable historical resource. This resource is and can be used by researchers, historians, archeologists, botanists, biologists, elementary, high school and college students, writers, tourists and community members. 2. The area demands further investigation of recorded easements and rights of way (43 U.S.C. Section 932) 3. The area demands further formal investigation to determine the presence of endangered species such as the short homed lizard (already sighted and photographed on the trail) and the Uinta Basin hookless cactus. 4. The area demands further archeological research as evidence of historic trail manmade rock structure is evident (visible at approx 2.4 m from OM trailhead). 5. Potential for managed development that preserves the trail, intact, and promotes it as a positive aspect and investment opportunity for homeowners thereby improving land values and tax base. 6. The area has potential as a tourist attraction for hikers, mountain bikers, birders, history buffs and others. Local entities such as the BLM, the Riverfront Commission, Museum of W. Colorado, the City of Grand Junction and Mesa County would be welcomed to coordinate with organizations that would help popularize this resource. Supportive organizations would include: The Old Spanish Trail Association, local OST A chapter, the Natl. Trails Training Partnership, Natl Trails System, and the Colorado Mountain Club. 7. The area is valuable for its natural beauty. The viewshed includes vistas of the San Juan Mountains, the Uncompahgre and Glade Park, the Gunnison River, the Colorado National Monument, the Book Cliffs, the City of Grand Junction, Colorado River and the Grand Mesa. 8. The low noise level and safety of the area are valuable. There is no hunting in the area and motor vehicles are not allowed therefore safety and low noise are integral to the trail.	X			
Please work to change State Highway 139's classification in the area N. of Loma, before Douglas Pass...it is truly not a scenic byway.	X			
New special designations should be carefully considered because of the effects it could have on future natural gas production.	X			
It IS far better to seek out industry partnerships to protect and enhance the natural land opposed to special designations and restrictions.	X			
long-term goals desired by Gateway Canyons and John Hendricks are: The eventual creation of a large National Conservation Area which could include the Palisade WSA and the Sewemup Mesa WSA along with other tracts of land that are of special recreational, visual, cultural, ecological and paleo value. A National Conservation Area in the Gateway locale would allow for careful management of this very special area for recreational, Cultural, ecological and paleo pursuits.	X			
I am strongly opposed to the consideration of the Delores River and any of its tributaries for consideration as Wild and Scenic Rivers.	X			

Table E-6 Representative Comments for Special Designation Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
The Delores is not free flowing. The flow is determined by the irrigation needs of down stream agriculture. This is not to imply that it is without value as a recreation and scenic resource, but that we object to the imposition of land use restriction similar to those of designated Wilderness without congressional approval. This may be the case if the subjective measure of "Outstanding Remarkable Values " were used to determine the suitability of the Delores.				
We would like to recommend the designation of two new back country byways. The designations will direct attention to the outstanding recreation experiences as well as facilitate funding opportunities from federal, state and outside sources. The two byways are the Tabaguache Trail and the Gateway Byway. The Tabaguache Trail is the present alignment (modified to include the new connector segment). The Gateway Byway would include the Niche Road (Mesa County 6.3) and the John Brown Road to the Utah border.	X			
None rivers were eligible for Wild and Scenic Status in the last review, and nothing has changed to make them eligible now.	X			
I think at least two of the areas in the North and West Desert areas are excellent candidates for ACEC status. These two areas are shown on attached maps. Preserving these areas would protect some of the best remaining habitat for numerous species. The flat areas near I8 and Q.5 Rds north of Fruita have some of the best WTPD habitat on the west slope and had several nesting BUOW in 2008. These low desert areas also have golden eagles, northern harriers, pronghorns, wintering ferruginous hawks, and could have kit foxes or Long-billed curlews. The adjoining greasewood has loggerhead shrikes and could have long nosed leopard lizards. The area along the Utah border, north of highways 6 and 50, has all of he species mentioned above, plus some others in adjoining habitat types. The Brewster's Ridge junipers have Scott's oriole and pinon jays. The west area seems to be the GJFO's best kit fox habitat, and has had curlews documented at least twice. It could be used to connect higher kit fox habitat to the north in Prairie Canyon and near the Demaree WSA with the lower desert kit fox habitat in the WTPD towns along the state line and on both sides of Brewster's Ridge. In this case it would better protect pronghorns, and include breeding long eared owls, Swainson's hawks and ferruginous hawks. The south end of this area has already been used by the BLM as a prairie dog receiving site and for kit fox escape and den structures. It is also mapped by BLM as a rare plant region. If the Prairie Canyon /West Salt Creek area isn't included as an ACEC, it-and much of the Mitchell Rd. area between Hwy I39 and Baxter Pass Rd (mule deer, pronghorn, and WTPD)- could be a Special Management Area for wildlife. There are other areas farther east that have such good WTPD and BUOW that they should be protected, especially through travel management. A few of these, between 25 and 27 ¼ Rds (low, flat area both sides of powerline road, west of water tank), along 25 Rd (both sides of road at 2nd/north powerline), and between 21 and 25 Rds just north of Highline Canal (From Hunter Wash to the small wash, east of Persigo Wash, between the two powerlines), are shown on the final attached map. These areas need to have some redundant trails closed and more enforcement to prevent cross country motorized travel. Fencing motorized travel out of some areas has worked in this area, but fences along busy roads might increase owl-vehicle collisions. The ACECs should have strict travel management, although no widely used roads would have to be closed. Vegetation should be	X			

<b>Table E-6 Representative Comments for Special Designation Areas</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>managed using the best available science, for these species. Non native species, including red fox and weeds should also be controlled as much as possible. Although some areas already have energy development, damage from roads and other energy uses should be minimized as much as is still possible and there should be no new roads or surface occupancy in WTPD towns.</p> <p>Additional ACECs and/or increased protection for wildlife habitat are also warranted in other habitats, including cottonwood riparian habitat (lower Dolores), sage (any large areas of natural sage habitat, especially if it can support either sage-grouse species), or large core areas of old growth vegetation in pinon juniper or any other habitat type.</p>				
<p><b>Oil and Gas Leasing</b></p> <p>Assign all ACECs that do not have oil and gas leases that pre-date the establishment of the ACEC, or that have oil and gas leases that are scheduled to expire, to the ‘Closed for Leasing’ or ‘Open to leasing with Stipulations- No Surface Occupancy’ categories. These assignments would assure that future oil and gas development in the most sensitive areas of the GJFO would not result in the long-term degradation of irreplaceable natural features such as rare species populations, pristine ecosystems, valuable fossil, geologic formations and undisturbed aesthetics. Of the eight Natural Areas, only Pyramid Rock and Badger Wash are currently authorized for leasing; (parts of the Palisade ONA outside of the Natural Area are leased); these areas comprise only 2432 acres but are extremely important for the protection of several sensitive and listed plant species. Hence, assigning all ACECs to the ‘Closed for Leasing’ or ‘Open to leasing with Stipulations- No Surface Occupancy’ categories would result in a very low impact on oil and gas development while providing for the protection of highly significant natural features.</p> <p>CNAP understands the need to manage for multiple uses, and therefore does not necessarily recommend assigning all ACECs to the ‘Closed to Leasing’ category. It is our belief that current oil and gas technology such as directional drilling can allow for development in areas adjacent to certain ACECs in a manner that would still protect sensitive features from direct ground disturbance. The following ACECs are recommended for assignment to the ‘Open to leasing with Stipulations- No Surface Occupancy’ category:</p> <ol style="list-style-type: none"> <li>1. Fruita Paleontologic</li> <li>2. Gunnison Gravels</li> <li>3. Rabbit Valley</li> <li>4. Rough Canyon</li> </ol> <p>However, for certain features that occur in ACECs, such as rare plant populations, degradation of the habitat directly adjacent to the ACEC may compromise the integrity of the sensitive feature. Secondary impacts such as noxious weed invasion, fugitive dust and fragmentation may reduce the viability of rare plant populations and result in unintended degradation of sensitive features. For this reason, CNAP recommends a ‘Closed to Leasing’ assignment for the following ACECs:</p> <ol style="list-style-type: none"> <li>1. Pyramid Rock</li> <li>2. Unawweep Seep</li> </ol>	X			

Table E-6 Representative Comments for Special Designation Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
<p>3. Badger Wash Uplands</p> <p>4. Gateway Palisade</p> <p>Since the Colorado Natural Areas Program is the only state agency that is mandated to work on rare plant protection, we would also like to submit a set of Best Management Practices (BMPs) for oil and gas development in areas with rare plants (see attached). These BMPs have been developed by a group of federal, state and non-profit representatives that collaborate on the Colorado Rare Plant Conservation Initiative. We believe there may be potential to include some or all of these BMPs in the lease stipulations that currently occur in Appendix E of the RMP, particularly under #13, 'Threatened and Endangered Plant Habitat Stipulations'. The inclusion of some or all of the rare plant oil and gas BMPs in lease stipulations would allow for oil and gas development with limited impacts to sensitive and listed species, and would assure that Natural Areas with rare plant populations do not become refugia for species that may be impacted by oil and gas development.</p>				
<p>Close all existing ACECs to mineral material sales and free use permits to assure that surface disturbance does not have adverse affects on sensitive natural features. In particular, the Gunnison Gravels Natural Area should be closed to this activity due to the geologic importance of the surface material that occurs on the site.</p>	X			
<p>CNAP recommends retention of the VRM Class I designation for the Palisade, and parts of the Rough Canyon ACEC, to retain the existing character of the landscape that appears unaltered by man. We also recommend consideration of VRM Class II or III designation for all remaining ACECs.</p>	X			
<p>CNAP would like to point out four areas on BLM property that have been considered for special management area designation in past RMPs and that are on CNAP's identified list of potentially suitable Natural Areas within the GJFO:</p> <p><u>Sinbad Valley</u>, approximately 10,000 acres under BLM ownership</p> <p>Portions of Sinbad Valley that occur on BLM property contain a broad oval depression that is the exposed core of a breached anticline. As the salt (halite) layer in the center of the anticline was exposed to weathering and quickly dissolved, the entire structure collapsed on itself, leaving a valley floor ringed by faults and inward-facing escarpments on the valley rim. Rocks exposed in Sinbad Valley range in age from Pennsylvanian in the lower slopes and valley floor, to Lower Cretaceous in the upper part of the outer rim. The rim includes dramatic exposures of Wingate and Entrada sandstones. Additionally, recent rare plant surveys have mapped populations of the newly described and extremely rare <i>Cryptantha gypsophila</i> in the Sinbad Valley area.</p> <p><u>Cactus Park Footprint Locality, 10 acres</u></p> <p>This small gully in Cactus Park about half a mile southeast of the Gunnison Gravels Natural Area contains several 190 million-year-old theropod (meat-eating) dinosaur trackways with more than 128 known footprints.</p> <p><u>Juanita Arch, 1000 acres</u></p> <p>Juanita Arch is the only true natural bridge in Colorado. It is a very young meander-type bridge eroded through a large fin of Wingate</p>	X			

<b>Table E-6 Representative Comments for Special Designation Areas</b>	<b>Planning Classification<sup>1</sup></b>			
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<p>Sandstone. Other geologic features included in the site are entrenched meanders, lungfish burrows (trace fossils), hanging falls, and potholes. A population of <i>Astragalus linifolius</i> (BLM Sensitive Species) also occurs on the site. As Colorado's only true natural bridge, this site should be recognized as being of statewide significance.</p> <p><u>Rattlesnake Canyon, 2,270 acres</u></p> <p>Rattlesnake Canyon, adjacent to Colorado National Monument, contains the largest concentration of natural arches in the world outside of Arches National Park. Plant communities of limited distribution in Colorado occur on the site: Utah juniper/Salina wild rye and Utah juniper-Pinyon pine/Mountain mahogany-Salina wild rye. A rare plant species, <i>Lomatium latilobum</i> (BLM Sensitive Species), and an uncommon species of butterfly, <i>Papilio indra minori</i> (Minor's Swallowtail), are known to inhabit the area. Dinosaur fossils are abundant. CNAP recommends that the GJFO take the significant values of these areas into consideration when drafting the RMP revision.</p>				
<p>First and foremost, CNAP recommends that the BLM retains the special management area designations for all existing Natural Areas within the Grand Junction Field Office. These eight sites were originally given special designations to provide special management that would protect and prevent irreparable damage to significant natural features. CNAP recommends that the revised RMP specifically mention the values of these sites and include management prescriptions that would assure they are protected under the new management plan. CNAP would also like to see the revision of the RMP reflect the components of each agreement as stated in the Articles of Designation of each Natural Area. Colorado Natural Areas with special protection include:</p> <p>Badger Wash Natural Area, 1,904 acres, Fruita Paleontologic Natural Area, 280 acres, Gateway Palisade Natural Area, 2,569 acres, Gunnison Gravels Natural Area, 5 acres, Pyramid Rock Natural Area, 528 acres, Rabbit Valley Natural Area, 280 acres, Rough Canyon Natural Area, 2,695 acres, Unaweep Seep Natural Area, 36 acres</p>	X			
<p>We have reviewed your draft eligibility report for the Wild and Scenic Rivers designation. In general we fully support the designation of any stream segments as wild and scenic. We are particularly supportive of designation of the Colorado and Gunnison rivers as wild and/or scenic. It is our understanding that if, based on your recommendation, congress were to designate segments as wild and/or scenic, it would be helpful in protecting the free flowing nature of these segments. This could be beneficial to the four listed Colorado River fishes and their designated critical habitat. We also noticed that you reviewed Roan and Carr creeks for eligibility and recognized that the cutthroat trout populations in these creeks are important but you were unsure whether the fish populations qualify as Outstandingly Remarkable Values (ORVs) as defined by the Wild and Scenic Rivers Act of 1968. The fish populations in these creeks have long been thought to be Colorado River cutthroat trout. BLM is a signatory to the Conservation Agreement for Colorado River cutthroat trout, and has agreed to protect populations of these species. Recent genetic work has suggested that the trout in Roan and Carr creeks are actually greenback cutthroat trout. Greenback cutthroat trout are a Federally listed threatened species, and it is required by the Endangered Species Act of 1979 as amended, that BLM (and all Federal agencies) use their programs in furtherance of the act (to protect and recover listed species). The BLM Manual 835lfor Wild and Scenic Rivers states that fish can be an ORV and, "Of particular</p>	X			

Table E-6 Representative Comments for Special Designation Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
significance may be the presence of ... populations of State, federally listed, or candidate threatened and endangered species. Therefore, because it is necessary for BLM to protect these stream segments from impacts that may adversely affect the fish, we encourage you to further explore the possibility that these creeks may be eligible for designation based on the fish being ORVs, and to explore other avenues to protect these populations in case they are not designated.				
<p>...Prior to submitting these scoping comments, we submitted an inventory of areas suitable for wilderness designation (citizens wilderness proposal – or CWP), which we have proposed for protection as new WSAs and/or through management of their wilderness characteristics. We also encourage the BLM to use designation of special recreation management areas and areas of critical environmental concern to protect natural values and, at this point, have identified six areas that we propose for special management as part of an overall management approach to creating, enhancing, and protecting quiet recreation experiences, protecting critical species habitats, and providing needed expansions of protections around current WSAs, ACECs, and SRMAs. Many of the values in these areas are already described in detail in the CWP submission and will be discussed in the context of these additional proposals in our subsequent submissions. In summary, the six proposed areas and designations are:</p> <ol style="list-style-type: none"> <li>1) SRMA in the area around Granite Creek, Sagebrush Pillows, and Palisade CWPs, which would permit backcountry hunting along with other quiet recreation uses.</li> <li>2) SRMA for backcountry recreation in the area around East Palisade, Maverick, and Unaweep CWPs.</li> <li>3) SRMA for backcountry recreation in and around Sinbad Valley.</li> <li>4) ACEC incorporating an area that borders Bangs Canyon and Dominguez North CWPs, which would protect important cultural resources (Northern Ute heritage sites) and also provide quiet recreation opportunities.</li> <li>5) SRMA in the areas surrounding parts of the Demaree WSA for backcountry recreation, which would also support wildlife winter range management and protections, as well as restoration of vegetation restoration.</li> <li>6) ACEC/Outstanding Natural Area incorporating South Shale Ridge and Cow Ridge CWPs and certain surrounding areas to protect their biodiversity, as well as providing for quiet recreation, supported by the roadlessness of the area.</li> </ol> <p>We will submit expanded proposals, including more detailed descriptions and management prescriptions, in the near future and look forward to discussing these proposals with you.</p>	X			
<p>The BLM's draft wild and scenic eligibility determination appropriately finds certain segments eligible and thus advanced for further study and specifically for suitability analysis. In particular, the draft inclusion of select segments of the Colorado River, Gunnison River, Dolores River, Little Dominguez Creek, Big Dominguez Creek, East Creek, West Creek, Ute Creek, Blue Creek, North Fork West Creek, and North Fork Mesa Creek is welcome and appropriate.</p> <p>The BLM should, however, reconsider additional segments for eligibility and thus for additional study, including:</p> <ul style="list-style-type: none"> <li>• West Salt Creek and Demaree Canyon Creek, especially as associated with wilderness characteristics and with other natural</li> </ul>	X			

<b>Table E-6 Representative Comments for Special Designation Areas</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>and ecological values of the Demaree Wilderness Study Area;</p> <ul style="list-style-type: none"> <li>• Fish Creek, especially as associated with wilderness characteristics and with other natural and ecological values of The Palisade Wilderness Study Area;</li> <li>• Cottonwood Canyon Creek, Spring Creek, Coal Canyon Creek, and Jerry Creek, especially associated with wilderness characteristics and with other natural and ecological values of the Little Book Cliffs WSA;</li> <li>• Bangs Canyon Creek, especially as associated with the wilderness characteristics and with other natural and ecological values of the Bangs Canyon citizens' wilderness proposal; and</li> <li>• Granite Creek, especially as associated with the wilderness characteristics and with other natural and ecological values of the Granite Creek citizens' wilderness proposal.</li> </ul>				
<p>In a broader context, the criteria for eligibility evaluation are clear. The Department of the Interior's Bureau of Land Management Manual chapter "8351 –Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management (BLM Manual). Section .31A of that manual states: Basis for Determination. To be eligible, a river segment must be "free-flowing" and must possess at least one river-related value considered to be "outstandingly remarkable." These factors are summarized in Illustration I. No other factors are considered in determining the eligibility of a river segment. All other factors are considered in determining suitability." (emphasis added)</p> <p>Since more detailed management decisions about stream segments would be made later in the suitability determination phase, as part of the current RMP revision or in subsequent amendments, it makes sense to list as eligible all segments that have any variation of the primary eligibility criteria, including even one outstandingly remarkable value. When in doubt, include them as eligible.</p> <p>Further, the BLM must disclose the scope of the outstandingly remarkable values (ORV) inventory process used in the draft eligibility report, and the BLM must extend that analysis to include all stream-related ORVs and study corridors wide enough to incorporate those ORVs. We note that some past wild and scenic have relied too heavily and arbitrarily on a one-quarter-mile "buffer" around identified segments in its initial identification of ORVs. BLM guidance is clear that such a "buffer" is not the appropriate measure for an ORV's association with a river. For example, ORVs can "owe their location or existence to the presence of the river" (IM 04- 63 196), a standard on which it would be arbitrary for BLM to place a numerical value. We are concerned that if BLM uses this arbitrary buffer, the agency will overlook significant ORVs that are tied to a segment.</p> <p>Geologic and scenic ORVs, as examples, could easily extend or originate from distances greater than one-quarter-mile from a segment. In an arid western slope climate, important cultural and historic values that are directly tied to segments used as water sources and migration routes for historic human populations are likely to exist a variety of distances from a segment yet "owe their location or existence to the presence of the river." Id. With vast amount of BLM land having never undergone formal cultural survey, it is important that BLM employ generous and inclusive boundaries in their inventory.</p>	X			



Table E-6 Representative Comments for Special Designation Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
Strongly in support of the findings of eligible Wild and Scenic River segments.	X			
The CDOW recommends that BLM apply specific designations (ACEC and/or Wild and Scenic River) and/or constraints (NGD/NSO, SSR/CSU, TI, and BMPs) as determined by stakeholders, when and where possible, to protect and perpetuate special status species and their respective habitats. Specifically, we propose the BLM consider those portions of Roan Creek, Carr Creek, Collier Creek, East Hawxhurst Creek, the lower Gunnison River, and the lower Colorado River that are adjacent to and/or managed as BLM land, as eligible for suitability studies to determine potential designation as Wild and Scenic Rivers (WSRs). Further, we recommend that, upon eligibility approval by the BLM, the BLM not allow any surface-disturbing activities (apply SSR/CSU) along these waterways until suitability analyses are completed. The SSR/CSU would remain in place should the BLM determine these waterways are suitable as WSRs. Should eligible WSR segments be found not suitable for WSR designation, then NGD/NSO stipulations should be applied. Further, if the CDOW determines presence of special status aquatic species in other waterways in the future, the CDOW requests the BLM apply SSR/CSU stipulations along these waterways until suitability analyses are completed. The CDOW manages and designates portions of Roan and Carr Creek drainages for genetically pure Greenback cutthroat trout (a federal and state listed Threatened species). The CDOW performs successful spawn-take operations in these drainages, utilizing such to develop hatchery broodstock. Successful rearing of these fish in the hatchery results in stocking pure cutthroat trout in core conservation waters of Colorado. Additionally, the US Forest Service (USFS) recently collected native cutthroat trout in East Hawxhurst Creek on USFS land, just above the USFS-BLM boundary. Genetic samples were collected, but analyses are pending at this time. Morphological characteristics indicate these fish may be genetically pure Greenback cutthroat trout. The CDOW manages the lower Gunnison and Colorado Rivers within the Planning Area for native, listed and non-listed aquatic species. The U.S. Fish and Wildlife Service (USFWS) designates both sections of these waterways as critical habitat for the Colorado pikeminnow (federal listed Endangered, state listed Threatened), razorback sucker (federal and state listed Endangered), bonytail (federal and state listed Endangered), and humpback chub (federal listed Endangered and state listed Threatened). Native, non-listed fish species sympatric with the listed fish species include the flannel mouth sucker, blue head sucker, roundtail chub (designated a state Species of Special Concern), and speckled dace. These portions of the lower Gunnison River and Colorado River also provide outstanding, scenic and recreational boating opportunities. The CDOW manages the lower Dolores River within the Planning Area (from the town of Gateway to the CO-UT state line) for native, non-listed aquatic species. The CDOW considers the bluehead sucker population within this stretch of river outstanding on a regional scale. The native fish community comprises approximately two-thirds of the fish community. Bluehead suckers account for approximately one-third of the native fish population. Multiple age classes of bluehead suckers are also present.	X			
Recommendation: As required by law, the Grand Junction RMP must carefully analyze all potentially eligible stream segments, adopt requirements to ensure eligible and suitable rivers are protected pending decisions on their designation, and ensure any designated rivers and river corridors are managed to preserve their values. Any Suitability determinations must only include the eight criteria required by	X			

<b>Table E-6 Representative Comments for Special Designation Areas</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
law.				
<p>Rivers deemed eligible for inclusion in the Wild and Scenic Rivers System must be managed to protect their outstandingly remarkable values until the suitability determination is made, and suitable rivers must be managed so as to protect their qualities until Congress has an opportunity to designate the river as part of the System. Given that water is relatively sparse and that riparian areas are scarce in the study area, each stream is of tremendous value, and the BLM should fully protect these priceless resources via the Wild and Scenic Rivers Act and the Grand Junction RMP. Eligibility determinations are required during the resource management planning process under Section 5(d)1 of the Wild and Scenic Rivers Act. To be eligible for inclusion in the NWSRS, a river or segment thereof must be “free-flowing” and it or its related land area must possess at least one outstandingly remarkable value (ORV). 16 U.S.C. § 1273 (b); see also Center for Biological Diversity (CBD) v. Veneman, 349 F. 3d 1108, 1109 (9th Cir. 2005) (defining eligibility).<sup>14</sup> These ORVs are the “scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values” listed in section 1 of the WSRA. 16 U.S.C. § 1271. Intermittent streams should also be considered for eligibility. As long as the flows in a stream are adequate to contribute to the outstandingly remarkable values, non-perennial streams should be considered for eligibility in resource management plans. (See Interagency Wild and Scenic River Council’s A Compendium of Questions and Answers Relating to Wild &amp; Scenic Rivers, A Living Draft at 17.) Whether found suitable or not, all segments found eligible must, under the provisions of the Wild and Scenic Rivers Act and accompanying regulations, be managed in order to preserve the characteristics that make those segments eligible. Protective management prescriptions and requirements—specific to segments’ values that prompt findings of wild and scenic eligibility and suitability—must be included the final RMP and so must be carefully analyzed in preparation of the draft plan. Consideration other management prescriptions or designations that could, by coincidence, help protect features that contribute to the segments’ eligibility and suitability are helpful (wilderness study areas, areas of critical environmental concern, visual resource management classes, mineral withdrawals, etc.). Those coincidental protections and designations must, in the final RMP and in its implementation, must specifically supplement wild and scenic river purposes, or similar measures must be provided in the final plan exclusively for wild and scenic river purposes.</p> <p>Similarly, the BLM’s contemplation of “riparian areas considered for special management” is both laudable and important. Such special management designations should supplement, and not replace, complete consideration of wild and scenic river values or complete protection under the terms of the Wild and Scenic Rivers Act and its provisions for study and for interim protection.</p> <p>Whatever the ultimate collection of stream segments found to be suitable, all those segments should be subject to all available protective measures. Such measures include (but are not limited to) managing all suitable segments:</p> <ul style="list-style-type: none"> <li>• closed to off-highway vehicle use;</li> <li>• withdrawn from mineral entry;</li> </ul>	X			

Table E-6 Representative Comments for Special Designation Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
<ul style="list-style-type: none"> <li>• as VRM Class I or Class II areas;</li> <li>• as right-of-way exclusion areas;</li> <li>• subject to remedial actions to ensure sensitive species habitat is maintained or enhanced;</li> <li>• subject to extensive and reliable no-surface-occupancy stipulations for all activities;</li> <li>• with related ACECs closed to off-highway vehicle use;</li> <li>• with related ACECs closed to oil and gas exploration and development;</li> <li>• among other appropriate measures.</li> </ul>				
<p>When conducting suitability determinations the BLM should consider only the criteria contained within the Wild and Scenic Rivers Act (16 U.S.C. § 1271-1287). Congress explicitly limits federal agency discretion in the suitability determinations by prescribing eight specific criteria for consideration. These items include: (1) a description of the area (with maps); (2) the eligibility characteristics (free-flowing and ORVs); (3) status of landownership; (4) reasonably foreseeable future uses that would be enhanced, foreclosed, or curtailed if included; (5) the Federal agency administering the area; (6) the extent to which costs are shared by the state; (7) the costs to the U.S.; and (8) the degree to which the state may participate in protection and administration of the river. See 16 U.S.C. § 1275 (a); § 1276 (c). In fact, the plain language of section 4 (a) of the WSRA, the legislative history, the Interagency Final Revised Guidelines for Eligibility, Classification and Management of River Areas, 47 Fed. Reg. 39454 (September 7, 1982), and express policy goals of the WSRA suggest that some threat of future development does not, and should not, render a river “unsuitable.” See 16 U.S.C. § 1275 (a)(i) (only those “developments which, if undertaken, would render the rivers unsuitable.”); see also H.R. Rep. No. 90-1623 at 3808 (seeking to protect rivers that “are the most threatened by developments which, if they materialize, would render the rivers unsuitable”). Only Congress retains the prerogative to determine political decisions under the Wild and Scenic Rivers Act. By basing a suitability decision on political questions and factors, the Federal agencies are: (1) considering factors beyond those that Congress authorized them to consider when conducting suitability studies; and (2) are, in effect, bypassing and shortcutting the designation process envisioned by Congress.</p>		X		
<p>In October 2008, the National OSTA Board hosted their board meeting in Grand Junction ...they were very excited that so much of the OST in our area is already under the management and control of the Federal government(BLM), and commented that for that very reason it is a premier location along the entire multi-state OST for remaining open and protected from development. In many places all that remains is a plaque that says "the Old Spanish Trail use to be here". We look forward to working with you in our efforts to preserve, educate, and protect this historical and archeological treasure.</p>	X			
<p>[commentor requests] Development and placement of better interpretive/historical signage, plus more protective signage, e.g., more and larger 'no motor vehicles' signs, etc. [for the Old Spanish Trail]</p>			X	

<b>Table E-6 Representative Comments for Special Designation Areas</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
The Old Spanish Trail/Gunnison River Bluffs areas are in need of Visual Resource Management. Current plans for development not only physically may alter the characteristics of the trail but the view shed is of particular concern. Without BLM's assistance with Visual Resource Management, development will destroy the trail users experience as well as degrade the historical significance of the trails. It is currently listed as a Class III. It should be reclassified as a Class II in order to preserve the current characteristics of the area.	X			

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

Table E-7 Representative Comments for Wilderness Study Areas and Lands with Wilderness Characteristics	Planning Classification <sup>1</sup>			
	A	B	C	D
Further wilderness designations should not take precedence over other activities that will provide jobs and hence contribute to the economy. Mining, logging, and gas production activities have certain life spans and, following reclamation, future generations will be able to enjoy recreation in those areas without them being designated as wilderness.	X			
Quality habitat and outstanding natural characteristics exist throughout the Grand Junction resource management area. The wilderness character of such places as Dominguez Canyon, Sewemup Mesa, The Palisade, Demaree Canyon, and Bangs Canyon should be protected	X			
Resolve the South Shale Ridge Wilderness Characteristic issue or any other areas that are identified as having wilderness characteristics and also development potential.	X			
We dislike additional Wilderness areas.				X
[ I suggest that] any wilderness feasible lands be set aside for wilderness.				X
There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing wilderness inventory and review. Once the "603 Process" was completed, the agency is done. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American People. Other than the management of existing WSA's, the BLM should have no part in this issue. To do so is a tragic loss of management resources.				X
It is improper to make decisions based upon an inventory for a single resource value, in this case; 'Wilderness character'. Section 201 directs the Secretary to: "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern." It is clear from this language that all resource and other values on the public lands were to be part of a single inventory. When planning, there is no authorization for the agency to engage in inventories for a small segment (Wilderness) of only part of the spectrum of "resources and other values" (recreation). It is clear from the parenthetical phrase inserted in this section by Congress that Congress wanted the broadest range of resources and values considered and listed specifically two among the many which were to be included.		X		
b. BLM should consider designating new Wilderness Study Areas. We are aware of the April 2003 settlement agreement (Utah Settlement) between Secretary of the Interior Norton and the State of Utah (in which BLM abdicated its authority to designate any additional Wilderness Study Areas (WSAs)), and we maintain that this agreement is invalid and will ultimately be overturned in pending litigation. Recommendation: In light of the most recent ruling and subsequent action of the parties, we emphasize that the BLM can and should continue to designate new WSAs in this planning process. BLM's current policy also does not justify excluding creation of new WSAs from consideration in one or more management alternatives. If BLM fails to fulfill these obligations, it risks violating both FLPMA and NEPA, and jeopardizing the validity of this entire planning process.		X		
The lands governed by the Grand Junction RMP contain pristine wildlands, including those identified in Congresswoman Diana DeGette's Colorado Wilderness Act, most recently introduced in the 110th Congress. Section 201 of FLPMA mandates that BLM inventory the		X		

<p align="center"><b>Table E-7</b>  <b>Representative Comments for Wilderness Study Areas and Lands with Wilderness Characteristics</b></p>	<p align="center"><b>Planning Classification<sup>1</sup></b></p>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
resources of the public lands, their resources and values. 43 U.S.C. § 1711. In the land use planning process, including revision of RMPs, Section 202 of FLPMA requires that BLM take into account the inventory and determine which multiple uses are best suited to which portions of the planning area. 43 U.S.C. § 1712. BLM’s mandate of multiple use and sustained yield, as well as other relevant law and BLM’s current guidance, provides for inventory and protection of wilderness values. BLM is obligated to inventory for and consider a range of alternatives to protect lands with wilderness characteristics.				
As well, Citizens’ Wilderness Proposal (CWP) areas found in the Gateway Recreation Area should be designated as Wilderness Study Areas (WSAs) and be recommended for wilderness, specifically the Granite Creek, Sagebrush Pillows, Unaweep, and Maverick Canyon CWPs and including the Palisade and Sewemup Mesa CWP additions to the current WSAs. However, as an interim protective measure we recommend they be managed as stand alone "Undeveloped SRMAs," rather than as part of either the "Destination SRMAs" or "Community SRMAs" as was done in the Little Snake RMP. Within the "recreation area" framework, this designation will provide them with the strongest possible protection short of WSA status. Recreation planning is an extremely important aspect of public lands management. Planning for recreation and determining appropriate routes for the public to travel on by various means is vital in protecting all resources on public lands. We applaud the BLM for completing recreation planning in the Gateway area before the pressure is unmanageable. Determining proper recreation management now will go a long way toward maintaining the special qualities in the area which visitors experience today.	X			
Wilderness: The "no more wilderness" policy adopted by former Secretary Gale Norton will undoubtedly be rescinded in the coming months, and BLM will be free to recommend additional areas for wilderness status. We urge BLM to recommend wilderness designation for all of the citizen-proposed units known as Bangs Canyon, Granite Creek, Hunter Canyon, Kings Canyon, Maverick Canyon, Sagebrush Pillows, and Unaweep Canyon. BLM should also expand the wilderness recommendations for the five WSAs as proposed by citizen groups, including Dominguez Canyons, Little Book Cliffs, Demaree Canyon, The Palisade, and Sewemup Mesa. On one of my visits I spent a day hiking in Dominguez Canyons and found the area to be wild and well qualified for wilderness status.				X
[Areas of particular value] Thank you for Dominguez Canyon Wilderness Area			X	
It appears that the BLM may attempt to utilize the 1999 Inventory in this RMP revision. BRC advises caution. The lack of public involvement in formulating the inventory criteria as well as lack of public involvement in the inventory itself has produced a flawed result.			X	
long-term goals desired by Gateway Canyons and John Hendricks are: Preservation of the Palisade Wilderness Study Area and the Sewemup Mesa Wilderness Study Area in their primitive, road less condition. These WSAs have such special value that they should not be disturbed for further mineral exploration activity.	X			
The RMP will oppose the "conservation area surrounding the Dominquez WSA".	X			
We support full protection of both the Palisade and Sewemup Mesa wilderness study areas (WSAs), as well as the CWPs, Granite Creek, Maverick Canyon, Sagebrush Pillows, and Unaweep. The latter need to be placed in either of the Primitive setting prescriptions, either	X			

Table E-7 Representative Comments for Wilderness Study Areas and Lands with Wilderness Characteristics	Planning Classification <sup>1</sup>			
	A	B	C	D
“pristine” or “transition,” (in the “Physical” “Social” and “Administrative” settings matrix categories) until they can be permanently protected. As an interim protection measure these should all be identified as Undeveloped SRMA, rather being part of the Gateway destination SRMA, to maintain low visibility and limited visitation. We likewise recommend an Undeveloped SRMA designation for Granite Creek, Zone 9 in Gateway.				
Dominguez Canyon WSA: We strongly object to the expansion of wilderness designation beyond the present WSA boundaries. Any change in the presently prescribed allocation of motorized and non motorized uses would not be in the best interests of the community. Motorized intrusions into the WSA in its present form are rare. Changing the boundaries would create new and un-necessary expansion of restrictive regulations. Wilderness values are presently well protected.	X			
Wilderness: All current areas in Wilderness Areas and WSAs need to remain open to motorized use.	X			
As a former Colorado resident and frequent visitor I strongly encourage you to use management plans that protect the state's wilderness and BLM lands as just that, wilderness. As the stewards of this land wisdom and foresight are needed. Colorado is blessed with some of the country's most astounding natural beauty, and we need to keep it that way with smart management practices based on long-term sustainability, not short-term benefits or the accessibility to damaging parties.	X			
There are enough existing Wilderness Areas and Wilderness Study Areas in the BLM Grand Junction Field Office managed area. We do not support any more designations of Wilderness Areas or Wilderness Study Areas; we do not support areas that are “managed for wilderness qualities.”	X			
Economic benefits – The recreation opportunities provided by wilderness quality lands also yield direct economic benefits to local communities. According to the U.S. Fish & Wildlife Service, in 2006 State residents and non-residents spent \$3 billion on wildlife recreation in Colorado. (USFWS 2006, National Survey of Hunting, Fishing and Wildlife-associated Recreation - <a href="http://www.census.gov/prod/2008pubs/fhw06-co.pdf">http://www.census.gov/prod/2008pubs/fhw06-co.pdf</a> ). In addition, local communities that protect wildlands reap measurable benefits in terms of employment and personal income. For instance, a report by the Sonoran Institute (Sonoran Institute 2004, Prosperity in the 21st Century West -The Role of Protected Public Lands) found that: Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands. These findings confirm earlier research, showing that wilderness is in fact beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Recent survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. (Morton 2000, Wilderness: The Silent Engine of the West’s Economy). Other “non-market” economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic viewsheds, biodiversity conservation, and watershed protection. (Morton 1999, The Economic Benefits of	X			

Table E-7 Representative Comments for Wilderness Study Areas and Lands with Wilderness Characteristics	Planning Classification <sup>1</sup>			
	A	B	C	D
Wilderness: Theory and Practice; Loomis 2000, Economic Values of Wilderness Recreation and Passive Use: What We Think We Know at the Turn of the 21st Century). All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands.				
I. Wilderness character is a valuable resource and important multiple use of the lands governed by the Grand Junction RMP. BLM has identified “wilderness characteristics” to include naturalness or providing opportunities for solitude or primitive recreation. See, Instruction Memoranda (IMs) 2003-274 and 2003-275. These values should also be identified and protected through this planning process. BLM should recognize the wide range of values associated with lands with wilderness character: (a) Scenic values – FLPMA specifically identifies “scenic values” as a resource of BLM lands for purposes of inventory and management (43 U.S.C. § 1711(a)), and the unspoiled landscapes of lands with wilderness characteristics generally provide spectacular viewing experiences. The scenic values of these lands will be severely compromised if destructive activities or other visual impairments are permitted.	X			
Lands with wilderness characteristics provide opportunities for primitive recreation, such as hiking, camping, hunting and wildlife viewing. Most, if not all primitive recreation experiences will be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved.	X			
As part of the Gateway SRMA plan, BLM should consider and evaluate lands with wilderness characteristics. BLM should manage the existing Wilderness Study Areas and units of the Citizen’s Wilderness Proposal to protect their wilderness characteristics in a manner that is sufficiently protective, including closing these areas to off-road vehicles or other forms of recreation that could harm wilderness characteristics.	X			
With the current increased usage of this resource area the BLM must ensure that particular areas continue to be protected for their pristine wilderness characteristics. These areas include: Dominguez Canyons, Little Book Cliffs, Demaree Canyon, The Palisade, Sewemup Mesa, Bangs Canyon, Granite Creek, Hunter Canyon, Kings Canyon, Maverick Canyon, Sagebrush Pillows, and Unaweep Canyon.	X			
The BLM should take this opportunity to fully re-inventory its lands in the Grand Junction Resource Area for wilderness characteristics and assign special management prescriptions to protect these wilderness-quality lands.	X			
Protection of South Shale Ridge and Bangs Canyon should be included, since the BLM has already acknowledged their wilderness values, but is not currently managing them so that future generations can enjoy them.	X			
Due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, thereby supporting additional resources and uses of the public lands. As part of their habitat, many species are also dependent on riparian and other wetland habitats, especially during either seasonal migrations or seasons and years when surrounding habitats are dry and unproductive. Wilderness quality lands support biodiversity, watershed protection and overall healthy ecosystems. The low route density, absence of development activities and corresponding dearth of motorized vehicles, which are integral to wilderness character, also ensure the clean air, clean water and lack of disturbance necessary for productive wildlife habitat and riparian areas (which support both wildlife habitat and human uses of water).	X			



<p style="text-align: center;"><b>Table E-7</b>  <b>Representative Comments for Wilderness Study Areas and Lands with Wilderness Characteristics</b></p>	<p style="text-align: center;"><b>Planning Classification<sup>1</sup></b></p>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
Further, inventorying lands with wilderness characteristics will also provide important data on existing large blocks of habitat and how BLM can restore these blocks of habitat to better match the historic range of variability. Identifying, restoring and protecting substantial roadless areas in the lands governed by the Grand Junction RMP can provide crucial benefits to wildlife.				
Quality of life – The wildlands located within the Grand Junction Field Office help to define the character of this area and are an important component of the quality of life for local residents and future generations, providing wilderness values in proximity to burgeoning urban and suburban areas such as the town of Grand Junction. Their protection enables the customs and culture of this community to continue.	X			
Many other multiple uses of public lands are compatible with protection of wilderness characteristics – in fact, many are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife habitat). Protection of wilderness characteristics will benefit many of the other multiple uses of BLM lands, while other more exclusionary uses (such as off-road vehicle use and timber harvesting) will still have adequate opportunities on other BLM lands	X			
BLM should also consider other management alternatives for protecting lands with wilderness characteristics. The Utah Settlement does not affect BLM’s obligation to value wilderness character or, according to BLM directives, the agency’s ability to protect that character, including in the development of management alternatives. In fact, BLM has not only claimed that it can continue to protect wilderness values, but has also committed to doing so...(see comment letter for detailed management recommendations)	X			
Travel management. Travel management planning within WSAs must minimize ORV motorized routes, which can impair wilderness characteristics. BLM is obligated to manage the WSAs in accordance with the Interim Management Policy (IMP) for Lands Under Wilderness Review (BLM Manual H-8550-1), which requires that WSAs are managed to protect their wilderness values. DRMP/EIS, p. 2-50.....(see comment letter for detailed management recommendations)	X			

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Table E-8 Representative Comments for Water, Soil, and Riparian Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
After hearing of "water restrictions" in Rifle, Co- I am concerned about the people who choose to start growing their own vegetable/fruit tree gardens. Alone I am ultra conservative with my water usage but younger people should be taught that conservation.				X
I. Soil and Water: a. Review or conduct soils surveys on the parcels proposed for disposal; b. Conduct a study of salinity and selenium occurrence and mobilization potential on BLM lands proposed for disposal; c. Identify or map BLM lands where additional seepage or deep percolation from irrigation or unlined ponds could create salinity or selenium loading problems; d. Deed restrict or avoid the exchange of parcels known to be high in selenium and salts; and e. Strongly consider whether the disposal of these properties and the effect of future potential land uses are in compliance with the State of Colorado Water Quality Standards and the Colorado River Basin Salinity Control Act.	X			
Protect watersheds and valuable wildlife habitat throughout the plan area	X			
Considered areas for riparian special management should be expanded to include the Gunnison River that feeds the areas currently suggested. A large portion of the Gunnison River Bluffs area north of the river has a conservation easement managed by the BLM currently. Special management of this portion of the river that feeds the riparian areas currently considered would enhance this goal.	X			
Riparian zones throughout the area need to be protected and in many cases enhanced. Some of the best populations of blue grosbeak and yellow-breasted chat occur along the Dolores River, with gray vireo occurring in juniper habitat just above the riparian zone. There is considerable concern that camping in such areas will inevitably lead to fire, as has happened so many times in the past, thereby destroying another critical piece of habitat. Likewise, while clearing of salt cedar is highly desirable over time, it needs to be done judiciously, with Goodling willow and other desirable vegetative species replacing the salt cedar. Coyote bush has been recommended along the river so as to protect from fire and to allow for a more timely replacement of undesirable species.	X			
EPA believes wetlands should be afforded the highest level of protection, either through closing certain lands to leasing or through the use of No Surface Occupancy (NSO) stipulations. This is especially true for wetland and riparian areas of WSAs and ACECs. We suggest that lease stipulations to protect wetlands be strongly considered, We note that the Record of Decision for Western Uinta Basin Oil and Gas Leasing issued by the Uinta and Ashley National Forests in 1997 required "No Surface Occupancy" (NSO) as the lease stipulation for riparian lands and wetland areas over 40 acres. For travel management in the planning area, EPA recommends BLM give preference to routes that do not have sensitive soils; wetlands, stream crossings, critical habitat, meadows, etc. EPA recognizes the challenges facing BLM in analyzing~ understanding and ultimately managing wetland resources in planning areas that cover vast areas of Colorado. Nonetheless, the RMP/EIS should address generally the expected impacts to wetlands. More importantly, the RMP/EIS should describe specifically how wetlands "will be identified, avoided, or ultimately mitigated at the project specific level. The discussion should address situations with private land/federal minerals and federal land and federal minerals. Additional comments regarding wetlands and riparian	X			

Table E-8 Representative Comments for Water, Soil, and Riparian Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
areas are enclosed in the attached "Detailed Comments,"				
Prioritize protection of riparian corridors in this high, dry landscape. Riparian zones occupy 2% of the land area in the west and support 98% of the plant and wildlife species! Keep recreation and other development out of riparian areas. Avoid new trails in riparian corridors, motorized, mt bike or hiking.	X			
We are intrigued by the concept of riparian management areas, as initially discussed at recent public meetings on the RMP planning process and as initially depicted on the map, "BLM Riparian Areas Considered for Special Management". We appreciate the BLM's attention to streams and their stream-related riparian corridors as essential and fragile components of the landscape and general watersheds of the study area and encourage the agency to improve management of these areas outside of segments deemed eligible for Wild and Scenic River status under existing authorities. Riparian areas are essential to the productivity of ecosystems. Although they represent only a small percentage of the area of a landscape, they provide a disproportional percentage of the productivity of ecosystems including contributions to biodiversity, fish habitat, migration corridors and connectivity between diverse sections of the landscape. Correspondingly, we look forward to working with the BLM in identifying specific stream and riparian values that warrant special protective management, in devising and refining specific protective management measures, and in promoting supporting their successful implementation. Additional riparian areas already identified by the BLM should be added to those considered for special management. Such additions should include all streams flowing through or associated with values in wilderness study areas, citizens' proposed wilderness, existing or candidate areas of critical environmental concern, and other areas potential suitable for special land protection designations. We note that, whatever such riparian management measures are considered and implemented, the BLM must diligently and thoroughly fulfill its study and protection obligations as defined in the Wild and Scenic Rivers Act and in associated regulations and agency guidance. Other study processes or management measures must be used to supplement, and not replace, those wild and scenic protective actions. <b>Recommendation:</b> The BLM should protect riparian areas on a watershed scale creating protective linkages between segments of land and rivers with special designations to maximize connectivity and maintain or improve ecosystem function.	X			
Use a common sense approach to erosion control, as for the most part is presently common practice. The emphasis here is on "common sense".	X			
Identify and protect seasonal and ephemeral wetlands, streams and pools.	X			
For areas with significant oil and gas development, water source protection may be a key issue. EPA recommends the RMP//EIS analyze the potential impacts to groundwater, drinking water, and irrigation waters.	X			

<b>Table E-8 Representative Comments for Water, Soil, and Riparian Areas</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
Water source protection is particularly important for oil and gas development on split estates (federal minerals/private surface) that are used for farming and ranching and where property owners may be reliant on groundwater and/or surface water for drinking and irrigation, The RMP/EIS should identify all relevant, reasonable monitoring and mitigation measures to protect these water sources even if they are outside the jurisdiction of BLM.	X			
Town of Collbran Watershed Protection - The Town of Collbran has adopted a watershed protection plan ordinance in conformance with the Colorado Revised Statutes. BLM should manage their public lands to prevent any adverse impacts to the town's watershed. The BLM Resource Management Plan should include maps showing the Collbran watershed and include management policies requiring protection of this important public resource.	X			
<p>9. Watershed, Soil and Water (Salinity) and Energy Development Concerns</p> <p>Grand Junction submits comments regarding water resources and construction methods that may impact water resources resulting from all forms of development, including energy development, on lands owned by the City and located within its source water supply area. These comments have been previously submitted to BLM on the proposed Aspen Operating Master Development Plan (Attachments B &amp; C) and the West-Wide Energy Corridor Programmatic Environmental Impact Statement Energy Corridor Map (Attachment D). The documents are included in the Appendix to these comments. We request all documents included in the Attachments be considered by BLM as part of the scoping process.</p> <p>The August 2007 Watershed Plan (the "Genesis Plan") for the Town of Palisade and the City of Grand Junction is also included (Attachment E) as a reference to include in the RMP. The Watershed Plan is a collaborative document between the Bureau of Land Management, Grand Junction Field Office and the United States Forest Service, Genesis Gas &amp; Oil LLC, Town of Palisade, City of Grand Junction, Mesa County, Ute Water Conservancy District, Mesa Water and Sanitation District and the Saddle Mountain Ranch. The Genesis Plan was developed to protect air, land and water resources within the Palisade and Grand Junction watersheds by properly managing potential future energy development and maintaining water-related assets. The Genesis Plan incorporated most of the important objectives of Grand Junction's Watershed Ordinance and Watershed Regulations in order to protect Grand Junction's critical water assets.</p> <p>The BLM has stated, at working group meetings to develop the Watershed Plan that the Plan would be used for any future commercial or industrial development in the watershed or on any BLM administered lands located within the RMP area in the future. BLM has also stated that the Plan would apply to future site operators, such as Aspen Drilling, whether they participated in the watershed plan development process or not.</p>	X			
The hydrology map clearly illustrates the water resources in the Grand Valley. It is common enough that the Palisade and Grand Junction watersheds (as well as other critical water resource areas) coincide with critical habitat, scenic views and even the Grand Mesa Slopes SRMA. Protection of these resources is absolutely critical for numerous reasons. Please be sure that the new RMP reflects this fact!	X			

Table E-8 Representative Comments for Water, Soil, and Riparian Areas	Planning Classification <sup>1</sup>			
	A	B	C	D
Noxious weed management affects the health and function of the riparian communities and is a significant issue with regard to species diversity and health of wildlife habitat. It appears that noxious weed management is not meeting its needed objective on the landscape especially within major Oil and Gas development areas. Noxious weed management needs to be adequately addressed and analyzed within the RMP revision.	X			
Manage entire watersheds with the presence of special status aquatic species and their habitats for specific protections (I.e., ACECs, WMAs, WSRs) with specific stipulations and mitigation measures (NGD/NSO, SSR/CSU, TL, and BMPs)	X			
Apply NGD/NSO stipulations within riparian zones and 300 foot corridors (measured from the outer most edge of the riparian zone wetland habitats, and eligible WSR waterways)	X			
Manage and restore riparian and wetland habitats critical to the long-term sustainability of native fish and native amphibian species <ul style="list-style-type: none"> <li>• Protect the soil, hydrologic, and watershed conditions that support riparian and wetland habitats</li> <li>• Enhance the health, productivity, and ecological condition of native and other desirable plant communities within riparian and wetland habitats</li> <li>• Manage riparian/wetland habitats to achieve diverse native species composition</li> <li>• Promote healthy native plant communities to deter noxious weeds while minimizing and eradicating noxious weed and undesirable exotic species</li> <li>• Control weeds along riparian/wetland corridors using integrated control techniques. Utilize focused control techniques in riparian and wetland habitats to avoid negative impacts to non-target species</li> </ul>				
Provide watershed protection for fishes and native amphibians with the following actions: Comply with and implement local, state, and federal laws, statutes, regulations, standards, and requirements for protection of aquatic resources <ul style="list-style-type: none"> <li>• Maintain or improve water quality and quantity for ground and surface waters at a watershed level</li> <li>• Maintain or improve water quality for waters (ground and surface) originating in municipal watersheds and serving as current and future sources of potable water</li> <li>• Ensure sufficient water supply available for use by municipalities and natural hydrological systems now and in the future</li> <li>• Manage for activities that positively recharge the water quality of aquifers</li> <li>• Protect valid and active water rights</li> <li>• Establish baseline water quality monitoring and evaluation program for drainages (ground and surface waters) prior to, during, and after allowing surface disturbing activities</li> <li>• Evaluate disturbance related water quality changes by identifying and implementing mitigation measures to meet water quality</li> </ul>	X			

<p style="text-align: center;"><b>Table E-8</b> <b>Representative Comments for Water, Soil, and Riparian Areas</b></p>	<p style="text-align: center;"><b>Planning Classification<sup>1</sup></b></p>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>standards</p> <ul style="list-style-type: none"> <li>• Maintain or improve natural stream flow and stream ecological function by preventing or minimizing direct, indirect, or cumulative adverse impacts to aquatic species and their habitats</li> <li>• Protect aquatic ecosystem integrity and hydrologic function which support aquatic species and their habitats</li> <li>• Utilize fire retardant and flame suppression chemicals that do not degrade water quality, and adversely impact aquatic species and their environments</li> <li>• Reclaim lands impacted by wildland/prescribed fire quickly and effectively</li> </ul>				
<p>I would like you to consider repairing the flood retention pond on BLM land on the north end of 33rd at the foot of the Book Cliffs. The property owners would like to have more retention ponds in this area to help control storm water on the BLM land as it floods the private land below. In my opinion we need more of these ponds north of I-70 on BLM land between 29 rd and 34 rd.</p>			X	
<p>A significant portion of the tributaries and rivers in Western Colorado are included on Colorado's list of impaired waters due to selenium pollution. It is important to avoid further increases in water pollution in the form of salt and selenium pollution due to anticipated growth in Western Colorado. Requiring wise water practices (e.g., limiting outdoor irrigation and use of native or xeric plants) on land parcels proposed to be disposed of by BLM can help to protect and improve water quality in western Colorado Rivers and streams.</p>	X			

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

Table E-9 Representative Comments for Special Status Species Management	Planning Classification <sup>1</sup>			
	A	B	C	D
Special Status Species- Regardless of the current administration's rule changes, the GJFO should manage deserving CDOW species of concern as Special Status Species. Kit fox, burrowing owl and white-tailed prairie dog are example of species which this field office has much of the responsibility for preserving. Of course preserving prairie dog towns is required to preserve golden eagles, and ferruginous hawks, which are a BLM state Sensitive Species. Obviously, both sage-grouse species should be given the highest possible consideration. Low riparian species, especially yellow-billed cuckoos are especially important. All of the cuckoo literature agrees with our experience in Delta County in that they require tall cottonwoods and a healthy understory. Cottonwoods with only grass or dirt are of little value to most native species.		X		
We anticipate that the recent changes to the BLM Manual weakening protections for special status species will be overturned by the Obama administration. Therefore we encourage the Grand Junction Field Office to ensure that it meets the obligations outlined in the special status species portion of the Manual as it appeared before it was weakened and note that these measures are still consistent with the direction of the manual as revised. BLM Manual 6840.06.D set forth the policy for management of Sensitive species. During RMP revision, the BLM must take a hard look at whether it is meeting these obligations, and make any necessary changes to ensure that special status species are being adequately managed so that the agency is complying with the Manual.	X			
Apply NGD/NSO, and/or SSR/CSU restrictions, and/or TI, and BMPs within critical habitat, breeding sites, spawning areas, and within the immediately adjacent aquatic ecosystems that support special status aquatic species	X			
Monitor and evaluate increased recreational use of areas occupied by special status aquatic species	X			
Ensure known midget faded rattlesnake dens are not destroyed.	X			
Not only should federally-listed plants and animals be considered for protection, but also state-listed species. While protection of federally-listed species may be mandated, there would be nothing wrong with being proactive and working beyond minimal conservation requirements toward fuller conservation efforts.	X			
I. Special Status Species Management a. Flora The GJFO's scoping documentation related to special status species management in the RMP management area (Map 6.4 - Rare and Threatened Plants) identifies some overlap between climbing and rare plant regions. However, GJFO scoping documents reveal no overlap between climbing and 1987 RMP's inventory of Threatened and Endangered Species. When planning for the management of climbing and special status species the GJFO should consider that instead of any potential access restrictions into areas with rare plants, alternate climber trail routing and the strategic use of fixed anchors have proven to be effective resource protection tools that do not require unnecessary access restrictions. If many climbers use an area, some degree of formalization and stabilization of climber trails will eventually become desirable. Some climber trails may be redundant or adversely affect resource or	X			

<b>Table E-9 Representative Comments for Special Status Species Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>aesthetic values. Such trails can be minimized or in some cases eliminated. Local climbing representatives can provide input on the minimum trail requirements to access climbing locations. Management response may initially include conducting a climber trail inventory. Local climbing guidebooks will often describe climber access routes, descent routes, and locations of other climbing-related trails. Consultation with a local climbing representative or arranging a joint site visit may also help with climber-trail inventory. Once trails are documented, a map is created. If necessary, a trails plan can be developed to eliminate redundant or unnecessary trails. Some trails may be targeted for stabilization or upgrading to withstand heavier traffic, while others may be closed to protect sensitive resources, and replaced with new, re-routed trails. Local climbing representatives may prove helpful in dispersing information concerning desired changes in climber-trail use. Other management options include signing of management-preferred trails, and brochure, kiosk, and poster information concerning site advisories or area closures. There have been many examples of successful climber trail management. At Idaho's City of Rocks National Reserve, for example, climbers and hikers originally used (and then expanded) livestock trails through sagebrush vegetation. A park-wide trails plan was developed to identify a rational trails network and mitigate impacts. At California's Joshua Tree National Park, climber-trail networks have been formalized using a special climber-specific symbol. This is produced in the form of a weather resistant sticker that can be applied to standard trail marking carsonite posts. The symbol (an image of a carabiner—a piece of climbing equipment) is recognizable to climbers, but not the general public. Fixed anchors can also serve as a resource protection tool. Their strategic placement lets climbers descend to the ground without needing to exit over the cliff edge, allowing cliff-top vegetation to remain undisturbed. Rappel anchors are available in earth-tone colors for low visual impact. This practice is widespread on dozens of federally-managed public lands across the country</p>				
<p>I. Special Status Species Management b. Fauna</p> <p>The GJFO's scoping documentation related to special status species management in the RMP management area (Map 8.1 - Avian Species of Concern) also identifies some overlap between climbing and protected avian species. Evidently there are Bald Eagles and Peregrine Falcons in Unaweep Canyon and The Palisade area. The GJFO's scoping documents do not state any proposed management actions for avian species habitat nor whether these areas are currently active nesting sites, and if the GJFO has consistent and current data on nesting and fledgling viability. The Draft RMP with alternatives should also provide specifics regarding current nesting sites.</p> <p>The Access Fund has long been an active stakeholder in the various federal and state policy development related to climbing and cliff-nesting raptors. For example, see our publication <i>Raptors and Climbers: Guidance for Managing Technical Climbing to Protect Raptor Nest Sites</i>. Climbing activity can affect wildlife in ways including attraction, habituation, and avoidance. Human presence can affect the reproductive success of wildlife by causing disturbance during breeding, feeding, or resting, or by disruption of habitat. Local climbing representatives can provide information on climbing activity and use patterns to assist resource specialists in understanding where and how climbing may affect wildlife values. Evaluation of climbing effects on wildlife should also consider effects by non-climbing visitors.</p>	X			



<b>Table E-9 Representative Comments for Special Status Species Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>Education strategies may focus on promoting awareness and recognition of sensitive species, utilization of wildlife-proof food-storage techniques, and general minimum-impact practices to protect habitat.</p> <p>Management techniques may include diversion of approach or descent trails to minimize habitat fragmentation or wildlife disturbance, and use limits and seasonal restrictions for species with special-protection status. The majority of existing wildlife-related climbing restrictions have been implemented to protect cliff-nesting raptors. Seasonal climbing restrictions protect nest sites during the breeding season by partial or complete closure of cliffs where raptors nest. Restrictions usually extend from February through to mid-August, but vary with elevation and latitude. Ideally, sites are regularly monitored and restrictions may be lifted or altered if birds fail to nest, change nest sites, or if birds fledge before the end of the restriction date. If seasonal restrictions are deemed necessary, their spatial extent will depend on many factors. Considerations will include the species-specific factors such as distribution, history of breeding success, ecological requirements, and how climbing or other recreation activities affect behavior or nesting requirements. Restriction boundaries typically take into account cliff features such as protruding buttresses that may serve as visual and sound barriers, vertical height of nests, pattern of climbing use such as proximity of established climbing routes, and tolerance of individual pairs of birds.</p>				
<p>Your management objectives should center on preserving habitat so no more species are listed as threatened and endangered. I know you have only a small portion of habitat for some species, but it is critical all potential habitats be kept in a healthy condition.</p>	X			
<p><b>Threatened and Endangered Species Management</b></p> <p>On occurrences of federally listed or candidate species and BLM species of concern, we recommend protective habitat management with no surface disturbance. Such management actions would both address the need to recover listed species and make strides to keep BLM sensitive species off of federal lists. As mentioned in the existing RMP, “overall habitat area for threatened and endangered species would continue to decrease as a result of accommodating increasing numbers of public land users and increasing human pressure on adjacent lands.” In order to address this issue, we recommend that the GJFO manage sensitive and listed species with habitat protection as the primary goal. This is particularly important for many of the rare plant species found in the GJFO, many of which are primarily dependent on GJFO BLM property for survival (e.g., <i>Phacelia submutica</i> (federal candidate), <i>Lygodesmia doloresensis</i> (BLM Sensitive Species), <i>Eriogonum contortum</i> (BLM Sensitive Species)).</p>	X			
<p>BLM should manage threatened, endangered, and special status species so as to: 1) maintain healthy ecosystems and native biodiversity, 2) maintain and restore thriving populations of rare and imperiled species, and 3) meet BLM’s obligations regarding special status species. We ask that BLM make the conservation and recovery of rare and imperiled species, and the habitat and movement corridors necessary to sustain healthy populations of such species, an explicit management objective of the new Resource Management Plan. Such an objective must be strong enough to preclude authorization of activities—including all phases of oil and gas development (including leasing, exploration, infrastructure construction, drilling, and reclamation), as well as motorized vehicle use—so as to conserve and recover special status species and moves them toward recovery. The BLM must also ensure that it does not authorize oil and gas leasing activities</p>	X			

<b>Table E-9 Representative Comments for Special Status Species Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>that will compromise air quality, water quality, opportunities for solitude, plant and wildlife habitat, cultural resources, soil crusts, or any of the other resources that the agency must conserve under its multiple use mandate. The RMP must provide a blueprint for how the BLM will ensure that oil and gas development and travel management will be made compatible with the other aspects of its mission. In some cases, this may mean disallowing development activity or motorized vehicle use altogether. The BLM should not prioritize oil and gas drilling or recreation at the expense of meeting its duties toward such species.</p> <p>This goal be clearly reflected in the objectives and standards set forth by the new plan. We ask that BLM identify crucial habitat, including movement corridors, necessary to sustain healthy populations of all of the rare and imperiled species present in the Grand Junction Field Office. Crucial habitat for rare and imperiled species, and particularly biologically rich areas, should be protected through ACEC designations. ACECs should be managed such that protection of rare and imperiled species and the ecosystems of which they are a part is emphasized above all other uses. Activities that have the potential to negatively impact rare and imperiled species, or degrade ecosystem health, should not be allowed in ACECs. In addition to protecting key habitat with ACEC designations, we ask that the new Resource Management Plan work to avoid habitat for rare and imperiled species whenever possible in areas that will be open to activities, such as oil and gas development, off road vehicle use, and livestock grazing, that have the potential to negatively impact rare and imperiled species. The new plan should also strive to apply minimization and mitigation measures that will clearly ensure that activities authorized on BLM lands through the plan, will not contribute to declines of rare and imperiled species.</p>				
<p>Greater sage-grouse and Gunnison sage-grouse: We are awaiting findings on petitions for Endangered Species Act protection for the greater sage-grouse, which is being negatively affected by oil and gas drilling. In addition, some of our organizations are challenging the Service's decision not to protect the Gunnison sage-grouse under the Act. The Inspector General for the Interior Department recently found that illegal political interference jeopardized the integrity of that decision, so conservation groups are likely to prevail in the lawsuit. The Endangered Species Coalition recently named the Gunnison sage-grouse one of the top ten most endangered species still lacking protection under the Act. The BLM must demonstrate that adequate regulatory mechanisms are in place to avoid extinction of these two species. In addition, the BLM must use all available measures to conserve all remaining populations and eventually work to recover the species throughout its former range.</p> <p>Commentor provided specific recommendations for protection of sage-grouse.</p>	X			
<p>Lynx: Multiple Lynx Analysis Units are found within the Field Office. The BLM has allowed its Conservation Agreement for lynx to lapse, and therefore may not be in compliance with the Biological Opinion that covered the agency while Land Use Plans were being revised for lynx. The BLM must consult with the Service with regard to lynx as soon as possible.</p>	X			

Table E-9 Representative Comments for Special Status Species Management	Planning Classification <sup>1</sup>			
	A	B	C	D
Colorado hookless cactus: The Service has recognized the official taxonomic change that now defines <i>Sclerocactus glaucus</i> as only occurring in Colorado. The BLM must analyze impacts to this species using its currently defined range. The taxonomic change has increased the rarity of this species. We continue to urge the BLM not to open important habitat for this species in the South Shale Ridge area to oil and gas drilling.	X			
Colorado River fish protected under the Endangered Species Act: The bonytail, humpback chub, Colorado pikeminnow, and razorback sucker are barely hanging on. All four of these species have designated critical habitat within the Field Office. The BLM must consult with the U.S. Fish and Wildlife Service over not only the depletions that result from actions authorized by the RMP, but also over habitat degradation and potential adverse modification of critical habitat. Selenium is a major concern for these species, and surface disturbance caused by oil and gas drilling or ORV use may further endanger these species which are already on the brink of extinction. In addition, the effects to these species from the vast amounts of water that will be necessary to facilitate numerous energy development projects in the upper Colorado River Basin must be considered in the Draft RMP's effects analysis under NEPA.	X			
The BLM must consider the impacts of actions authorized by the RMP on each BLM Sensitive species, and must meet its land use planning obligations toward each of these. Recommendations: BLM should protect special status species through ACEC designations. BLM must also identify a comprehensive management plan for special status species and plants that establishes monitoring and mitigation strategies. BLM should incorporate these recommended management prescriptions into the RMP in order to best protect special status species and their habitats.	X			
There are many wildlife species living on BLM lands categorized as State Endangered, State Threatened and/ or Species of Special Concern, including the State Endangered (SE) kit fox, and the State Threatened (ST) burrowing owl. Species of Special Concern (SSe) occurring in the Grand Junction Resource Area include longnose leopard lizard, midget faded rattlesnake, Townsend's big eared bat, a variety of raptors, etc. Effective protections and management actions for these species should be included in the RMP.	X			
Consultation with the CDOW in all projects occurring in Gunnison sage-grouse habitat is strongly encouraged. The CDOW strongly encourages BLM to adopt the management philosophies and conservation strategies from the Gunnison Sage-grouse Rangewide Conservation Plan and the Pinyon Mesa local conservation plan into the RMP.	X			
The status of white-tailed prairie dogs is also a growing concern to the CDOW and the environmental community. The U.S. Fish and Wildlife Service is currently evaluating the need to list this species as threatened or endangered. The CDOW is in the process of completing a Conservation Plan for Gunnison's and white-tailed prairie dogs. The plan is currently undergoing public and agency review and will be completed in the spring or early summer of 2009. The CDOW strongly encourages BLM to adopt the management philosophies and conservation strategies included in this conservation plan into the RMP.	X			

Table E-9 Representative Comments for Special Status Species Management	Planning Classification <sup>1</sup>			
	A	B	C	D
With regard to development in areas with SE, ST, SSC and raptor nest concerns, the CDOW recommends that the RMP require the development proponent to do field surveys for each of the rare species, using survey methods and effort levels that are appropriate for each of the target species. The proponent should be expected to work with the BLM and CDOW to develop and implement appropriate mitigation strategies to offset potential negative impacts.	X			
Protect, conserve, maintain, enhance, and promote long-term viability and recovery of special status aquatic species and their habitats <ul style="list-style-type: none"> <li>Consider the requirements of individual special status aquatic species versus ecosystem approaches -Prevent listing of sensitive aquatic species</li> <li>Comply with the provisions of the ESA, consulting with the USFWS and the U.S. Army Corps of Engineers when permitting any permanent or temporary activity within known or potentially occupied critical habitat for special status aquatic species; utilize and implement recovery plans for Colorado pikeminnow, razorback sucker, humpback chub, bonytail, Greenback cutthroat trout, and boreal toad</li> <li>Consult with the CDOW regarding actions that may impact state-listed species, and Species of Special Concern; utilize and implement conservation agreements and strategies for Colorado River cutthroat trout; and flannelmouth sucker, bluehead sucker, and roundtail chub</li> <li>Allow no loss or degradation of special status aquatic species' habitat -Designate ACECs and/or WSRs for waterways within critical habitat</li> <li>Apply NGD/NSO, and/or SSR/CSU restrictions, and/or TI, and BMPs within critical habitat, breeding sites, spawning areas, and within the immediately adjacent aquatic ecosystems that support special status aquatic species</li> <li>Protect and maintain the immediately adjacent hydrologic and ecological processes that support special status aquatic species</li> </ul>	X			
Parachute penstemon, DeBeque phacelia: We are awaiting findings on petitions for Endangered Species Act protection for these three species, all of which are being affected by oil and gas drilling. The BLM must show that it possesses and will effectively use adequate regulatory mechanisms to avoid their extinction. This RMP will have a major effect on the status of at least the penstemon and phacelia, and we urge the BLM to make the remaining unleased habitat for these species off-limits to drilling.	X			
Mountain plover, boreal toad: Both of these species were removed from the Endangered Species Act Candidate list by the Bush administration under suspect circumstances. A legal challenge has already been brought for the plover and some of our organizations have filed a Notice of Intent to Sue regarding the toad. While the Grand Junction Field Office may not include core habitat for these species, there are occurrence records for both within the area, and these species are at such risk that all suitable habitat must be conserved. We encourage the BLM to seek the expertise of the Service with regard to these species as well.				
Horseshoe Bend milkvetch: This is a third Endangered Species Act Candidate species that was inappropriately removed from the list by the Bush administration. The Service premised its removal on the existence of the Colorado population. The BLM must actively conserve	X			

Table E-9 Representative Comments for Special Status Species Management	Planning Classification <sup>1</sup>			
	A	B	C	D
this species, and the Colorado population will be critical to its survival since the namesake population in Utah is at grave risk from oil and gas drilling. This is another species for which the BLM should seek the Service's expertise while revising the RMP.				
DeBeque milkvetch: Center for Native Ecosystems intends to challenge the Service's negative finding on the petition some of our organizations filed for Endangered Species Act protection for the milkvetch. The Grand Junction Field Office's management of this species will be critical to its future status. Again we urge the BLM to conserve the remaining unleased habitat for this species by making it off-limits to drilling by unwaivable NSO/NGD stipulations or making it unavailable for leasing.	X			
White-tailed prairie dog, kit fox, ferruginous hawk, burrowing owl: Center for Native Ecosystems was pleased to partner with the BLM in the project to provide escape dens and artificial burrows for kit fox, and we encourage the BLM to continue its attempts to hang on to this small remaining population. The BLM should make sure that its investment in kit fox recovery is safeguarded by protecting the project area from surface disturbance and ORV use, and should strongly consider ACEC designation. Kit fox would also be served by bolstering white-tailed prairie dog populations so that artificial dens are less necessary. Some of our organizations submitted management recommendations for white-tailed prairie dogs in 2003, and we are happy to provide these again upon request - these should be incorporated in the RMP revision. Strong white-tailed prairie dog populations would also help promote strong burrowing owl and ferruginous hawk populations. We understand that nominations for ACECs for burrowing owls are being submitted to the BLM, and we strongly encourage their designation. Ferruginous hawks in the Uinta Basin seem to have been profoundly affected by oil and gas drilling and their numbers have drastically declined as artificial nest sites have been erected to compensate for the sacrifice of natural nests. For all of these species, the intact prairie dog ecosystem must be actively conserved to ensure their long-term persistence.	X			
Colorado River cutthroat trout: Recent genetic work has called into question assumptions about the range of this species. We encourage the BLM to work with the greenback cutthroat trout recovery team to remain informed about the status of the Colorado River cutthroat trout as well. As the greenback team has noted, all of these populations of native trout are important regardless of their subspecies assignment, but at this time the genetic research is pointing toward far fewer Colorado River cutthroat trout populations in existence than had previously been delineated. With mounting threats and fewer existing conservation populations, the BLM must do all it can to conserve all cutthroat trout in Colorado.	X			
Roundtail chub: Unfortunately all of the occurrences of roundtail chub in the Field Office are listed as historical. This species probably warrants Endangered Species Act protection throughout its range, and has already been petitioned in the lower Colorado River. The BLM should take action in this RMP to restore the chub to its former habitat.	X			
Roan Cliffs blazingstar and Piceance bladderpod: These two species have a relatively large number of occurrences but a very narrow distribution threatened by oil and gas drilling. If the BLM were able to actively conserve their habitat (which will be challenging given the amount of leasing that has already occurred) they might remain secure. Otherwise, Endangered Species Act protection may be necessary for these wildflowers as well.	X			

<p align="center"><b>Table E-9</b>  <b>Representative Comments for Special Status Species Management</b></p>	<p align="center"><b>Planning Classification<sup>1</sup></b></p>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>Bald eagle: The eagle remains protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act, so the BLM must ensure that it meets these obligations. It appears that there are some active nest sites in the Field Office. The BLM should follow the Service's raptor guidelines to ensure these are not disturbed. These are available from the Utah Ecological Services Office - we believe adoption by the Washington Office is pending at this time.</p>	X			
<p>High-quality occurrences of globally critically imperiled species and communities: The Field Office contains some of the very best occurrences of some of the rarest species and communities in existence. RMP revision must provide special management for these areas. These extremely rare elements include: A-ranked occurrence of GIS1 Acer negundo-Populus angustifolia/Celtis reticulata Forest, A-ranked occurrence of GIS1 Canyonlands lomatium, B-ranked occurrence of G1G2S1S2 Gypsum Valley cateye B-ranked occurrence of G1G2S1 Forestiera pubescens shrubland, B-ranked occurrence of GIS1 Juniperus osteosperma/Hesperostipa comata Wooded Herbaceous Vegetation, B-ranked occurrence of G1G2S1 Dolores River skeletonplant extant-ranked occurrence of G5T1T2S1S2 short-tailed black swallowtail, A-ranked occurrence of G3T1S1 Great Basin silverspot butterfly. The BLM must consider the impacts of actions authorized by the RMP on each BLM Sensitive species, and must meet its land use planning obligations toward each of these.</p>	X			

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

Table E-10 Representative Comments for Vegetation Management	Planning Classification <sup>1</sup>			
	A	B	C	D
Continue and expand public education efforts concerning the importance of weed detection, prevention, and management			X	
Controlled fires should be used on a regular basis. Commercial logging should be allowed. These management practices will allow for better wildfire prevention and control, and they will help to rid the forests of the beetle infestations. There should be no unreasonable regulation or time-consuming policies to hinder these efforts.	X			
Cottonwood groves along Hwy 141 from Whitewater thru Gateway and on toward Uravan have long been important refuges for a variety of bird species. The cottonwood stand along 4.1 Road west of Gateway and downstream of the Hwy 141 1;2-% mile is extremely important. Local birders prize it as the best BLM stand on the Dolores, suggesting the BLM negotiate with the adjacent landowner, John Hendricks, to minimize development of the stand. Lucy's warbler and summer tanager are reported in the stand, with potential for yellow-billed cuckoo.	X			
Likewise, lands identified in the most recent CNHP survey of rare plants, whether on a site-specific or on an area basis, need to be considered for protection from off-road use and associated impacts.	X			
Burn baby burn. The amount of decadent forest in the GJ management area is staggering . Please prioritize the areas that need wild fire management and use nature to clean those areas out when ever possible and control burns when nature doesn't lend a hand.	X			
Vegetation-This should attempt to recreate pre settlement distribution of age classes of major plants in all native habitats . This usually means managing for more late seral stage, which is what nearly all obligate wildlife species require.	X			
Weeds- No expense should be spared in implementing best science in fighting noxious invasive weeds, especially species such as cheat grass which drastically alter natural wildlife habitat.	X			
Community Landmark Protection - The map included with these comments identifies a site known locally as "Old Man Mountain". This local icon should be protected. Previous timber removal in this area has damaged the icon and management options should consider revegetation efforts to restore the appearance of this site.	X			
There needs to be a concentrated effort to rid, or at least significantly reduce, these lands of cheat grass. The health of these lands is deplorable. There are thousands of acres where the plant community is dominated by cheat grass (over 80%). As you know this type of community is extremely vulnerable to fire, offers wildlife little nutrition (except maybe in the early spring), and reduces native plant populations.	X			
Protect, do not chain or destroy "old growth" sage brush habitat. Old bushes provide habitat value that new sagebrush does not. Protect Colorado Natural Area for rare plants north of Mack.	X			
<b>c. Rare Plant Habitat</b> The BLM is a partner of the Center for Native Ecosystems in the Colorado Rare Plant Initiative, which is in the process of finalizing a set of best management practices for oil and gas drilling in rare plant habitat. Until those are available, we encourage the BLM to adopt the	X			

<b>Table E-10</b> <b>Representative Comments for Vegetation Management</b>	<b>Planning Classification<sup>1</sup></b>			
	A	B	C	D
<p>following prescriptions in ACECs designated because of their rare plant values, and to consider applying these in other rare plant habitats as well:</p> <p>Fluid-Mineral Development (including but not limited to oil and gas development):            Make all areas that have not yet been leased throughout the entire ACEC unavailable for fluid mineral leasing, or apply No Surface Occupancy (NSO) stipulations to all such areas, with no opportunity for modification, waiver, or exception under any circumstances. Make all existing fluid-mineral leases within the ACEC unavailable for future leasing following expiration; or, when existing fluid-mineral leases expire, apply NSO stipulations (with no opportunity for modification, waiver, or exception under any circumstances) prior to reissue of such leases. Apply right-of-way exclusion throughout the entire ACEC. Consider buying back existing fluid-mineral leases within the ACEC.</p> <p><b>Site Inventories:</b>            When surface disturbing projects are proposed within the ACEC, site-specific inventories should be conducted prior to NEPA analysis, and prior to initiation of any project activities. These site-specific surveys should be required in any known or potential habitats, and must take place when the plants can be detected, for example, during the flowering period. Surveys should document both individual plant locations and suitable habitat distributions. All surveys should be conducted by qualified individuals. Survey data should also be reported to the Colorado Natural Heritage Program.</p> <p><b>Monitoring:</b>            Surface disturbing activities should be monitored throughout the duration of the project, and measures designed to minimize impacts should be evaluated to ensure that desired results are being achieved.</p> <p><b>Project design:</b>            Establish a buffer of a minimum of 300 feet between individuals or groups of rare plants/lichens and any ground disturbing activities. Translocation of rare plants/lichens shall not be used as a substitute for avoidance. Construction should occur down slope of rare plants/lichens, and all project activities should be designed to avoid concentrating water flows or sediments into rare plant/lichen occupied habitat. Visibly identify areas that are to be avoided during and post-construction with temporary fencing and flagging For surface pipelines use a 300 foot buffer from any rare plant/lichens locations. If on a slope, use stabilizing construction techniques to ensure the pipelines don't move toward the population.</p> <ul style="list-style-type: none"> <li>• Ensure that water extraction or disposal practices do not result in change of surface or subsurface hydrologic regime.</li> <li>• Limit disturbances to and within suitable habitat by staying on designated routes</li> <li>• Limit new access routes created by the project, minimize the length and environmental impact of new roads constructed to service well locations, and utilize existing roads to the maximum degree possible.</li> <li>• Place signing to limit motorized travel in sensitive areas.</li> </ul>				



<b>Table E-10 Representative Comments for Vegetation Management</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<ul style="list-style-type: none"> <li>• Require implementation of dust abatement practices near occupied rare plant/lichen habitat.</li> <li>• For interim reclamation, either require that all disturbed areas be revegetated with native species comprised of species indigenous to the area (ideally from local genetic stock), or if there are major problems with preventing establishment of noxious weeds, require that disturbed areas be revegetated with either sterile F1 hybrids or with locally appropriate early successional native species capable of outcompeting weeds while also seeding for indigenous natives at the same time.</li> <li>• For final reclamation, require that the area be revegetated with native species indigenous to the area and that vegetative structure, species composition, and percent cover have returned to baseline conditions (or improved, for sites in poor condition to begin with).</li> <li>• Require post construction monitoring for invasive species, and specific measures for the control of noxious weeds. Enforce these measures through use of fines and suspension of activities when failure to control noxious weeds is documented.</li> <li>• Require use of directional drilling or multiple wells from the same pad to reduce surface disturbance and eliminate drilling in rare plant/lichen habitat. Ensure that such directional drilling does not intercept or degrade alluvial aquifers.</li> <li>• Restrict the total area of each pad to the least amount of acreage required to drill the wells planned for that pad.</li> <li>• Close and reclaim roads as soon as they are no longer needed, and gate them to prevent unauthorized use.</li> <li>• Use busing or van transportation of crews and remote monitoring of wells to minimize truck traffic and associated dust.</li> <li>• Identify rare plant pollinators, and develop mitigation and minimization measures that provide adequate protection to pollinator species.</li> <li>• Conduct routine site visits for permit compliance, set timelines for fixing permit violations, and issue fines for not meeting requirements.</li> <li>• In addition to requiring the above as conditions of approval for APDs, ask operators to undertake any additional voluntary measures that would further minimize or mitigate the negative impacts of their activities on rare plant populations and the ecological integrity of the ACEC.</li> </ul>				
<p>We strongly encourage BLM to maintain and enhance large and intact blocks of vegetation and wildlife habitat in general, and to maintain a diversity of such patches and movement corridors across the planning area. Focus on the vegetation types for which the GJFO is particularly important relative to a broader area such as the state or one or more ecoregions. Large and intact patches are particularly important to maintaining landscape function; functional wildlife habitat and species such as sage-grouse; and riparian areas.</p>	X			

Table E-10 Representative Comments for Vegetation Management	Planning Classification <sup>1</sup>			
	A	B	C	D
Set quantitative objectives for large and intact blocks. Ideally these objectives would consider the relative importance of different vegetation types within the GJFO as compared to a broader region. A plan objective could state, for example, “At all times maintain at least X functional blocks of habitat for [species] of at least Y acres each.” Functional would need to be clearly defined. Such outcome-based objectives would enable BLM flexibility with implementing the RMP. BLM could potentially shift land uses across the landscape over time while still achieving the desired conditions for large and intact blocks of habitat. Explicitly limit new disturbance within largest and least disturbed patches (i.e., most ecologically functional), particularly those which contain significant concentrations of priority species and/or vegetation. Allow no new disturbance for the most significant of these patches until other patches have been restored.	X			
Implement an integrated weed management program (including a weed management plan; predisturbance weed mapping; and mechanical, biological, and chemical control techniques) - Require weed free seed for reclamation activities -Require the use of weed free hay and feed for livestock - Require weed control actions for all disturbances	X			

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Table E-11 Representative Comments for Air Quality	Planning Classification <sup>1</sup>			
	A	B	C	D
Abide by standards set by the EPA, or by a similar state-controlled agency. No other law should be required.	X			
Ensure that you have the appropriate technology and software to properly analyze air quality...	X			
We encourage the BLM to ensure that cost-effective pollution controls are utilized as oil and gas development and other activities are authorized. With regards to oil and gas development, a number of cost-effective pollution controls are available, many of which actually yield a payback for oil and gas operators due to the recovery of natural gas. Low or no-bleed pneumatic controllers, green completions, frequent inspection and maintenance of gathering systems and pipelines, as well as closed loop production operations that utilize vapor recovery units should all be encouraged, if not required, by the BLM to ensure lasting protection of air quality in the region	X			
Grand Junction recommends the installation of upwind air quality monitors to gather baseline air quality data in order to gauge contributions from current and future sources caused by off-road recreational use on federal lands as well as future oil and gas well development in Utah and in the Grand Valley....	X			
Given that the State of Colorado has adopted emission controls for certain sources of air pollution associated with oil and gas activities, we request the BLM ensure that operators comply with these controls.	X			
The BLM must use best management practices (BMPs) to limit duct (PM-10) and nitrogen oxide (“NOx”) and volatile organic compound (“VOC”) emissions...	X			
We also request the BLM emphasize strong emission controls in close proximity to homes, schools, and communities.	X			
The BLM should utilize up-to-date monitoring data to analyzing and assess air quality impacts at the site specific and regional level.	X			
...implement mitigation measures as required to meet or positively exceed all local, state, and federal air quality regulations and standards on a site specific and cumulative basis (potential mitigation measures include methods to reduce: fugitive dust from road construction and vehicular travel for the abatement of particulate emissions, emissions of pollutants from diesel engines, and gaseous emissions from wells and compressors)	X			
Collbran enjoys clean air and water and wants to retain these environmental qualities. Protection of these resources should be paramount in BLM’s management of the public lands in the Collbran region.	X			

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Table E-12 Representative Comments for Livestock Grazing	Planning Classification <sup>1</sup>			
	A	B	C	D
Abandon and rehabilitate rangeland projects that do not function to maintain aquatic resource values and meet management objectives		X		
Initiate proactive grazing management (i.e., season of use adjustments, reduced stocking with gradual restocking levels, or complete rest) to mitigate drought effects		X		
Years ago when we owned the Lazy 3x Ranch we were asked by the BLM and the NRCS to go into the CRMP process. We had many meetings and all agencies worked well with wildlife, water, range management etc. Now the new BLM range management officer will not have our 2 meetings required each year. I guess he is just too busy. The new ranch manager complained to me about this.			X	
We encourage the installation of cattle guards on publicly traveled roads in the list of cost-effective range improvements that could be done “to implement grazing systems and meet the objectives of grazing plans.” A problem most ranchers experience, including us, is that grazing management plans are extremely difficult to follow when gates are not left the way they are found, usually a gate not closed, because it may not be understood why leaving gates open or closed is important.			X	
Grazing permits have long been a source of feed for livestock. The users have been good stewards of the land and resources. It is important that these lands remain available for livestock people to maintain viable operations and for good range management practices to be followed by all.	X			
In the past much of this land was overgrazed and little was done to remediate its condition. Now there is an awareness of overgrazing and the damage it causes to plant communities. In fact the cheat grass problem is due, in part, to overgrazing. If you want to establish healthy ecosystems you must establish strict guidelines for the number of cattle and their movement on each allotment. I have seen BLM allotments, east of Grand Junction, where the only plant species are grease wood and broom weed. More emphasis needs to be put on monitoring cattle so healthy plant communities can once again thrive.	X			
We recommend the Livestock Grazing Management program remain much the same way as it has been administered the last several years. The BLM Range Specialists work hard and are doing a good job. It appears to us that many of the items listed under “Future Management” are already being done. We stress that a good working relationship between the BLM and the Rancher is critical. With private and public lands mixed in the allotments it is to the benefit the land, wildlife, livestock, public and landowner to have well managed lands.	X			
“Identifying areas where allotments that become vacant could be used as common area relief pastures when forage is not available due to vegetation treatment or natural events (wildfire, drought, wildlife damage to forage)” sounds like a really good idea.	X			

Table E-12 Representative Comments for Livestock Grazing	Planning Classification <sup>1</sup>			
	A	B	C	D
Livestock grazing can be a beneficial tool for land management, but monitoring is a key component to ensure that the timing and stocking density is appropriate for the area. To assure no unintended degradation of rare plant populations and pristine plant communities, CNAP recommends that the effects of livestock management in designated ACECs be monitored for adverse impacts. Monitoring studies should be conducted on grazing allotments to evaluate the effects of allotment management plan/grazing permit and, if necessary, to further refine livestock grazing levels. We further recommend that the RMP include language allowing for adaptive livestock management based on monitoring results to allow for changes in grazing that would be compatible with the sensitive features found on ACECs. These adjustments may include limiting and potentially terminating grazing if determined that it is causing detrimental effects to sensitive and listed species.	X			
We ask that the RMP maintain the Whitewater Common Grazing Allotment as recommended in the BLM/City of Grand Junction's Land Health Assessment.	X			
Livestock grazing: The plan should identify areas where grazing has degraded the vegetation and wildlife habitat. Grazing levels should be reduced to sustainable stocking rates, and livestock should be excluded from riparian areas.	X			
Overall, cattle grazing permits on BLM ground are well managed, and most permits are in good condition. However, there are several permits that would benefit from a rotational grazing system or water improvements to help spread out cattle and improve vegetation in select areas for both wildlife and livestock. Utilizing a multiple use concept involving wildlife will greatly benefit wildlife and cattle when livestock grazing is managed for the health of the land. It is crucial that Rangeland Health Standards be met and management incorporates any attributes to make this goal achievable. Lawson BLM grazing permit west of the Colorado National Monument and north of DS Road could benefit from a better rotational grazing system. The permit is grazed annually in the spring. If grazing could be changed to either annual winter grazing, or a rotation between spring and fall grazing. Annual spring grazing reduces grass vigor and can lead to a decrease in perennial cool season grasses, and an increase in undesirable annuals such as cheat grass. Palisade BLM grazing permit bounded by Lewis's private land on the north and Sheep Creek on the west could benefit from a rotational grazing system of a later turn-in date. The permit is currently grazed annually with a turn-in date on or near May 1st • Annual spring grazing reduces grass vigor and can lead to a decrease in perennial cool season grasses, and an increase in undesirable annuals. A June or mid-June turn-in may allow for increased perennial grass vigor. It is recognized that a fall turnout would not be practical most years because of lack of reliable water sources for livestock. Fish Park and Van loan's Buck Pasture would both benefit from alternate watering systems for livestock, possibly by the use of water wells and/or piping system. A reliable water source in both places would allow for better utilization of the permit.	X			

Table E-12 Representative Comments for Livestock Grazing	Planning Classification <sup>1</sup>			
	A	B	C	D
Domestic sheep grazing allotments in bighorn sheep range or adjacent to bighorn sheep range (Black Ridge, De Beque or Battlements) may have negative impacts on bighorn sheep populations. We recommend that the BLM work with the DOW and the Woolgrowers Association to determine what effects if any having a grazing allotment next to big-horn sheep may have on the health and viability of the population if an allotment is proposed to be open by the BLM.	X			

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<b>Table E-13</b> <b>Representative Comments for Cultural, Heritage, and Paleontological Resources and</b> <b>Native American Religious Concerns</b>	<b>Planning</b> <b>Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
Infrastructure- If parents are uneducated on energy resources then I would like to see in our elementary schools a class and subject strictly addressing Native American practices of survival, their knowledge of how the universe natural (not man made) laws work and the interrelatedness of a group of people and how to broadens to other nations.				X
Respect for, excavation of, historical accounts of Native Americans [is important]. In northern California I experienced how all land must be excavated accounted for first before anything else. Teaching the Native American process, respecting their culture and land, bringing these truths and practices into elementary academia.				X
We recommend that Fruita and Rabbit Valley ACECs retain their classification as Class I paleontological areas and be managed for their scientific and educational resources.				X
Such areas that might interfere with any other activity should be excavated and cleared by an appropriate entity.	X			
Care should be taken to avoid frivolous claims for cultural, heritage, and religious areas; all such claims should be investigated by an unbiased but otherwise qualified entity.	X			
In the case of fossil-enhanced areas, consideration should be given to the rarity of the fossils, with collection and other activities allowed in areas with common fossils. Similarly, consideration should be given to the rarity of the artifacts in any archeologically enhanced area, with collection and other activities allowed in areas with common artifacts (such as chip sites).	X			
Effective road closure is a must, and needs to be liberally applied so as to reduce the damage and expansion of impacts in an area. In areas with high archaeological significance, road density should be limited and off-road use and camping restricted to areas that have been surveyed and that are not archaeologically sensitive. This includes Cactus Park, Nine Mile Hill, the Hunting Grounds, and Milbern Bench.	X			
long-term goals desired by Gateway Canyons and John Hendricks are: Preservation of areas of cultural resources including Native American art and settlements as well as dinosaur tracks and remnants. We encourage the BLM to appropriately designate these cultural areas as areas of critical environmental concern.	X			
With the highly fossiliferous sedimentary rocks in the Grand Valley and surrounding area, and the history of discovery here, the potential offered by this area for future important discoveries is beyond comparison to most places in the world! This area deserves significant protection! I suggest that areas where these formations are exposed be avoided for any major development. In particular, special attention HAS to be paid to the Morrison Formation, the Mancos Shale (Formation), the Mesa Verde Group (Formation), and the Green River Formation, for all of these formations have large outcrops in the Grand Valley and surrounding areas, and all contain abundant fossil material, especially vertebrates. If proposed for development at all, preliminary paleontological surveys should always be conducted in the aforementioned (and preferably all) formations, followed with monitoring during actual development, and follow-up surveys after the fact, as erosion caused by weather, along with human activity, is a continual force exposing new fossils at the surface. Also, continual monitoring of developed areas is needed to prevent vandalism and/or theft of the resource. This work should be conducted by qualified	X			

<b>Table E-13</b> <b>Representative Comments for Cultural, Heritage, and Paleontological Resources and</b> <b>Native American Religious Concerns</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
paleontologist as most fossils are subtle and difficult to recognize in the field, and are invariably missed by workers from other disciplines such as archaeology or the biological sciences.				
In what we are sure is an oversight: The Tabaguache Trail has not been shown on the cultural map as an historic route.	X			
Unless there are specific resource conflicts with recreation that are currently identifiable, the Access Fund suggests that the BLM use existing federal and state laws—instead of this RMP—to manage for the protection of natural and cultural resources.	X			
The proposed cultural resources areas identified should expand and include the historic trail portions in White Water and Orchard Mesa. It has been documented historically that the trail's origins were developed from Native American migration routes and hunting trails. Archaeological evidence exists but further survey and investigation would prove helpful in understanding and preserving the historical significance of the native peoples and their culture in the area. Of particular concern are the petroglyphs located on the Old Spanish Trail/Gunnison River Bluffs Trail off Coffman Road.	X			
FLPMA also recognizes the importance of "historical values" as part of the resources of the public lands to be protected. 43 U.S.C. § 1702(c). The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources. The lands governed by the Grand Junction RMP contain significant cultural resources, and there are important areas of overlap between the areas identified as rich in cultural resources and those containing wilderness characteristics, underscoring the added benefits of protecting these lands.	X			

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Table E-14 Representative Comments for Social and Economic Considerations	Planning Classification <sup>1</sup>			
	A	B	C	D
All of our society, and not just the typically more vocal special interest groups, must be considered when weighing considerations between proposed non- or limited-economic activities and private, commercial activities. In sensitive or controversial areas, perhaps decisions should be made by a vote of the people who reside in the County being affected.		X		
Consider the social and economic effects of urbanization in the Whitewater area on potential selenium and salinity loading on river users.	X			
Finally, consider the impact of a plan on the infrastructure of the local community.	X			
Small-Town Character - Collbran is a small rural community and values its small-town character. Decisions made regarding management of BLM lands surrounding the community should recognize this community value and serve protect this quality.	X			
Community Safety - Area residents feel safe in their small community with its low rates of crime. Activities on BLM lands that will draw transient residents or adversely affect community safety are not desired.	X			
The socio-economic impacts of oil and gas development must be fully accounted for in alternatives which include such development in these RMP revisions, including the boom and bust development cycles of this industry and environmental impacts of coalbed methane production. Oil and gas development has important impacts (both positive and negative) on the surrounding communities. These impacts need to be assessed accurately and completely by the BLM when considering any potential oil and gas development for the Grand Junction Field Office. We have attached a document entitled "The Economic and Social Impacts of Oil and Gas Development" which describes in detail some of these impacts, along with our recommendations for assessing the impacts and mitigating them.	X			
In general, when looking at the economic implications of various management alternatives, BLM should do a full accounting of the costs and benefits. To facilitate informed investment decisions about publicly owned wildlands, economic analysis must take into consideration both market and nonmarket benefits and costs (Loomis 1993). To account for the full array of market and nonmarket wildland benefits, economists have derived the total economic valuation framework (TEV). TEV is the appropriate measure to use generally when evaluating the benefits of conserving wilderness character and wildlands. Figure 1 summarizes the seven categories of wildland benefits (Morton, 1999).	X			
For the analysis of regional economic trends, the BLM should include an analysis of all sources of income, rather than relying solely on employment – which will dramatically overstate the importance of oil and gas industries to the local economy. A full accounting of income is necessary to an understanding of the important role that transfer payments and other sources of non-labor income, such as interest payments, rents, and profits have upon the regional economy. For example, in Colorado, investment and retirement income accounts for 23% of total personal income in the state. Therefore, an economic impact analysis that excludes non-labor income is totally inadequate and misleading.	X			

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Table E-15 Representative Comments for Public Health and Safety	Planning Classification <sup>1</sup>			
	A	B	C	D
In February, 2008, the Environmental Protection Agency provided the BLM with its comments on a revised drilling plan for the Pinedale Anticline in Wyoming, citing concerns about human health issues including elevated ozone levels and groundwater contamination, as well as visibility impacts in nearby Wilderness Areas. Consistent with its responsibilities under Section 309 of the Clean Air Act, EPA reviewed the analysis of impacts and gave the plan its worst possible rating. EPA recommended that BLM revise the plan to correct the problems identified by EPA. In its decision, the EPA stated: “[I]t is of utmost importance that the Revised Draft SEIS identify effective and enforceable mitigation strategies to ensure environmental and public health protection as the proposed 4,399 additional wells on the Pinedale Anticline are developed.” The BLM should do the same in the EIS for the Grand Junction RMP and any other major decision document where oil and gas operations will have a significant impact on human health. Oil and gas development is acknowledged to have potentially severe impacts on human health, as noted below, and the Draft EIS should incorporate a formal methodology to evaluate all health issues and potential mitigations. We therefore request that the BLM incorporate a Health Impact Assessment (HIA), which is a systematic, comprehensive methodology for assessing human health impacts, as part of the EIS.		X		
Stiff fines for illegal dumping			X	
The RMP will permit temporary, emergency closures of trails without public notice for purposes of resource protection, to protect public health and safety, to facilitate cooperative work and for volunteer work and mitigation.	X			
Users of public lands should be warned of potential hazards by appropriate signs in appropriate places along access roads into such areas. It should be assumed that common sense will prevail, but if not, and if someone does something foolish, neither the BLM nor private in holders should be held legally responsibly for any accidental injury or death that may occur.	X			
In addition, the City Fire Department is the Designated Emergency Response Authority (DERA) for emergency incidents involving hazardous materials in all of Mesa County and they are concerned about the transportation of these surface impoundment fluids from drilling sites to waste disposal locations. These fluids frequently have flammable and corrosive characteristics and if accidentally released during transport, could endanger people and the environment. Since transport of these fluids does not require DOT placarding, emergency response personnel do not have the benefit of a warning advisement placarding could provide.	X			
Consider the effect of selenium loading on domestic wells and landfills. With a consistent approach, we can prevent additional selenium and salinity loading and the potential for additional State and/or Federal controls and regulations. Members of the Selenium Task Force are available to meet with you to provide additional information concerning selenium and salinity issues associated with land use decisions at your convenience	X			
BLM must ensure that proposed development, especially oil and gas development, will not impact human health of the residents of Grand Junction and surrounding communities.	X			

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<b>Table E-16 Representative Comments for Noise</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
I would also like to have sound enforcement made a priority. The days of “louder is better” must end.	X			
<p>Preserving natural soundscapes</p> <p>We encourage the BLM to emphasize natural soundscape in all its recreation planning. We urge you to add soundscapes into the list of Quiet Use Outcomes and into the Settings Classification Matrix. This applies to recreationists such as hikers, equestrians, wildlife watchers, hunters, anglers, photographers, desire the natural soundscapes offered by the GJFO BLM land.</p> <p>We encourage the BLM to take a pioneering approach to evaluating and managing natural soundscapes in relation to motorized use, motor boats and airplane and helicopter recreation, as well as working with NPA to study sound dispersal in canyon country how that might affect quiet users, neighboring homeowners and wildlife habitat usability. We ask that the alternatives compare impacts of ORV noise on natural sound and other resources.</p> <p>We believe addressing soundscapes is required under Executive Order 11,644 (“E.O.”), as well as BLM regulations, and BLM guidance addressing “quiet recreation” and “natural soundscape,” including measuring the decibel (“dB”) levels of the natural soundscape; and (2) quantitative analysis of ORV dB levels on the natural soundscape which quiet recreationists seek. We ask that you evaluate ORV traffic volume, duration, and frequency as part of a noise analysis to established and monitor the attainment of targeted soundscape objectives.</p> <p>In many way soundscapes may be considered as valuable a resource as wildlife, fisheries, scenery, etc.</p>	X			

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Table E-17 Representative Comments for Drought Management / Climate Change	Planning Classification <sup>1</sup>			
	A	B	C	D
BLM should also include analysis of habitat viability in the context of climate change, which is expected to greatly impact the types and locations of species' habitats.	X			
Climate change is historical, with the debate being how much mankind is contributing to otherwise natural events. Implement no policy unless the majority of qualified scientists agree that such policy will indeed be beneficial.		X		
Interior Secretary Order No. 3226 specifically requires that the BLM “consider and analyze potential climate change impacts” when undertaking long-range planning exercises, including specifically “management plans and activities developed for public lands.” (emphasis added). We support the BLM’s recognition of the importance of analyzing the effects of its actions on climate change. Global climate change is now acknowledged to be a major consideration for effects of major federal actions. Recommendations: BLM must analyze the likely impacts of climate change on the resources within the Grand Junction Field Office and use this information to make decisions that best protect the resources in light of the most recent climate change science. Furthermore, BLM must analyze if and how its proposed planning activities will exacerbate climate change and take steps to mitigate these impacts.	X			

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Table E-18 Representative Comments for the RMP Process and Other General Comments	Planning Classification <sup>1</sup>			
	A	B	C	D
As noted elsewhere in these comments, BRC's members strongly encourage the agency to formulate an Alternative that focuses on providing a wide range of diverse recreation opportunity, including an Alternative that provides a wide range of diverse opportunity for motorized and mountain bike enthusiasts.	X			
NEPA requires the BLM to consider and evaluate a reasonable range of alternatives for oil and gas development. In order to comply with NEPA, BLM must consider a broad spectrum of alternatives in regards to which lands will be available for oil and gas leasing. A Draft RMP which leaves all the lands within the planning area open to oil and gas leasing or only allows for very slight differences between the alternatives in this regard fails to meet the "reasonable range of alternatives" directive. BLM has an obligation to rigorously explore and evaluate a range of alternatives.	X			
As you formulate the alternatives for the revisions to the GJ RMP, please ensure that all the alternatives provide for multiple land uses including recreation, range, wildlife habitat, and energy development.	X			
There is a need to analyze impacts on a larger scale to fully assess the cumulative impacts that are occurring. This RMP should address this concern by mandating that operators look at permitting through a GAP or Master Development Plan process that fully discloses impacts both on the surface and through time.	X			
We request the BLM comprehensively analyze and assess cumulative air quality impacts.	X			
The BLM should encourage operators in watershed areas to engage in community planning and should honor public/private partnerships like the Palisade/Grand Junction Watershed Plan.	X			
Work cooperatively with the County, State, and Federal Highway departments, with landowners, and with grazing permit holders to control these weeds, perhaps on a cost share basis.	X			
The BLM should wherever possible consider partnering with local communities to offer consultation in developing these activities on private land where it can be adequately managed and controlled and damage to the public's estate can be minimized. Therefore, recreation planning should account for impacts on an ecoregion's ecology and manage all forms of recreation in such a way that maintains the fundamental ecological nature and health of the broader landscape.			X	
Please also encourage and accept help and ideas from the off road community with respect to trail maintenance, regulation development, and enforcement. We are your eyes and ears out in the field.	X			

Table E-18 Representative Comments for the RMP Process and Other General Comments	Planning Classification <sup>1</sup>			
	A	B	C	D
Based on the BLM's current regulations governing cooperating agencies (43 C.F.R. Part 1600), cooperating agencies will have a very strong presence throughout the Grand Junction Field Office RMP planning process. In order to permit the public to better understand the roles of these agencies, we request that BLM identify those agencies and tribal and local government entities that have been granted cooperating agency status, and disclose the areas of expertise or other qualifications that form the basis of their cooperating agency status. Recommendation: The BLM should identify the agencies and tribal and local government entities granted cooperating agency status and post this information on the RMP revision website.	X			
Emphasize Cooperation between the BLM and the National Park Service (Colorado National Monument) Such cooperation could include a public lands information center in Fruita and Grand Junction, merging the cooperating associations and friends associations, designation of lands adjacent to the Monument and the BLM with shared management and improvements including trails, interpretive signage; coordinated staff and other functions. Consider cooperative agreements with the Museum of Western Colorado			X	
The Gateway Canyons recreation plan is the largest scale example to date of a Colorado BLM partnership with a major corporation. From the way that recreation options for Gateway are being framed and other indications it appears that the corporation is having a distinct imprint on the types and locations of recreation opportunities being planned for Gateway. We have concerns about the BLM initiating and designing a recreation plan in large part responding to demand being generated by a corporate partner. We recommend that the RMP make explicit how the BLM will maintain independent decision-making (MOUs, other agreements?) when working with partners such as Gateway Canyons, whose goals and missions may not be fully aligned with those of the BLM. On the subject of business partnerships, the Colorado BLM 2007 Recreation and Visitor Strategy states on page 13 that "opportunities for companies and community businesses ...must achieve management objectives, maintain recreation setting character and meet land health standards." In the RMP and elsewhere, we ask the BLM to be transparent in its communications with corporate, government and non-profit partners and make explicit any anticipated MOUs or agreements where a partner's mission is being balanced with the BLM's stewardship mission.	X			
CDOW also encourages the planning process, to consider utility of concepts such as: Definition of a CDOW consultation process and lease notification within critical habitat areas, and early, open and often communication with CDOW			X	
Recognize and include newly adopted municipal community and comprehensive plans by the City of Fruita (2008), the Town of Palisade (2008), the City of Delta (2008) and the City of Grand Junction (2009?). These plans should be reflected in the BLM Resource Management Plan.	X			
We also encourage BLM to provide comprehensive analysis of the potential direct, indirect and cumulative impacts of each alternative, on areas important to biodiversity conservation and on special status species. This planning process is an important opportunity to develop programs and strategies to conserve special status species, given the potential for increasing recreational use of the Gateway area. Steps	X			



Table E-18 Representative Comments for the RMP Process and Other General Comments	Planning Classification <sup>1</sup>			
	A	B	C	D
such as these will help to ensure that actions taken as part of this TMP do not inadvertently contribute to the need to list any special status species. Well-conceived systems that take into account all other resources such as those mentioned above will provide high quality recreation opportunities that allow people to access public lands in a variety of styles, while also ensuring long-term protection of landscape function and form. Poorly conceived systems, however, can result in detrimental and long-lasting effects to the landscape. Toward this end, it is essential that recreation and travel be managed within a regional, environmental and social context. Simply because the scope of the planning area is limited in size does not mean that the planning area's role in the greater ecoregion should be ignored.				
RMRI's most important recommendation to the BLM involves the Colorado BLM Land Health Standards. We believe that the RMP EIS and the Gateway Canyons recreation plan should take as their primary goal to comply with or exceed the BLM Land Health Standards pertaining to "Upland soils," "Riparian Systems," "Healthy, productive plant and animal communities," T & E species, and "Water quality." Recreation, mineral, utility corridor and other development should be contemplated only to the degree it does not conflict with the GJFO meeting these standards.	X			
Wildlife Seclusion areas and sensitive habitat should be identified before alternatives are selected for the RMP. The importance of seclusion areas has become critical recently with the increased level of development in the planning area. Areas that offer this value need to be prioritized and constraints prescribed to better protect the value over time. Management prescriptions such as NSO should be in place to acknowledge their importance, or the use of COAs to better control impacts should be utilized.	X			
The new plan should continue to follow the multiple use mandate for all BLM lands. Environmental protection and energy production are both desirable and necessary objectives of sound land management practices and should not be considered mutually exclusive priorities. As such, the RMP should not only address the environmental and socio-economic impacts of development but should also recognize the significant benefits of energy availability, reliability and security. Beyond these broad benefits, there are also significant specific economic benefits associated with bonus payments, royalties, direct and indirect taxes as well as jobs. By carefully considering the benefits as well as the impacts of developing a broad range of energy resources including wind, solar, oil and gas, coal, oil shale, hydroelectric and geothermal the BLM helps to ensure our quality of life and economic security.	X			
CDOE also encourages the planning process, to consider utility of concepts such as: Establishment of disturbance caps	X			
CDOE also encourages the planning process, to consider utility of concepts such as: Development of mitigation procedures	X			
CDOE also encourages the planning process, to consider utility of concepts such as: Management prescriptions defined on finer, more specific scale	X			
Energy leasing and the application for permit to drill approval process can exist while the Resource Management Plan is under revision. Please move forward with all projects using the existing Resource Management Plan while the new Resource Management Plan is being revised.	X			
A word about planning criteria and planning issues We understand that this is water under the bridge, but the agency's planners would	X			

Table E-18 Representative Comments for the RMP Process and Other General Comments	Planning Classification <sup>1</sup>			
	A	B	C	D
benefit by articulating the difference between a planning criteria and planning issue in the scoping materials.				
CDOW also encourages the planning process, to consider utility of concepts such as: Development of performance based and adaptive management standards	X			
While many public lands have come to be viewed as "user playgrounds", I believe that first and foremost consideration needs to always be given to not only conserving but also in many cases restoring the natural resources of our public lands....Given the time lag in responsiveness to managing our public lands, I find it essential that the BLM take a proactive approach that extends far beyond development of the resource management plan itself, to foreseeing, managing, and regulating present and future activities that have the potential for serious degradation and loss of such lands...	X			
All lands are equally important to our local quality of life. However, more attention must be given to the west desert area north of Fruita to the state line.	X			
[Areas of particular value] Gateway area- remote and wild (for here)	X			
[Areas of particular value] Uncompahgre Plateau – lightly used and beautiful	X			
[Areas of particular value] North of Hwy I-70 and N of 33 Road in Clifton, CO	X			
[Area particularly valued] Grand Mesa: Why mess it up. Leave it alone damn it! Its beauty and natural essence has more wealth than exploitation! I really feel for the home owners that choose such a beautiful place to live.	X			
Additionally, it is important to continue and consider new protection management for archaeological sites, riparian ecosystems, and endangered plants and animals habitats.	X			
Use scientific and fact based data for the RMP analysis. Do not allow emotional, political, and special interest group agendas to drive the process.	X			
Incorporate a broad use of mitigation options which consider site specific conditions, future development technologies, advances in best practices and integrated strategies offer a significant opportunity for less impact and improved mitigation over specific land use stipulations and prescriptive mitigation measures.	X			
When I attended the meeting in Collbran, officials shared that the writing of this plan and then the plan would stand for many years to come. AS a result, I'd like to see a plan that looks to preserve and reclamation the natural environment. BLM lands shouldn't be managed for drilling and oil/gas but rather for what can be preserved (quiet recreation, sensitive or endangered species) and managed after the fact environmentally sensitive uses. For uses that impact the environment, it is best to concentrate them while keeping in mind that mitigations must be put in place.	X			
We dislike additional land policies and believe the enforcement of existing ones will suffice.	X			

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	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
In general, planning should in a context of strong consideration to our rapidly growing U.S. and western states population. Twenty years from now, pressures on the environment from extractive uses, recreational needs, water and wildlife needs, etc., will be far greater than what the average person now can conceive.	X			
We believe educational publications and programs about the benefits of and the benefits for the various users of the BLM managed public lands would be very good. This might be accomplished by publications and programs supported by the BLM and the various users which include environmental groups, hunters, ranchers, ATV enthusiasts, hikers, mountain bikers and other user.	X			
<p>Including adaptive management provisions in the RMP would provide the GJFO with flexibility and structure to meet its mandate of ensuring the “health, diversity, and productivity” of the public lands. Depending on the level of detail that the GJFO integrates into the PPSV, BLM would already “automatically” be identifying some adaptive management provisions and thresholds. We would encourage the GJFO to incorporate the following adaptive management principles into the RMP.</p> <ol style="list-style-type: none"> <li>1. Allocate land uses conservatively. Consider allowing for less intense and extensive resource uses initially, and allowing for greater extent and intensity of uses over time should monitoring demonstrate that the planning area could support additional uses while still achieving goals for natural, biological, and other resources. It would be easier and more cost effective to increase resource uses over time if priority species and vegetation were doing better than expected, than to try to reclaim them and reduce resource uses if priority species and vegetation were not achieving goals.</li> <li>2. Quantify desired outcomes for the health of priority species and vegetation and other resources. Specific, quantified outcomes can give BLM clear sideboards for identifying land use allocations and a clear basis on which to monitor and adapt management. For example, a desired outcome that states something like, “Leave as undisturbed X patches of Y size of [vegetation type] at any one time,” would provide much clearer direction for allocating land uses than would a non-quantitative desired outcome such as, “Maintain large blocks of [vegetation type].” The PPSV workbook would be one possible tool to document the range of possibilities for desired outcomes for priority species and vegetation. BLM could quantify the definitions for “very good, good, fair, and poor” for individual indicators. See Sections II and III for more thoughts on how to develop quantitative objectives for species and vegetation.</li> <li>3. Identify monitoring priorities. Adaptive management depends on monitoring, as BLM is well aware. The PPSV can provide a useful organizational framework for identifying monitoring indicators and priorities, particularly effectiveness monitoring (e.g., how are our priority species and communities doing under certain management?). The indicators that the GJFO may identify as part of the Health Assessment could be prioritized and serve as monitoring priorities. As you may recall, the San Juan Public Lands Center completed a PPSV-like exercise for their planning effort. See Attachment 2 for an excerpt of their monitoring appendix.</li> <li>4. Identify thresholds for management change. As the Land Use Planning Handbook states, “A monitoring strategy must be developed...that identifies indicators of change, acceptable thresholds, methodologies, protocols, and timeframes that will be</li> </ol>	X			

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used to evaluate and determine whether or not desired outcomes are being achieved” (p.33. Italics added). As mentioned previously, the PPSV could be used to identify thresholds. For example, BLM could state that if the rating for a particular indicator shifts downward from good to fair, then a management change should be initiated.				
<p>NEPA requires BLM to “rigorously explore and objectively evaluate” a range of alternatives to proposed federal actions. See 40 C.F.R. §§ 1502.14(a) and 1508.25(c). NEPA’s requirement that alternatives be studied, developed, and described both guides the substance of environmental decision-making and provides evidence that the mandated decision-making process has actually taken place. Informed and meaningful consideration of alternatives -- including the no action alternative -- is thus an integral part of the statutory scheme. <i>Bob Marshall Alliance v. Hodel</i>, 852 F.2d 1223, 1228 (9th Cir. 1988), cert. denied, 489 U.S. 1066 (1989) (citations and emphasis omitted). An agency violates NEPA by failing to “rigorously explore and objectively evaluate all reasonable alternatives” to the proposed action. <i>City of Tenakee Springs v. Clough</i>, 915 F.2d 1308, 1310 (9th Cir. 1990) (quoting 40 C.F.R. § 1502.14). This evaluation extends to considering more environmentally protective alternatives and mitigation measures. See, e.g., <i>Kootenai Tribe of Idaho v. Veneman</i>, 313 F.3d 1094, 1122-23 (9th Cir. 2002) (and cases cited therein); see also <i>Env’t Defense Fund., Inc. v. U.S. Army Corps. of Eng’rs</i>, 492 F.2d 1123, 1135 (5th Cir. 1974); <i>City of New York v. Dept. of Transp.</i>, 715 F.2d 732, 743 (2nd Cir. 1983) (NEPA’s requirement for consideration of a range of alternatives is intended to prevent the EIS from becoming “a foreordained formality.”); <i>Utahns for Better Transportation v. U.S. Dept. of Transp.</i>, 305 F.3d 1152 (10th Cir. 2002), modified in part on other grounds, 319 F.3d 1207 (2003); <i>Or. Env’tl. Council v. Kunzman</i>, 614 F.Supp. 657, 659-660 (D. Or. 1985) (stating that the alternatives that must be considered under NEPA are those that would “avoid or minimize” adverse environmental effects).</p> <p>NEPA requires that an actual “range” of alternatives is considered, such that the Act will “preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished by only one alternative (i.e., the applicant’s proposed project).” <i>Colorado Environmental Coalition v. Dombeck</i>, 185 F.3d 1162, 1174 (10th Cir. 1999), citing <i>Simmons v. United States Corps of Engineers</i>, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the EIS from becoming “a foreordained formality.” <i>City of New York v. Department of Transp.</i>, 715 F.2d 732, 743 (2nd Cir. 1983); see also <i>Davis v. Mineta</i>, 302 F.3d 1104 (10th Cir. 2002). Given the broad purpose of the preparation of the Grand Junction Field Office RMP and the information compiled by the public regarding lands with wilderness characteristics, the range of alternatives for these lands should include alternatives to protect their wilderness values. This range of alternatives is also consistent with BLM’s FLPMA obligations to inventory its lands and their resources, “including outdoor recreation and scenic values” (43 U.S.C. § 1711(a)), which by definition includes wilderness character. FLPMA also obligates BLM to take this inventory into account when preparing land use plans, using and observing the principles of multiple use and sustained yield. 43 U.S.C. § 1712(c)(4); 43 U.S.C. § 1712(c)(1). Through management plans, BLM can and should protect wilderness character and the many uses that wilderness character provides on the public lands through various management decisions, including by excluding or limiting certain uses of the public lands. See 43 U.S.C. § 1712(e). This is necessary and consistent with the definition of multiple use, which identifies the</p>	X			

<p align="center"><b>Table E-18</b></p> <p align="center"><b>Representative Comments for the RMP Process and Other General Comments</b></p>	<p align="center"><b>Planning Classification<sup>1</sup></b></p>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>importance of various aspects of wilderness character (such as recreation, wildlife, natural scenic values) and requires BLM’s consideration of the relative values of these resources but “not necessarily to the combination of uses that will give the greatest economic return.” 43 U.S.C. § 1702(c).</p>				
<p>There are at least a few information sources:</p> <p>Vegetation reports (“ecological system reports” or “integrity specifications”) from CNHP. These reports are available for nearly all key vegetation types in Colorado. They include criteria for evaluating the integrity of vegetation patches, including but not limited to patch size. <a href="http://www.cnhp.colostate.edu/projects/eco_systems/eco_systems.html">http://www.cnhp.colostate.edu/projects/eco_systems/eco_systems.html</a></p> <p>Maps of intact patches of matrix ecosystems across Colorado from CNHP. BLM could use this data to, for example, identify the relative significance of the patches within the GJFO from a statewide perspective. In other words, BLM could compare the size of the patches of particular vegetation types within the GJFO to those outside the GJFO. As you may recall, CNHP placed the files related to this project on an ftp site for the GJFO: <a href="ftp://cnhp.colostate.edu/Projects/Scorecard">ftp://cnhp.colostate.edu/Projects/Scorecard</a>, though it looks as though some of the data (e.g., GIS layers) are not there anymore. Contact Karin Decker with questions.</p> <p>Landscape integrity analysis from CNHP and TNC. This fragmentation analysis could be used to identify relatively intact blocks of habitat within the GJFO, and provides a basis for comparison statewide. Methodology and/or maps available upon request. Contact Kei Sochi, <a href="mailto:ksochi@tnc.org">ksochi@tnc.org</a>.</p> <p>Ecoregional assessments from TNC. These peer-reviewed, science-based assessments contain information that BLM may find useful in setting goals and allocating land uses. For example:</p> <ol style="list-style-type: none"> <li>a. Tables of estimated percent change of ecological systems (i.e., vegetation types) in extent since 1850. BLM may want to focus greater management attention on the vegetation types which have decreased the most in extent over time (see Attachment 4).</li> <li>b. “Conservation areas” which are identified based on specific goals for vegetation, species, and natural communities. A network of conservation areas across an ecoregion should, if managed to conserve and restore native plant and animal communities, conserve the full range of biological resources of an ecoregion. BLM could consider these areas when identifying land use allocations. For example, given the choice of allocating a given land use inside vs. outside the boundaries of a conservation area, all else equal it would be preferable from an ecological perspective to allow for the use outside of the areas.</li> </ol> <p>The ecoregional assessments that pertain to the GJFO include:</p> <ul style="list-style-type: none"> <li>- Colorado Plateau - available at <a href="http://azconservation.org/projects/ecoregions/">http://azconservation.org/projects/ecoregions/</a></li> <li>- Southern Rocky Mountains - <a href="/coldocs/2002/02/SRMreport.pdf">/coldocs/2002/02/SRMreport.pdf</a></li> <li>- Utah High Plateaus (Unpublished report but data is available. Contact Betsy Neely, <a href="mailto:bneely@tnc.org">bneely@tnc.org</a>).</li> </ul> <p>For general information about Ecoregional Assessments, see <a href="http://conserveonline.org/workspaces/cbdgateway/era/index_html">http://conserveonline.org/workspaces/cbdgateway/era/index_html</a>.</p>	X			
<p>BLM’s internal guidance states that “each RMP will divide planning areas into OHV area designations that are open, limited or closed.” IM</p>	X			

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	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>No. 2004-005; see also 43 C.F.R. § 8342.2(b). This internal guidance was also incorporated into the updated version of BLM's Land Use Planning Handbook. H-1601, Appendix C, Section II.D (Comprehensive Trails and Travel Management). The Land Use Planning Handbook states that BLM should:</p> <p style="padding-left: 40px;">Complete a defined travel management network (system of areas, roads and/or trails) during the development of the land use plan, to the extent practical. If it is not practical to define or delineate the travel management network during the land use planning process, a preliminary network must be identified and a process established to select a final travel management network. (emphasis added)</p> <p>Furthermore, Colorado IM No. CO-2007-020 directs Colorado BLM Field Offices to complete comprehensive travel management plans as part of the RMP process:</p> <p style="padding-left: 40px;">Nationally, BLM is moving towards a system of limiting use to designated roads, primitive roads and trails/areas and not encouraging extensive cross-country travel by motorized and mechanized vehicles. Current planning guidance (H-1601-1, Land Use Planning Handbook – Appendix C, Section D, attachment 2) requires identifying a defined travel management network system of areas, roads, primitive roads and trails, in all Land Use Plans. It is our expectation that each RMP Record of Decision will include a system of designated routes for those areas in the limited category.</p> <p>The Land Use Planning Handbook (Appendix C, Section II.D) also sets out requirements for travel management at both the land use and implementation planning levels:</p> <ul style="list-style-type: none"> <li>- At the land use plan level, BLM must identify areas for use based on program goals and objectives, primary users, reason for “allowing travel” into an area, setting character to be maintained (including Visual Resource Management and Recreation Opportunity Spectrum classifications), and primary means of travel appropriate to meet objectives and keep setting character; and</li> <li>- At the implementation level, BLM must define a detailed travel management network, “establish a process” to identify roads, trails, etc. with criteria for selections, guidelines for management, monitoring and maintenance, and indicators for future plan maintenance.</li> </ul> <p>If the agency does not complete travel management plans for all of the planning areas as part of the RMP, then the RMP must identify not only areas for use, but also reasons for permitting travel into an area and appropriate criteria for determining routes that will be made available for different uses, taking into account such factors as undeveloped recreation opportunities available and natural settings.</p>				
<p>The RMP will not set a specific deadline for the completion of implementation. The RMP, however, will state that the BLM hopes to complete the process as quickly as possible.</p>	X			
<p>To ensure that the BLM meets the multiple use management requirements set out in FLPMA, it is critical that the agency use information it has or is provided regarding other resources values, such as wilderness character and wildlife habitat, to create management prescriptions which address protection of these resources and would, as a result, also serve to enhance experiences dependent upon or supported by the presence of naturalness and/or healthy wildlife populations. To this end, recommended management prescriptions</p>	X			

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	A	B	C	D
include, the adoption of multiple SRMAs, the designation of a variety of RMZs, and or the creation of additional management prescriptions within these RMZs.				
BLM's preliminary issues are deficient in excluding consideration of the Data Quality Act, Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, and related Department of Interior Information Quality Guidelines and BLM Information Quality Guidelines. The DOI guidelines provide at II.5 that during public comment procedures requests for correction will be considered and provide at III.4 that a request for correction not made during the draft stage may be considered "to have no merit" if the bureau or office determines that the requester had the opportunity to comment ..." BLM's Preliminary Planning Issues fail to advise the public of its opportunity to comment regarding data quality. In order to comply with the Data Quality Act, draft alternatives must be based upon data of "sufficient transparency and methodology." In order for the public to comment on proposed alternatives, it must know the information bases for specific actions proposed therein. Therefore, the agency must, at the draft stage, publicly document the scientific literature or other information upon which it intends to support each alternative, if it is adopted. The public must be allowed to challenge insufficient data before a final alternative is selected. BRC intends to challenge alternatives, or elements thereof, that are based on junk science or anecdotes.	X			
The National Environmental Policy Act (NEPA) requires the agency to look at the direct, indirect and cumulative effects of management alternatives, consider more environmentally protective approaches and assess opportunities for mitigating impacts.	X			
Maintain the distinctive open space character of Grand Junction BLM lands – in accordance with the 2007 BLM Recreation and Visitors' Strategy. Many portions of Grand Junction BLM lands, not just WSAs and proposed wilderness, fall into the more primitive category of BLM lands that are particularly at risk for losing their "distinctive, rugged, remote open space character" as described in the State BLM 2007 Recreation and Visitors' Service Strategy. The 2007 Colorado BLM Recreation and Visitor Services Strategy calls for retaining the "distinctive character" and "wide open spaces" of Colorado BLM lands (p.3). The Strategy emphasizes the "need to maintain the distinctively undeveloped and open space character of [the BLM's] recreation settings," p. 7. The Strategy expresses the BLM intention to shift its focus to settings and user experience and away from "activities that could allow the distinctive landscape character, [including] more primitive, natural-looking and undeveloped recreation settings to change" (p. 4). A 2007 State BLM Instruction Memorandum further directs BLM managers to: "Ensure that travel management decisions...maintain prescribed setting character..." (p. 2). In accordance with this guidance, we encourage the Grand Junction BLM in its RMP to avoid the downsliding of recreational settings into more developed categories and keep settings in the primitive and backcountry category wherever they exist.	X			

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	A	B	C	D
The BLM has received directives from the President and Congress to implement the nation's strategy for wireless communications. These directives include (1) an Executive Memorandum; (2) the Telecommunications Act of 1996; and (3) a General Services Administration Bulletin. The BLM's Washington Office subsequently issued an Instruction Memorandum providing guidance to its field offices on rights-of-way planning. President Bush issued an Executive Memorandum reiterating the importance of expanding the deployment of telecommunications infrastructure on federal lands.	X			
The BLM should ensure that the EIS and revised RMP for the Grand Junction Resource Area is consistent with the policies of other governmental entities.	X			
The information sources below could be used to inform regional context analyses, the identification of known occurrences of globally imperiled species and plant communities; the identification of habitats important for wildlife species of concern; etc: <u>Element Occurrence Records from CNHP</u> . We understand that CNHP provided the GJFO with lists of conservation elements for incorporation into NatureServe Vista. The GJFO could obtain the latest numbers of occurrences for these elements from CNHP, for within and outside of the GJFO planning area in Colorado. NatureServe maintains information for numbers of occurrences across multiple states. <u>Priority Conservation Areas (PCAs)</u> from CNHP. BLM could also consider using (if it hasn't already) PCAs to inform goals for species and land use allocations (e.g., special designations). A PCA represents CNHP biologists' best estimate of the primary area required to support the long-term survival of species or communities of interest or concern. As you are probably aware, GIS layers of PCAs are publicly available at <a href="http://www.cnhp.colostate.edu/gis.html">http://www.cnhp.colostate.edu/gis.html</a> . <u>Sample Regional Context Analysis for Species</u> from TNC to the San Juan Public Lands Center (Attachment 5). <u>Best Management Practices (BMPs)</u> . BMPs can inform mitigation options for species (and vegetation too for that matter). A couple newer sources of BMPs include those that the Colorado Rare Plant Initiative is developing for oil and gas drilling in rare plant habitat (BLM is a partner of this effort; contact Carol Dawson at the BLM State Office), and those that the University of Colorado's Natural Resources Law Center is consolidating from a variety of sources into an online database ( <a href="http://www.colorado.edu/law/centers/nrlc/projects/bmpDemo/">http://www.colorado.edu/law/centers/nrlc/projects/bmpDemo/</a> ). <u>Natural Diversity Information Source</u> from the Colorado Division of Wildlife. <a href="http://ndis.nrel.colostate.edu/">http://ndis.nrel.colostate.edu/</a> . <u>Species Assessments</u> from the U.S. Forest Service. <a href="http://www.fs.fed.us/r2/projects/scp/assessments/index.shtml">http://www.fs.fed.us/r2/projects/scp/assessments/index.shtml</a>	X			
Address the full mitigation hierarchy – avoid, minimize, reclaim, and offset I - to help ensure the mitigation of impacts from resource uses to natural and biological resources such as priority species and vegetation. We would urge the GJFO to incorporate clear reclamation standards into the RMP such as those included in the Little Snake Draft RMP, Appendix O (Attachment I). We strongly encourage BLM to include language for supporting future offsets. The Record of Decision for the Northern San Juan Basin Coalbed Methane Project	X			



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	A	B	C	D
provides sample offset language specific to natural gas development: “Operators will have the flexibility to develop mitigation measures that effectively address the potential environmental effects....These measures could include restrictions on drilling and production operations, establishment of surface owner mitigation funds, off-lease surface resource mitigation, etc.” (Italics added. See p.23, <a href="http://www.fs.fed.us/r2/sanjuan/projects/ea/nsjb/nsjb-rod.pdf">http://www.fs.fed.us/r2/sanjuan/projects/ea/nsjb/nsjb-rod.pdf</a> ).				
BLM must consider the following when deciding which areas to allow fluid mineral leasing and development: 1) the BLM has a multiple use mandate and must manage its lands for a variety of uses, not primarily for oil and gas development. 43 U.S.C. § 1712(c)(1); 2) BLM must consider a reasonable range of alternatives in regards to areas open to oil and gas leasing. 40 C.F.R. § 1502.14; and 3) any decision which leaves the vast majority of the Field Offices open to oil and gas development will preclude the effectiveness or long term viability of any conservation measures as there is always the potential that those conservation measures could be jeopardized by oil and gas development, regardless of how low the potential for development is currently.	X			
Recommendation: In considering the need and ways to manage these lands to protect the many resources of these public lands, the agency must consider the cumulative impacts from regional oil and gas development and the cumulative impacts to adjacent lands from oil and gas development. This analysis should inform the manner in which BLM allocates lands as available or unavailable for oil and gas development and the conditions under which development may be permitted.	X			
BLM must ensure compliance with the Energy Policy Act of 2005, the Energy Policy Conservation Act of 2000 (EPCA), the National Energy Policy, and Executive Order Number 13212, 66 Fed. Reg. 28357 (May 18, 2001), to reduce rather than increase impediments to federal oil and gas leasing and development.	X			
Planning-level NEPA analyses, such as RMPs, provide direction for broad resource management may be the basis for future leasing decisions. These plans provide the how, when and where for oil and gas operations. At the resource management planning level. a quantitative approach which includes air dispersion modeling may be necessary to provide the decision-maker with the level of information necessary to support the decision-making process. The air quality analysis should provide the decision-maker with the information to guide planning decisions such as: whether additional leasing (and the likely development authorized by such leasing) can proceed without impacting National Ambient Air Quality Standards (NAAQS) and air quality related values, such as visibility; the rate of oil and gas leasing or development; appropriate leasing stipulations; and/or necessary mitigation measures to include in drilling permits, The appropriate level of air quality analysis at the management planning stage will help to ensure that proper, proactive steps are taken to minimize adverse impacts to air quality. In RMPs that plan for significant oil and gas development, EPA maintains that air quality dispersion modeling should be conducted to assess the direct and cumulative impacts of projected energy development on air quality values within and outside of the planning area. The qualitative emission comparison approach is not specific enough to adequately address and predict air quality impacts from oil and gas	X			

<b>Table E-18 Representative Comments for the RMP Process and Other General Comments</b>	<b>Planning Classification<sup>1</sup></b>			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<p>development. While the qualitative emission comparison approach provides a means to compare the total predicted emissions of each alternative to a baseline year, it does not provide any indication of the potential for exceedances of ambient air quality standards or the potential for adverse impacts on air quality related values (i.e., visibility) in nearby Class I areas. In reviewing planning-level NEPA documents, EPA Region 8 typically considers the following factors in determining the appropriate level of air quality analysis. These factors, while not exclusive, and which may vary from project to project, provide some indication of the potential for air quality impacts to occur from management plans that provide for oil and gas leasing and/or development.</p> <ul style="list-style-type: none"> <li>• Number of projected oil and gas wells based on estimated energy resources and reasonable well density.</li> <li>• Distance of the planning area or projected well development areas from Class I air sheds.</li> <li>• Distance from other sensitive receptors (i.e., National Parks, Class H areas and population centers).</li> <li>• Distance from areas approaching a National Ambient Air Quality Standard (NAAQS) &lt; This is particularly important for ozone and fine particulate matter (PMs) in the West</li> <li>• Availability of recent, relevant, and comprehensive air quality modeling data prior to management planning Draft EIS.</li> <li>• Whether relevant, comprehensive and cumulative air quality analysis is concurrently completed with a project-specific EIS in the management planning area.</li> <li>• Potential for cumulative adverse impacts to air quality from projects in adjacent planning areas.</li> </ul> <p>The potential for categorical exclusions under Section 390 of the Energy Policy Act further emphasizes the need for BLM to analyze the air quality impacts and to identify appropriate mitigation measures at the RMP/EIS stage, Section 390 of the Energy Policy Act of 2005 established five statutory categorical exclusions under NEPA including an exclusion for ; “drilling an oil and gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as reasonably foreseeable activity, so long as such plan or document was approved within five years prior to the date of spudding the well.” A qualitative emissions comparison approach would not provide BLM "With the information necessary to predict potential air quality impacts and identify appropriate mitigation measures.</p> <p>While the NOI identified energy and mineral resource exploration and development as a key issue for the Grand Junction RMP revision, it does not include an estimate of the reasonably foreseeable development. Until the reasonably foreseeable development for the Grand Junction Resource Management Plan area is calculated, it is difficult to definitively identify the appropriate level of air quality analysis. As the NEPA analysis proceeds, EPA would like to continue discussions with BLM the air quality analysis planned for this RMP/EIS.</p>				
<p>Given the importance of the reasonably foreseeable development scenario ("RFD") for a leasing Environmental Impact Statement, we encourage the Bureau of Land Management to release and accept comments on the RFD Scenario prior to its inclusion in the Draft EIS. Doing so will allow the BLM the opportunity to gather information from industry and the public regarding the reasonableness and the assumptions made in the RFD Scenario before it is fully incorporated into the Environmental Impact Statements for the Grand Junction</p>	X			

Table E-18 Representative Comments for the RMP Process and Other General Comments	Planning Classification <sup>1</sup>			
	A	B	C	D
Field Office.				
Recommendation: The analyses discussed in these scoping comments must be completed prior to authorizing activities that will contribute to these impacts, such as oil and gas leasing, in order to determine whether and under what conditions they can be approved, such that significant impacts on the environment can be prevented. To the extent that the BLM defers any of the recommended analyses, we request that the RMP commit to a time period for completion and confirm that they will be completed prior to approval of contributing activities.	X			
We encourage BLM to maximize public involvement in preparation of the revised Grand Junction RMP.	X			
CDOW recommends: Rigorous assessment of cumulative impacts and determination of threshold triggers.	X			

<sup>1</sup> Planning Classification Key:

- A – Planning issues to be addressed in the RMP
- B – Addressed through BLM policy or administrative action (National and BLM policy)
- C – Issue addressed or to be addressed by the GJFO outside of the RMP process
- D – Issue outside of the scope of the RMP; considered but not addressed

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