



IN REPLY REFER TO:

1610

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Grand Junction Field Office

2815 H Road

Grand Junction, Colorado 81506

April 10, 2015

ERRATA SHEET

Corrections to Grand Junction Field Office Proposed Resource Management Plan and Final Environmental Impact Statement (BLM/CO/PL-12/004)

After printing of the Grand Junction Field Office Proposed Resource Management Plan and Final Environmental Impact Statement, but prior to public release, the BLM identified the following corrections to the proposed plan. These corrections have been made to the electronic PDF files on the website:

- Volume IV Appendix A, Figure 2-23 should show Bangs Canyon Special Recreation Management Areas, Recreation Management Zone 4 polygon and the Unawep lands with wilderness characteristics unit as limited to designated routes for motorized and mechanized vehicles (open to foot and horse).
- Volume I, Chapter 1, Page 1-24 seventh bullet should state “In response to public comments, the Bangs lands with wilderness characteristics unit (19,600 acres) was added to list of areas managed to protect wilderness characteristics.”
- Volume III, Chapter 6, 6-130 third sentence should state “The Wilderness Character Inventory Update used best available information using a combination of GIS, maps, and interviews with knowledgeable staff consistent with Manual 6310.”
- Submission number emc0979 from Jill Comstock on behalf of the Residents of East Orchard Mesa Near 34 and C Road was mistakenly omitted from Chapter 6, although the BLM did consider it fully during preparation of the Proposed RMP/Final EIS. The comments and the BLM’s responses are as follows:

Submission No.: emc0979

Commenter: Jill Comstock (Residents of East Orchard Mesa Near 34 and C Road)



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Comment: Appendix K, Table 20, ERMA. P K60, it states that there will be an Open Area of 330 acres and a Target Shooting Area of 220 acres. Apparently the ERMA is supposed to be 550 acres. It would seem that the 600 acres refer to the area encompassed by the "no shooting closure", a portion of which is included in the ERMA Open Area (330 acres). This is not clearly stated. The use of varying figures and incomplete descriptions associated with these acreages in the RMP make it difficult to discern which actions are being applied to the different tracts of land.

Recommendation: We suggest that the correct figures be given with a complete description of what activities can or cannot occur on the ERMA and surrounding lands at 34 and C Road.

Response

The use of 600 acres in the Draft RMP/EIS was due to rounding GIS data to the nearest 100 acres. Acreages for the Horse Mountain ERMA (which includes the 34 and C Road area) have been made consistent throughout the Proposed RMP/Final EIS. Also see page 2-205 in the Proposed RMP/Final EIS for a detailed description of proposed management in the Horse Mountain ERMA.

Submission No.: emc0979

Commenter: Jill Comstock (Residents of East Orchard Mesa Near 34 and C Road)

Comment: P 2-132,133-Table 2-2 Recreation, Alt B: 34 and C Road ERMA-Allowable Use; closed to camping and overnight use from 11 PM to 5AM. We support the camping and overnight use closure but would recommend the hours of closure be from sunset to sunrise. There are no legitimate uses that occur during the "dark" hours that could be considered safe. There is a significant portion of the year (4 months) where darkness occurs inside of the proposed 11 PM to 5 AM closure. Aside from predator hunting, which requires a permit, and would not likely be issued for the ERMA, most other activities that occur involve social gatherings involving alcohol or drugs that have led to innumerable problems in the past. Use of ATV and vehicles on the existing terrain is dangerous at night as well. Based on the specific management guidelines for ERMA it would seem that the above uses would be considered "non-compatible uses, especially during the hours of darkness. While there is no restriction on predator hunting at night (a permit is required from CPW), it does not make sense to allow an activity that uses firearms at night in an area closed to firearms during the day. It becomes more of a safety issue at night because of limited visibility of the surroundings and residences. In addition there are plenty of areas outside of the 34 and C Road ERMA available for this activity. P2-135, Table 2.2, Allowable Use, Firearm Use: States that there is 1, 021,400 acres of BLM land open to discharge of firearms for



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recreational target shooting. Most of this same acreage is open to night predator hunting with the proper permits. Closing the ERMA and associated no shooting area would also help control resource damage (plants and soil) to the area caused by inadvertent or intentional off-roading in the darkness. Closure might also alleviate the amount of trash and litter currently being left by those frequenting the area after dark.

Recommendation: 34 and C Road ERMA-Allowable Use: Closed to camping and overnight use from sunset to sunrise.

Submission No.: emc0979

Commenter: Jill Comstock (Residents of East Orchard Mesa Near 34 and C Road)

Comment: P2-135-136, Table 2-2, Allowable Use, Firearm Use Restrictions: The RMP states that the restriction is to protect visitor safety and by minimizing potential for accidental shootings and to protect sensitive resources (43 CFR 8364.1) The RMP fails to mention that it is also for the safety of the residents who live nearby on the lands immediately adjacent to the BLM. As previously noted residents continue to have bullets flying overhead and striking their homes. The implementation of a 600 acre no shooting area at this urban interface is a positive management action that we support. Of the 600 acres, 330 acres lies within the ERMA classed as Open Area. It is assumed that the 600 acre closure proposed is adequate. However, in looking at the location of the residences in relation to the no shooting area and the target shooting area, adequate protection is lacking in some instances. There are two locations southwest of the proposed "no shooting area" that need to be addressed to provide adequate protection for the residences of the 34 and C Road area. One area is the Comstock residence located in the SW 1/4 of Section 30 (Parcel Number 2941-303-001). This residence is surrounded by BLM to the east and south and is outside of the proposed "no shooting area". This same residence has been the unfortunate recipient of several stray bullets (see attached reports and photos). While implementation of the proposed "no shooting area" provides some protection for this residence the BLM lands to the east and south are wide open to all activity including shooting. The shooting closure will push more shooters into this area increasing the risk for accidents not only for the Comstock residence but all of the residents to the north and south of this narrow strip of BLM land surrounded by private land that extends into the SE 1/4 of Section 25. There is a Ute water tank located in this area and numerous residences adjacent to BLM lands north of this BLM strip. There are at least six residences that are within 1/4 mile and a dozen or more beyond along C Road. This strip of land is atop a mesa which has no hillsides to stop bullets discharged from firearms making for a very unsafe situation. P2- 135 Table 2-2 states that Allowable Use for firearms discharge is as follows: "The discharge of firearms for recreational target shooting is permitted on BLM lands outside of areas with firearm use restrictions, provided that the firearm is discharged toward a proper backstop sufficient to stop the



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projectile's forward progress beyond the intended target". As mentioned there are no natural backstops (hillsides) to stop a bullet here. The addition of these lands to the "no shooting area" would be consistent with the rationale for the proposed "no shooting area". In addition to the Comstock residence, the Wheeler residence located in the NE 1/4 of Section 31 (Parcel Number 2941-3 11-00-209 lies near an unprotected area near to the proposed Target Shooting Zone of the ERMA. Again there is an area of BLM between the "no shooting area" and the "shooting area" that needs protection. Most of what needs to be protected lies below (west) the ridgeline of the proposed "shooting area" and in the small gulch below the same ridge.

Recommendation: In order to provide safety for the 34 and C Road residents near the open BLM lands in Section 25 and 30, it is recommended that the current "no shooting" boundaries be adjusted to include those BLM lands located southwest and adjacent to the current ERMA; beginning along Wilson Blvd at the northernmost SW corner of the ERMA, extending southeast to the corner of the private property in Section 31, then west to encompass the narrow strip of BLM lying to the west of Wilson Blvd. In addition there is a triangle of open BLM land between the "no shooting area" and "shooting area" that should be adjusted to provide safety for the Wheeler residence. A portion of the proposed "shooting area" west and below the ridge including the small gulch should be included in the "no shooting area".

Response

The BLM agrees that public safety and resource concerns cited by the commenter warrant closure to camping, overnight use, and recreational target shooting as requested. See pages 2-174, 2-180, 2-213 through 2-216, 3-245, 4-332 through 4-333, and Figure 2-81, in the Proposed RMP/Final EIS.

- Volume IV Appendix A, Figure 2-16 should show a slightly different polygon for RMZ 3 of the Horse Mountain ERMA. A narrow "finger" of land extending northwest from the main polygon was added to provide additional short-range recreational target shooting opportunities. That extension is accurately represented in the No Shooting Area polygon shown in Figure 2-83 (however at the scale of the PDF map it is difficult to see). The RMZ 3 polygon in Figure 2-16 should align with the corresponding No Shooting Area polygon in Figure 2-83.
- The commenter organization names for submission emc0536 that is included Volume III Chapter 6, was improperly cited. The commenter name is listed as Boone and Crockett Club instead of the full list of organizations that submitted this comment. Submission emc0536 was provided by the signatory organizations of the Federal Lands Hunting, Fishing and Shooting Sports



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Roundtable, which includes the Boone and Crockett Club, Campfire Club America, Congressional Sportsmen's Foundation, Conservation Force, Masters of Foxhounds Association, National Rifle Association, National Shooting Sports Foundation, North American Bear Foundation, Public Lands Foundation, Quality Deer Management Association, North American Grouse Partnership, Safari Club International, Wildlife Management Institute. The commenter name for this submission should have been listed as "Federal Lands Hunting, Fishing and Shooting Sports Roundtable Signatory Organizations".

- A portion of the submission by the Federal Lands Hunting, Fishing and Shooting Sports Roundtable was mistakenly omitted from Chapter 6, however the BLM did consider it fully during preparation of the Proposed RMP/Final EIS. The comments and the BLM's responses are as follows:

Comment

Submission No: emc0536

Commenter: ~~Boone and Crockett Club~~ Federal Lands Hunting, Fishing and Shooting Sports Roundtable Signatory Organizations

Comment: In addition, the Respected Access campaign promotes packing out what you packed in which would include targets, spent shells, food wrappers, etc. The RMP/EIS states in Chapter 2 Alternatives page 135 that "All targets, clays and shells are considered litter after use and must be removed and properly discarded." We are concerned over how literally and consistently this will be enforced. We believe that a good faith effort to pick up clays and spent shells is the proper standard. It is impossible and unreasonable to expect a shooter to recover every shell or shot that falls to the ground and every shard or fragment of a clay target.

The BLM further states that targets "shall be constructed of wood, cardboard, and paper or similar nonbreakable materials (emphasis added). Clays are designed to break apart so it is unclear if their use is allowed, in spite of what is stated about clean-up of clay targets. We recommend that clay targets be included in the list of targets approved by the BLM. The organizations that are signatories to the MOU have successfully assisted both the BLM and Forest Service in encouraging hunters and shooters to volunteer when organized clean-up efforts at shooting ranges and informal shooting sites are scheduled. We also have expertise to offer in reviewing shooting venues where recommendations for improving shooting safety or enhancing shooting opportunities is sought.

Response



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The alternatives are consistent with federal regulations, which state that target shooting may not facilitate and create a condition of littering, refuse accumulation, and abandoned personal property (43 CFR 8365). Clay targets would still be allowed on BLM-administered lands under the Proposed RMP. Users are responsible for cleaning up the debris from clay targets. Chapter 2, Allowable Use AU10 in the Recreation section of Table 2-2 has been updated to clarify the intent: "Clay targets and similar aerial targets shall be allowed. All targets, clays and shells are considered litter after use and must be removed and properly discarded." A best management practice for promoting the principles of Tread Lightly, which also includes the Respected Access is Open Access campaign was added to Appendix H, page H-63, "REC-32: Promote the principles of Tread Lightly (www.treadlightly.org) outdoor ethics which includes the Respected Access is Open Access campaign through print and electronic media and through personal communications with recreationists participating in recreation activities on BLM- administered lands."

- The comment response on page 6-221 contains an erroneous statement regarding the removal of lead contamination language from the Chapter 4 fish and wildlife section. This statement was not deleted but was intended to be revised on pages 4-146 and 4-190 to the following, "The potential for lead contamination related health effects associated with target shooting in arid environments with alkaline soils is low due to the poor mobility or solubility of lead in these types of environments (EPA 2005). For these reasons target shooting activities are not expected to increase the risk of lead poisoning in humans or animals that utilize these areas."